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

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

MOTION TO INTERVENE OF ROSS BREWER

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES ROSS BREWER (“Intervenor”), and pursuant to P.U.C. Proc. R. . 22.101, 22.103, and 22.104, files this Motion to Intervene in the above-captioned docket. In support thereof, Intervenor respectfully shows the following:

1. On June 8, 2023, Oncor Electric Delivery Company, LLC (“Oncor”) filed its Application to Amend Its Certificate of Convenience and Necessity for the Proposed Ramhorn Hill Switch- 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 Intervenor as the owner of property affected in Wise County, Texas, along Link P4.

2. Intervenor has standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenor has 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 Intervenor. Intervenor has received notice from Oncor that Intervenor’s 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 under SOAH Order No. 2 in this docket.

3. Attorneys Todd W. Boykin, Lindsey Rusler and C. Jason Fenton, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor. Intervenor desires to be a party to the above-styled and docketed proceeding and has input in the routing process.

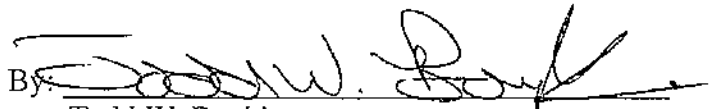
4. Intervenor requests that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon its counsel as follows:

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WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that this Motion to Intervene be granted and that Intervenor be 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,

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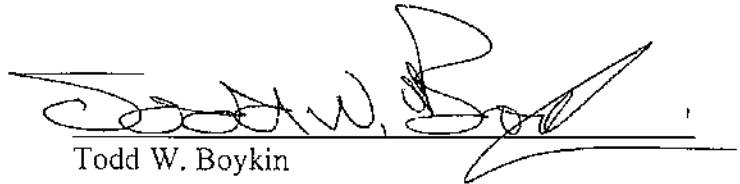
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ATTORNEYS FOR INTERVENOR

CERTIFICATE OF SERVICE

I certify that 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 Second Order Suspending Rules issued on July 14, 2020 in Docket No. 50664.


Todd W. Boykin