



Filing Receipt

Filing Date - 2023-07-24 03:32:12 PM

Control Number - 55067

Item Number - 1175

PUC DOCKET NO. 55067

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

MOTION TO INTERVENE OF AVALON 71, LLC

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COMES AVALON 71, LLC, a Texas limited liability company (“Intervenor”), 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, Intervenor respectfully shows the following:

I. BASIS FOR INTERVENTION

Intervenor has a justiciable interest in this proceeding as Intervenor owns property that may be directly impacted by one or more of the routes for Oncor Electric Delivery LLC’s (“Oncor”) proposed Ramhorn Hill – Dunham 345-Kv transmission line project. Intervenor has received notice from Oncor that Intervenor’s 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. Intervenor, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). This Motion to Intervene is filed before July 24, 2023, and therefore is timely filed.

II. ACKNOWLEDGEMENTS

Intervenor acknowledges: (1) Intervenor will be a party to the case; (2) Intervenor will be required to respond to all discovery requests from other parties in the case; (3) if Intervenor files testimony, other parties may cross-examine him at the hearing; (4) if Intervenor files any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) Intervenor is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

III. NOTICE OF APPEARANCE

Attorneys Travis L. Boghetich and Caitlin P. Simmons, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor. Intervenor desires to be parties to the above-styled and docketed proceeding and have input in the routing process.

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

Travis L. Boghetich
Texas State Bar No. 24055189
travis@txrcallaw.com
Caitlin P. Simmons
Texas State Bar No. 24097182
caitlin@txrcallaw.com
BOGHETICH LAW, PLLC
1800 Valley View Lane, Suite 360
Farmers Branch, Texas 75234
Office: (469)-556-7914
Fax: (469) 892-7202

IV. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests 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,

/s/ Travis L. Boghetich
Travis L. Boghetich
State Bar No. 24055189
travis@txrcallaw.com
Caitlin P. Simmons
State Bar No. 24055189
caitlin@txrcallaw.com
BOGHETICH LAW, PLLC
1800 Valley View Lane, Suite 360
Farmers Branch, Texas 75234
Tel: 469-556-7914
Fax: 469-892-7202

ATTORNEYS FOR INTERVENOR