

Filing Receipt

Filing Date - 2023-06-16 10:55:38 AM

Control Number - 55067

Item Number - 16

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

ş

APPLICATION OF ONCOR ELECTRIC DELIVERY, LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL-DUNHAM 345-KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

WAYNE AND NORMA WILKERSON'S MOTION TO INTERVENE

COMES NOW Woods of Greenshores Property Owners Association, Inc. (WOGPOA) and files this Motion to Intervene and would respectfully show as follows:

I. INTRODUCTION

On June 8, 2023, Oncor Electric Delivery, LLC, ("Oncor") filed an application to amend its CCN to add the Ramhorn Hill to Dunham 345-kV transmission line in Denton and Wise Counties. Wayne and Norma Wilkerson (the "Wilkersons") own property along one of the proposed route segments and seek to intervene and fully participate in this proceeding pursuant to 16 Texas Administrative Code (TAC) §§ 22.103–04. As set forth below, the Wilkersons have a justiciable interest that may be adversely affected by the outcome of this proceeding.

II. AUTHORIZED REPRESENTATIVES

The Wilkersons' authorized representatives for service of all pleadings and other documents in this docket and legal representative are:

Joe Freeland **Mathews & Freeland, LLP** 8140 N. Mopac Expy, Suite 4-240 Austin, Texas 78759 Telephone: (512) 404-7800 Facsimile: (512) 703-2785 Email: <u>jfreeland@mandf.com</u> (Email for Service)

All pleadings, motions and other documents in this proceeding should be served on the Wilkersons' authorized representatives.

III. TIMELINESS OF INTERVENTION

The intervention deadline for system improvement charge applications is July 24, 2023.¹ This motion, therefore, is timely filed.

IV. JUSTICIABLE INTEREST

The Wilkersons own Tract 2192, as identified on Attachment 8 (Listing of Directly Affected Landowners for Notice) contained in Oncor's application. Their property would be directly affected if the proposed line is routed across Segment M8,. The Wilkersons, therefore, have a clear justiciable interest that may be adversely affected by the outcome of this proceeding.

V. PRAYER

WHEREFORE, PREMISES CONSIDERED, the Wilkersons respectfully request that this motion to intervene be granted, that they be granted party status, and that they receive any and all relief to which it shows that it is justly entitled.

Filed: June 16, 2023

Respectfully submitted.

C. Jee Freeland State Bar No. 07417500 Mathews & Freeland, LLP 8140 N. MoPac Expy, Ste 4-200 Austin, Texas 78759 Telephone (512) 404-7800 Facsimile (512) 703-2785 jfreeland@mandf.com

ATTORNEYS FOR WAYNE AND NORMA WILKERSON

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 16, 2023, in accordance with the Orders Suspending Rules filed in Project No 50664

Freeland Joe

¹ Order of Referral and Preliminary Order (June 9, 2023).