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**JOINT APPLICATION OF AEP TEXAS §
INC. AND SHARYLAND UTILITIES §
L.L.C. TO AMEND THEIR §
CERTIFICATES OF CONVENIENCE §
AND NECESSITY FOR THE LA §
PALMA TO KINGFISHER DOUBLE- §
CIRCUIT 345-KV TRANSMISSION §
LINE IN CAMERON COUNTY §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**PALO VERDE/LAS RETAMOS NEIGHBORS ASSOCIATION'S
MOTION TO INTERVENE**

COMES NOW, the Palo Verde/Las Retamos Neighbors Association (Palo Verde Neighbors) and files this Motion to Intervene as a party to this proceeding. In support of its Motion, Palo Verde Neighbors shows the following:

1. Palo Verde Neighbors is a group of landowners with property surrounding the Resaca – an area directly impacted by several of the routes proposed by AEP Texas Inc. (AEP Texas) and Sharyland Utilities L.L.C. (Sharyland) for the La Palma to Kingfisher transmission line.

2. On June 29, 2022, AEP Texas and Sharyland filed a joint application to amend their certificates of convenience and necessity for the La Palma to Kingfisher transmission line. Palo Verde Neighbors may be adversely impacted by the requested amendment. Therefore, Palo Verde Neighbors has a justiciable interest in this proceeding.

3. Palo Verde Neighbors' authorized representatives in this matter are:

Thomas L. Brocato
Roslyn M. Dubberstein
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800 Tel.
(512) 472-0532 Fax
tbrocato@lglawfirm.com
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WHEREFORE, PREMISES CONSIDERED, Palo Verde Neighbors requests that this Motion to Intervene be granted.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

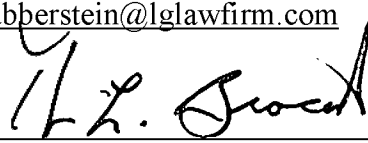
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THOMAS L. BROCATO

State Bar No. 03039030

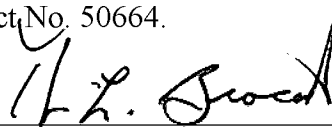
ROSLYN M. DUBBERSTEIN

State Bar No. 24117520

**ATTORNEYS FOR THE PALO VERDE/LAS
RETAMOS NEIGHBORS ASSOCIATION**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on June 30, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



THOMAS L. BROCATO