



Control Number: 45866



Item Number: 930

Addendum StartPage: 0

APPLICATION OF LCRA § BEFORE THE STATE OFFICE 2:49
 TRANSMISSION SERVICES §
 CORPORATION TO AMEND A § PUBLIC UTILITY COMMISSION
 CERTIFICATE OF CONVENIENCE § FILING CLERK
 AND NECESSITY FOR THE ROUND § OF
 ROCK – LEANDER 138kV §
 TRANSMISSION LINE IN §
 WILLIAMSON COUNTY, TEXAS § ADMINISTRATIVE HEARINGS

CEDAR PARK LAND, LP'S MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

Pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101-.104 and Substantive Rule 25.101, Cedar Park Land, LP ("CPL") files this Motion to Intervene in the above referenced proceeding, and in support thereof, would respectfully show as follows:

**I.
BASIS FOR INTERVENTION**

On April 28, 2016, LCRA Transmission Services Corporation ("LCRA") filed its Application in this proceeding to amend its certificate of convenience and necessity for the proposed Round Rock to Leander 138kV transmission line project in Williamson County, Texas.

CPL owns property that is within the zone of public interest of the proposed line and is affected by the proposed line. CPL's property in Williamson County is located within the study area and is traversed by and/or affected by proposed segments of the proposed line. The maps filed by LCRA in its Application indicate that an alternative route crosses and/or affect CPL's property, particularly segments K3, P2, and L3. Thus, CPL is directly affected by the proposed line, has a justiciable interest in the controversy, and has standing to intervene. P.U.C. PROC. R. § 22.103(b).

CPL's intervention is timely because it is filed before June 13, 2016, the intervention deadline set in SOAH Order No. 1 Requiring Information from Applicant and Recommendation

from Staff on Sufficiency of Application and Notice; Addressing Other Procedural Matters (April 29, 2016).

II.
AUTHORIZED REPRESENTATIVE/APPEARANCE OF COUNSEL

Pursuant to PUC Procedural Rule § 22.101, Roy Brandys, Nicholas P. Laurent, and Blaire A. Knox hereby notice their appearance as counsel on behalf of CPL in this proceeding. CPL's authorized representative in this matter are:

Roy Brandys
Nicholas P. Laurent
Blaire A. Knox
BARRON & ADLER, LLP
808 Nueces Street
Austin, Texas 78701
(512) 478-4995
(512) 478-6022 (fax)
brandys@barronadler.com
laurent@barronadler.com
knox@barronadler.com

CPL requests that all notices, pleadings, orders, correspondence, documents, discovery, requests for information, responses to requests for information, proposals for decisions, and other filings and papers be served on its authorized representative named herein.

III.
INTERVENOR'S ACKNOWLEDGMENTS

As an intervenor in this proceedings, CPL acknowledges that: (1) it is a party to the case, (2) it is requires to respond to all discovery requests from other parties in the case, (3) if it files testimony, it may be cross-examined in the hearing, (4) if it files any documents in the case, it will have to provide a copy of that documents to every other part in the case, and (5) it is bound by the Procedural Rules of the PUC and SOAH.

**IV.
PRAYER**

WHEREFORE, PREMISES CONSIDERED, Cedar Park Land, LP respectfully requests that it be permitted to intervene in this matter, that it be granted full party status in this proceeding, and for such other further relief to which it may show itself entitled.

Respectfully submitted,

BARRON & ADLER, LLP
808 Nueces Street
Austin, Texas 78701
(512) 478-4995
(512) 478-6022 (fax)

By: /s/ Blaire A. Knox

Roy Brandys (SBN 02883550)
brandys@barronadler.com
Nicholas P. Laurent (SBN 24065591)
laurent@barronadler.com
Blaire A. Knox (SBN 24074542)
knox@barronadler.com

ATTORNEYS FOR CEDAR PARK LAND, LP

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 13, 2016, in accordance with Public Utility Commission Procedural Rule § 22.74.

/s/ Blaire A. Knox

Blaire A. Knox