



Control Number: 45170



Item Number: 61

Addendum StartPage: 0

PUC DOCKET NO. 45170

APPLICATION OF BRAZOS
ELECTRIC POWER COOPERATIVE,
INC. FOR AN AMENDMENT TO A
CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR A 138-KV
TRANSMISSION LINE IN DENTON
COUNTY

§
§
§
§
§
§

2015 NOV 20 PM 3:01
BEFORE THE
PUBLIC UTILITY COMMISSION
FILING CLERK
PUBLIC UTILITY COMMISSION
OF TEXAS

**CTMGT REGATTA II LLC, CADG CROSS OAK RANCH LLC,
CADG LINCOLN PARK SOUTH LLC, AND CADG LINCOLN PARK, LLC'S
REQUEST FOR HEARING ON THE MERITS**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW, CTMGT Regatta II LLC, CADG Cross Oak Ranch LLC, CADG Lincoln Park South LLC, and CADG Lincoln Park, LLC ("Centurion American") parties to the above-referenced proceeding and, pursuant to TEX. GOV'T. CODE §2001.051 and PUC Order No. 3, files this Request for Hearing on the Merits and in support thereof respectfully shows as follows:

I. BACKGROUND

On October 8, 2015, Brazos Electric Power Cooperative, Inc. (Brazos Electric) filed its application in this docket. On November 10, 2015, PUC Order No. 3 was entered, setting November 30, 2015, as the deadline for parties to request a hearing. The Centurion American companies timely filed a Motion to Intervene on November 20, 2015. This request is timely filed.

II. REQUEST FOR HEARING

As of this filing, at least 22 parties filed to Intervene in this proceeding by Motion or Request. The number of stakeholders and the number of alternate routes Brazos Electric proposes necessitate a hearing on the merits and the associated preparation including discovery and submission of written testimony or statements of position in order to fairly adjudicate the matter and determine the best route to comply with PURA § 37.056. The Centurion American companies respectfully request that the Commission refer the above-captioned case to the State Office of Administrative Hearing for hearing on the merits of the Brazos Electric application.

III. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, the Centurion American companies respectfully request that this Request for Hearing on the Merits be granted and for such further relief to which they may be entitled.

Respectfully submitted,

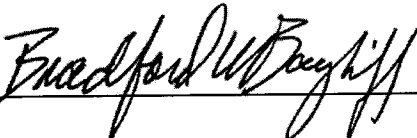
BAYLIFF LAW FIRM PLLC

420 Crosswind Drive

Blanco, Texas 78606

(512) 480-9900

(512) 480-9200 (facsimile)

By: _____

Bradford W. Bayliff

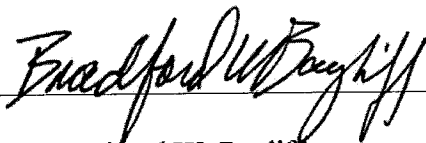
State Bar No. 24012260

bbayliff@reglawfirm.com

**ATTORNEY FOR
CENTURION AMERICAN COMPANIES**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document is being served via email, facsimile, or U.S. mail to all parties of record.


Bradford W. Bayliff