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APPLICATION OF LCRA §
TRANSMISSION SERVICES §
CORPORATION TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE ZORN- §
MARION 345-KV TRANSMISSION §
LINE IN GUADALUPE COUNTY, §
TEXAS §
PUBLIC UTILITY COMMISSION
FILING CLERK
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

ROBERT AND JOAN FRISENHAHN'S MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Robert and Joan Friesenhahn ("Friesenhahn"), pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

I. AUTHORIZED REPRESENTATIVE

Attorneys Patrick L. Reznik and Cassie Gresham pursuant to P.U.C. Proc. R. 22.101(a), hereby notice their appearance as counsel on behalf of Friesenhahn in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor's authorized representative is as follows:

Patrick L. Reznik
BRAUN & GRESHAM, PLLC
P.O. Box 1148
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)
Email: preznik@braungresham.com

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Friesenhahn requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representative.

II. Jurisdiction

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

III. Basis for Intervention

Friesenhahn has a justiciable interest in this proceeding. Friesenhahn owns property that may be directly impacted by one or more of the routes for LCRA Transmission Services Corporation ("LCRA") proposed transmission line. Friesenhahn has been notified by LCRA that their 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 docket. Friesenhahn, therefore, has standing to intervene under P.U.C. PROC. R 22.103(b)(2). The Motion to Intervene is filed within 45 days of the date LCRA filed its Application and therefore is timely under P.U.C. PROC. R 22.104(b). Friesenhahn requests that this Motion to Intervene be granted and that they be recognized as a party.

IV. Acknowledgements

Friesenhahn acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if Friesenhahn files testimony, other parties may cross-examine them at the hearing; (4) if they file any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out

by order in this proceeding; and (5) they are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

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

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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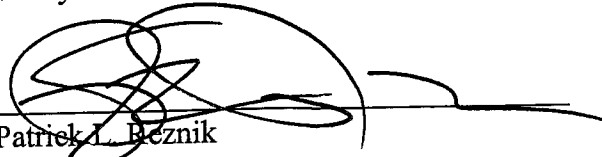
By: 

Patrick L. Reznik
State Bar No. 16806780
Cassie Gresham
State Bar No. 24045980

**ATTORNEYS FOR ROBERT AND JOAN
FRIESENHAHN**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 8, 2016, in accordance with Public Utility Commission Procedural Rule 22.74.


Patrick L. Bcznik