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APPLICATION OF THE CITY OF	8	7910 3C1 20 111 -
GARLAND TO AMEND A	§	BEFORESTEE HILITY COMMISSION FILING CLERK
CERTIFICATE OF CONVENIENCE	§	FILING DECKN
AND NECESSITY FOR THE RUSK TO	§	PUBLIC UTILITY COMMISSION
PANOLA DOUBLE-CIRCUIT 345-KV	§	
TRANSMISSION LINE IN RUSK AND	§	OF TEXAS
PANOLA COUNTIES	8	

CITY OF GARLAND'S OBJECTION TO ESTATE OF ROSELYN BAGWELL'S REQUEST TO INTERVENE

The Estate of Roselyn Bagwell filed its motion to intervene on September 22, 2016. The City of Garland respectfully objects to the motion to intervene. Pursuant to 16 Tex. Admin. Code (TAC) § 22.78(a), this objection is timely filed.

The Estate of Roselyn Bagwell is not on the route the Commission approved in this proceeding, and therefore, will *not be directly affected* by the Commission's Final Order. Further, the intervention deadline has long passed, the hearing has been held, and the Commission has entered its Final Order. However, if the intervention is allowed, Garland respectfully requests that the intervenor take the case as it finds it per 16 TAC § 22.104(d)(3).

For the abovementioned reasons, Garland respectfully requests that the Commission deny the aforementioned motion to intervene and grant such further relief to which Garland may be entitled.



Respectfully submitted,

Brad Neighbor

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ATTORNEYS FOR THE CITY OF GARLAND

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served to all parties of record in this proceeding on September 26, 2016 via the Public Utility Commission of Texas Interchange website and directly served to the Estate of Roselyn Bagwell by mail pursuant to SOAH Order No. 3. Pursuant to SOAH Order No. 5, a true and correct copy of this document was served to Intervenors Ms. Elizabeth Lane and Ms. Gloria Moffett by mail.