



## **Filing Receipt**

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**PUC DOCKET NO. 55067  
SOAH DOCKET NO. 473-23-21216**

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

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**MOTION TO INTERVENE OF DUDLEY REALTY, LLC**

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NOW COMES Dudley Realty, LLC (“Dudley Realty” or “Intervenor”) and files this Motion to Intervene in the above-referenced proceeding. In support of its motion, Dudley Realty would respectfully show the following:

**I. BACKGROUND**

On June 8, 2023, Oncor Electric Delivery Company LLC (“Oncor”) filed its application to amend its certificate of convenience and necessity for the Ramhorn Hill to Dunham 345 kV transmission line (the “Transmission Line”) in Denton and Wise Counties (the “Application”). Pursuant to the notice provided by the Public Utility Commission (“PUC”) to Dudley Realty in connection with the Application, the deadline for intervention is July 24, 2023.

**II. AUTHORIZED REPRESENTATIVES**

Dudley Realty’s authorized representatives are:

M. Scott Barnard  
Matthew V. Lloyd  
Akin Gump Strauss Hauer & Feld LLP  
2300 N. Field Street  
Suite 1800  
Dallas, Texas 75201  
(214) 969-2800  
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Dudley Realty requests that copies of pleadings and all other documents be served on Dudley Realty's authorized representatives.

### **III. BASIS FOR INTERVENTION**

Dudley Realty is the owner of property identified by Oncor in its Application as directly affected by Segments 17, 18, and J3 of the Transmission Line. *See* Application, Attachment No. 8 at 38. Additionally, the Application lists the following routes as directly affecting the property held by Dudley Realty: 29, 33, 36, 41, 42, 54, 71, 86, 116, 130, 132, 137, 138, 154, 175, 176, 178, 179, 184, 185, 186, 187, 207, 216, 217, 218, 221. *See id.* Accordingly, Dudley Realty has a direct, substantial, and justiciable interest that may be adversely affected by the outcome of this proceeding. *See* P.U.C. Proc. R. 22.52(a)(3), 22.101(a), 22.103(b)(2), 22.104.

### **IV. CONCLUSION AND PRAYER**

For the foregoing reasons, Dudley Realty respectfully requests that the PUC and/or the State Office of Administrative Hearings grant this Motion to Intervene, and that Dudley Realty be allowed to participate as a party to this proceeding and be granted such further relief to which Dudley Realty may be entitled both at law and in equity.

DATED: July 24, 2023

Respectfully Submitted,

/s/ M. Scott Barnard

M. Scott Barnard

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of July, 2023, a true and correct copy of the foregoing document was electronically filed with the Commission via the PUC Interchange, which system has provided email notice to all parties of record.

/s/ M. Scott Barnard

M. Scott Barnard