



## **Filing Receipt**

**Filing Date - 2023-06-09 09:01:32 AM**

**Control Number - 55067**

**Item Number - 10**

**PUC DOCKET NO. 55067**

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| <b>APPLICATION OF ONCOR ELECTRIC</b>   | <b>§</b> | <b>PUBLIC UTILITY COMMISSION</b> |
| <b>DELIVERY COMPANY LLC TO AMEND</b>   | <b>§</b> |                                  |
| <b>ITS CERTIFICATE OF CONVENIENCE</b>  | <b>§</b> | <b>OF</b>                        |
| <b>AND NECESSITY FOR THE RAMHORN</b>   | <b>§</b> |                                  |
| <b>HILL – DUNHAM 345 KV</b>            | <b>§</b> |                                  |
| <b>TRANSMISSION LINE IN DENTON AND</b> | <b>§</b> |                                  |
| <b>WISE COUNTIES</b>                   | <b>§</b> | <b>TEXAS</b>                     |

**MOTION TO INTERVENE OF EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD,  
CO-TRUSTEES OF THE WATKINS FAMILY TRUST**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COME Edgar Brent Watkins and Mary Ann Livengood, Co-Trustees of the Watkins Family Trust (“Intervenors”), pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104, and file this Motion to Intervene in the above-captioned docket. In support thereof, Intervenors respectfully show the following:

1. On June 8, 2023, Oncor Electric Delivery Company, LLC (“Oncor”) filed its Application to for a Certificate of Convenience and Necessity for the Ramhorn Hill to Dunham 345-KV Transmission Line in Denton and Wise Counties. Oncor filed with its application a list of landowners that could be directly affected by one or more of the proposed segments. Oncor’s list included Intervenors as the owners of property in Wise County, Texas.

2. Intervenors have a 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 property in Wise County is owned by Intervenors. Intervenors have received notice from Oncor that Intervenors’ said property 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 24, 2023, and therefore is timely filed.

3. Attorneys Tyler Topper and Christian Stewart, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenors. Intervenors desire to be parties 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.

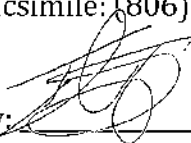
5. Intervenor request that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon their counsel as follows:

Tyler Topper  
Texas Bar No. 24059263  
[ttopper@mw-law.com](mailto:ttopper@mw-law.com)  
Christian Stewart  
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**MORGAN WILLIAMSON LLP**  
701 South Taylor, Suite 440  
Amarillo, Texas 79101  
Telephone: (806) 358-8116  
Facsimile: (806) 350-7642

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 parties with all rights thereof to the full extent Intervenor desire to do so, and for such further relief to which Intervenor may be entitled.

Respectfully Submitted,

MORGAN WILLIAMSON LLP  
701 South Taylor, Suite 440  
Amarillo, Texas 79101  
Telephone: (806) 358-8116  
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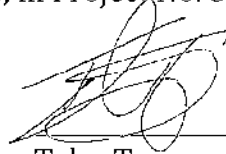
By: 

Tyler Topper  
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**ATTORNEYS FOR INTERVENORS**

**CERTIFICATE OF SERVICE**

I certify a copy of this document is being filed in the Public Utility Commission's Interchange System and served on all parties of record as required by orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020, in Project No. 50664.

A handwritten signature in black ink, appearing to read 'Tyler Topper', is written over a horizontal line.

Tyler Topper