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

2016 MAR 23 AM 11:00

PUBLIC UTILITY COMMISSION
FILING CLERK

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

RUSK COUNTY ELECTRIC COOPERATIVE, INC.'S
MOTION TO INTERVENE

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

1. Rusk County is a distribution electric cooperative headquartered in Henderson, Texas and serves five counties: Rusk, Gregg, Panola, Shelby and Nacogdoches.
2. On February 25, 2016, the City of Garland ("Garland") filed an Application to Amend a Certificate of Convenience and Necessity for the Rusk to Panola Double-Circuit 345 kV Transmission Line in Rusk and Panola Counties.
3. Rusk County received notice of City of Garland's filing as a neighboring utility under PUC PROC. R. 22.52(a)(2).
4. Rusk County 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.

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5. In accordance with the foregoing Rusk County 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:

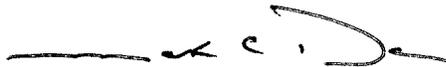
Richard A. McLeon, General Manager
Rusk County Electric Cooperative, Inc.
P.O. Box 1169
Henderson, Texas 75653
(903) 657-4571

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

WHEREFORE, PREMISES CONSIDERED, Rusk County requests that this Motion to Intervene be granted.

Respectfully submitted,



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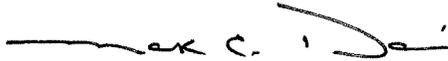
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**ATTORNEYS FOR RUSK COUNTY ELECTRIC
COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd 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