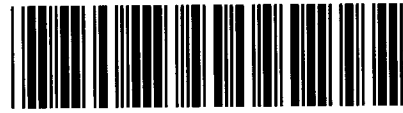


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SOAH DOCKET NO. 473-15-3596
PUC DOCKET NO. 44649

2015 JUL -8 AM 11:33
FILED CLERK

APPLICATION OF CROSS TEXAS	§	BEFORE THE STATE OFFICE
TRANSMISSION, LLC TO AMEND	§	
ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	
FOR THE LIMESTONE TO	§	OF
GIBBONS CREEK 345-KV	§	
TRANSMISSION LINE IN BRAZOS,	§	
FREESTONE, GRIMES, LEON,	§	
LIMESTONE, MADISON AND	§	
ROBERTSON COUNTIES	§	ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE
OF JAMES "TYKE" MARTIN ON BEHALF OF
TSR ENTERPRISES, LLC

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES James "Tyke" Martin on behalf of TSR Enterprises, LLC ("Intervenor"), and files this Motion to Intervene in the above-styled and docketed proceeding pursuant to P.U.C. PROC. R. 22.101, 22.103 and 22.104, and in support thereof respectfully shows the following:

1. On April 25, 2015, Cross Texas Transmission, LLC ("CTT") filed its Application of Cross Texas Transmission, LLC TO amend its Certificate of Convenience and Necessity for the Limestone to Gibbons Creek 345-kV Transmission Line in Brazos, Freestone, Grimes, Leon, Limestone, Madison and Robertson Counties. CTT filed with its application a list of landowners that could be directly affected by one or more of the proposed segments. CTT's list included Intervenor as the owner of property in Madison County, Texas.

2. Intervenor has standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenor has a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain property in Madison County is owned by Intervenor. Intervenor has received notice from CTT that said property may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52(a)(3), by the proposed

transmission line that is the subject of this proceeding. This Motion to Intervene is filed before June 8, 2015 and therefore is timely under SOAH Order No. 1 in this docket.

3. Attorneys Todd W. Boykin and Tyler Topper, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor in the above-styled and docketed proceeding. The name, address, telephone number, and email address for Intervenor's legal counsel are as follows:

BURDETT MORGAN WILLIAMSON & BOYKIN, LLP
Todd W. Boykin – tboykin@bmwb-law.com
Tyler Topper – ttopper@bmwb-law.com
701 South Taylor, LB 103
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

Intervenor requests that the Public Utility Commission of Texas and all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon the authorized representatives at the address shown above.

WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that this Motion to Intervene be granted, that Intervenor be allowed to participate in this proceeding as a party with all rights thereof to the full extent Intervenor desires to do so, and for such further relief to which Intervenor may be entitled.

Respectfully submitted,

BURDETT MORGAN WILLIAMSON & BOYKIN, LLP
701 South Taylor, LB 103
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

By: _____

Todd W. Boykin

State Bar No. 02791600

Tyler Topper

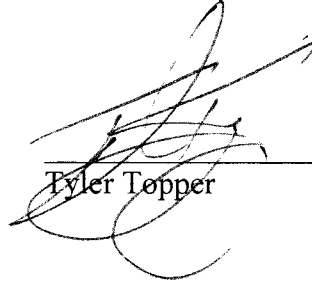
State Bar No. 24059263

ATTORNEYS FOR INTERVENOR

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CERTIFICATE OF SERVICE

4th I certify that a copy of this document was served on all parties in this proceeding on June
2015, in the following manner: by e-mail, facsimile or first class U.S. mail.



Tyler Topper