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SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624

2016 MAR 21 PM 4:44

APPLICATION OF THE CITY OF §  
GARLAND TO AMEND A §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE RUSK TO §  
PANOLA DOUBLE-CIRCUIT 345-KV §  
TRANSMISSION LINE IN RUSK AND §  
PANOLA COUNTIES §

PUBLIC UTILITY COMMISSION  
FILING CLERK  
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

PANOLA-HARRISON ELECTRIC COOPERATIVE, INC.'S  
MOTION TO INTERVENE

NOW COMES Panola-Harrison Electric Cooperative, Inc. ("Panola") and files this Motion to Intervene in the above-referenced docket and in support thereof respectfully show the following:

1. Panola is a distribution electric cooperative headquartered in Marshall, Texas and serves two counties, Harrison and Panola in Texas; and Panola also serves two parishes in Louisiana, Caddo and DeSoto.

2. On February 25, 2016, the City of Garland ("Garland") filed an Application to Amend a Certificate of Convenience and Necessary for the Rusk to Panola Double-Circuit 345 kV Transmission Line in Rusk and Panola Counties.

3. Panola received notice of City of Garland's filing as a neighboring utility under PUC PROC. R. 22.52(a)(2).

4. Panola has a right to participate in this proceeding as a neighboring utility under the Commission's rules and has a justiciable interest which may be adversely affected by the outcome of this proceeding.

5. In accordance with the foregoing Panola has standing to intervene as an "affected person" under the Public Utility Regulatory Act ("PURA"), TEX. UTIL. Code Ann. §§11.001 et seq. and PUC PROC. R. 22.103(b)(2).

6. The name, address and telephone number of Panola's representative is as follows:

Kathy Wood, General Manager  
Panola-Harrison Electric Cooperative, Inc.  
P.O. Box 1058  
Marshall, Texas 75671  
(903) 935-1416

7. The name, address and telephone number of Panola's legal representative is:

Mark C. Davis  
Russell G. Parish  
Holland & Knight, LLP  
1005 Congress Avenue  
Suite 950  
Austin, Texas 78701  
(512) 472-1081  
(512) 472-7473 Facsimile

Panola request that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents upon said legal representatives.

**WHEREFORE, PREMISES CONSIDERED,** Panola respectfully move to intervene in this docket, as parties with all rights thereof. Panola also request all relief to which they may show themselves entitled.

Respectfully submitted,

  
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**ATTORNEYS FOR PANOLA-HARRISON  
ELECTRIC COOPERATIVE, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of March, 2016, a true and correct copy of the above and foregoing was served on all parties of record by First Class, U.S. Mail, postage prepaid.

*Mark C. Davis*

Mark C. Davis *by permission self*