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APPLICATION OF LCRA TRANSMISSION §
SERVICES CORPORATION TO AMEND A §
CERTIFICATE OF CONVENIENCE AND §
NECESSITY FOR THE COOKS POINT §
138-KV TRANSMISSION LINE IN §
BURLESON COUNTY §

PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
OF FILING CLERK

TEXAS

MOTION TO INTERVENE OF DONALD C. KRAUSE, LEROY C. KAZMIR,

ELAINE H. MITCHELL AND MARSHALL A. HARRELL, JR.

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES Donald C. Krause, Leroy C. Kazmir, Elaine H. Mitchell and Marshall A. Harrell, Jr. ("Intervenors") pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104, and files this Motion to Intervene in the above-captioned docket. In support thereof respectfully shows the following:

1. On May 31, 2018, LCRA Transmission Services Corporation ("LCRA") filed its Application to Amend a Certificate of Convenience and Necessity for the Cooks Point 138-KV Transmission Line in Burleson County. LCRA filed with its application a list of landowners that could be directly affected by one or more of the proposed segments. LCRA's list included Intervenors as the owners of properties in Burleson County, Texas.

2. Intervenors have standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenors have a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain properties in Burleson County are owned by Intervenors. Intervenors have received notice from LCRA that Intervenors' said properties 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 proceeding. This Motion to Intervene is filed before July 16, 2018 and therefore is timely filed.

3. Attorneys Tyler Topper and Todd W. Boykin, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenors. Intervenors desire to be a party to the above-styled and docketed proceeding and have input in the routing process.

4. For these reasons, good cause exists to grant Intervenor's request to intervene pursuant to P.U.C. Proc. R. 22.104.

5. Intervenor's request that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon its counsel as follows:

BURDETT MORGAN WILLIAMSON & BOYKIN, LLP

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

Respectfully Submitted,

BURDETT, MORGAN, WILLIAMSON & BOYKIN, L.L.P.

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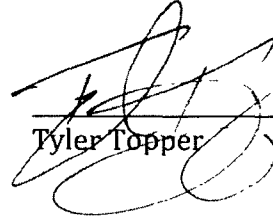
State Bar No. 02791600

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ATTORNEYS FOR INTERVENORS

CERTIFICATE OF SERVICE

I certify that on the 1st day of July, 2018 a true and correct copy of the foregoing document was served in compliance with PROC. R. 22.74 and Order No. 1.


Tyler Topper