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

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

* **PUBLIC UTILITY COMMISSION**
*
* **OF**
*
*
* **TEXAS**

**MOTION TO INTERVENE OF BETTYE WILEY NEELY, ABUREY EUGENE WILEY, DAVID RANDOLPH WILEY,
DONALD BRYAN NEELY, DANA LAURINE TUR, HOWARD RAY SCHWOPE AND JANICE VARDAKIS**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COMES Bettye Wiley Neely, Aubrey Eugene Wiley, David Randolph Wiley, Donald Bryan Neely, Dana Lauraine Tur, Howard Ray Schwope and Janice Vardakis, Co-owners, ("Intervenors"), pursuant to P.U.C. Proc. R.22.101,22.102, 22.103 and 22.104, and file this Motion to Intervene in the above-captioned docket. In support thereof, I Intervenors respectfully show the following:

I. JURISDICTION

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA Sec 37.053.

II. BASIS FOR INTERVENTION

On June 8, 2023, Oncor Electric Delivery Company, LLC ("Oncor") filed its Application for Certificate of Convenience and Necessity for the Ramhorn Hill to Dunham 345-KV Transmission Line in Denton and Wise Counties, Texas. 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 is proceeding. As stated above, certain property in Denton County, Texas is owned by Intervenors. Intervenors have received notice from Oncor that Intervenors' said property may be directly affected, by one or more of the utility's proposed routes for a transmission

line, as that term is defined in P.U.C. Proc. R. 22.52 (a)(3), that is the subject of this proceeding. The line as proposed would unduly subdivide and partition the property in a way that would damage the remainder and make the property difficult to develop. For these reasons, good cause exists to grant Intervenor's request to intervene Pursuant to P.U.C. P to c. R 22.104. A map showing the general location of Intervenor's property is attached hereto as Exhibit A and incorporated herein by reference for all purposes.

III TIMELINESS OF INTERVENTION

This Motion to Intervene is filed before July 24, 2023, and therefore is timely filed.

IV AUTHORIZED REPRESENTATION

Attorney, William D. Tate, pursuant to P.U.C. Proc. 22.101(a), hereby gives notice of his 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.

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

WILLIAM D. TATE
Attorney for Intervenor
Texas Bar No. 19666000
601 W. Wall Street
Grapevine, Texas 76051
Telephone: 817-481-2591
Fax: 817-481-0867
Email: wdtate@verizon.net

V. ACKNOWLEDGEMENTS

Intervenor acknowledges: (1) they will be a party to the case, (2) they will be required to respond to all discovery requests from other parties in the case, (3) if they file testimony, other parties may cross-examine them at the hearing, (4) if they file 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) they are bound by the Procedural Rules of the

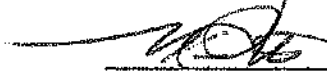
procedures set out by order in this proceeding, and (5) they are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

VI. PRAYER

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.

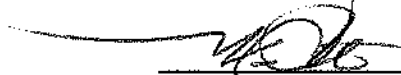
Respectfully Submitted,



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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 of June 11, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.



William D. Tate

