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PUC DOCKET NO. 52455

APPLICATION OF ONCOR ELECTRIC	§	
DELIVERY COMPANY LLC TO AMEND	§	
ITS CERTIFICATE OF CONVENIENCE	§	PUBLIC UTILITY COMMISSION
AND NECESSITY FOR THE OLD	§	
COUNTRY SWITCH 345-KV TAP	§	OF TEXAS
TRANSMISSION LINE IN ELLIS	§	
COUNTY	§	

CHAMBERS CREEK RANCH’S MOTION TO INTERVENE

Chambers Creek Ranch, LLC (“Chambers Creek Ranch”), pursuant to Public Utility Commission ("PUC") 16 Texas Administrative Code (TAC) §§ 22.101, 22.102, 22.103 and 22.104, hereby files its Motion to Intervene in the above-styled and numbered proceeding and in support thereof shows as follows:

1. Chambers Creek Ranch owns property located within the service territory of Oncor Electric Delivery Company LLC (“Oncor”).
2. Oncor has notified Chambers Creek Ranch that its property may be directly affected by Oncor’s proposed transmission line that is the subject of this docket. Thus, Chambers Creek Ranch has standing to intervene under 16 TAC § 22.103(b)(2) and has a justiciable interest in this proceeding because one or more of Oncor’s proposed routes if selected as the final route for Oncor’s proposed transmission line, directly affect Chambers Creek Ranch’s property.
3. Chambers Creek Ranch’s designated corporate representative in this matter is:

Barron D. Kidd, Manager
Chambers Creek Ranch, LLC
3838 Oak Lawn Ave., Suite 910
Dallas, Texas 75219

4. Chambers Creek Ranch's authorized counsel in this proceeding is:

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5. Chambers Creek Ranch hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs, or other documents upon Chambers Creek Ranch's counsel.
6. Chambers Creek Ranch acknowledges: (1) it will be a party to the case; (2) it will be required to respond to all discovery requests from other parties in the case; (3) if it files testimony, other parties may cross-examine them at the hearing; (4) if it files any documents in this case, copies of those documents will be served to all other parties in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) it is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.
7. Therefore, Chambers Creek Ranch respectfully urges the Administrative Law Judge to grant Chambers Creek Ranch's motion to intervene in this proceeding and to grant it any other relief to which it may be entitled.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

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By: /s/Alfred R. Herrera

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**ATTORNEYS FOR CHAMBERS CREEK
RANCH, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this the 21st day of September, 2021, a true and correct copy of *Chambers Creek Ranch's Motion to Intervene* was served upon all parties of record by facsimile, electronic mail, and/or First-class mail United States mail, postage paid.

By: /s/Leslie Lindsey
Leslie Lindsey