



## **Filing Receipt**

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**SOAH DOCKET NO. 473-23-21216  
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<b>APPLICATION OF ONCOR ELECTRIC</b>	<b>§</b>	<b>BEFORE THE</b>
<b>DELIVERY LLC TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>RAMHORN HILL – DUNHAM 345 KV</b>	<b>§</b>	<b>OF TEXAS</b>
<b>TRANSMISSION LINE IN DENTON</b>	<b>§</b>	
<b>AND WISE COUNTIES</b>	<b>§</b>	

**TOWN OF NORTHLAKE’S MOTION TO INTERVENE**

COMES NOW the Town of Northlake (“Northlake”) and pursuant to the procedural rules of the Public Utility Commission of Texas (the “Commission”), 16 Tex. Admin. Code §§ 22.101 – 22.104, files this Motion to Intervene as a party in the above-referenced proceeding. In support hereof, Northlake respectfully shows as follows:

1. On June 8, 2023, Oncor Electric Delivery LLC (“Oncor”) filed an application to amend its certificate of convenience and necessity (“CCN”) for the Ramhorn Hill – Dunham 345 kV transmission line in Denton and Wise Counties.
2. Northlake is a home rule municipality in Denton County whose incorporated limits and extra-territorial jurisdiction (“ETJ”) would be crossed by several of the proposed segments of the Ramhorn Hill – Dunham 345 kV transmission line.
3. Northlake was included as one of the municipalities to whom Oncor sent notice of its application and a request for comments on the proposed transmission line, and Northlake has been actively involved in the pre-application public meetings and participation process conducted by Oncor.
4. Northlake acknowledges that transmission line capacity is needed for the area to be served by the proposed Oncor transmission line.
5. Northlake has expended substantial resources in municipal planning and improvements for areas directly affected by several of the proposed transmission line segments and a substantial number of Northlake’s tax-paying residents own and occupy property located on and near various proposed transmission line segments.

6. Without waiving any arguments that it may make in its testimony and evidence in this proceeding, Northlake prefers the shortest and most economical route that avoids as much as possible dense residential, high-ecological value natural areas, and high-value developments. In particular, an area to be avoided is the greenbelt area through Canyon Falls.
7. These interests and concerns of Northlake constitute a more-than-sufficient justiciable interest in the outcome of this proceeding and accordingly confers standing on Northlake to intervene under Commission Rule § 22.103(b).
8. This motion to intervene is timely filed prior to the July 24, 2023 intervention deadline established by the Commission.
9. Northlake acknowledges that it is prepared to carry out all responsibilities of a party as set forth in Commission rules.
10. Northlake's authorized representative in this docket is the undersigned attorney whose contact information is set out below. All pleadings, correspondence, notices, requests for information and other materials filed in this docket may be served on Northlake through the undersigned authorized representative.

WHEREFORE, PREMISES CONSIDERED, the Town of Northlake respectfully requests that this Motion to Intervene be granted and that it be allowed to participate in this proceeding as a party.

Respectfully submitted,

/s/ **Stephen C. Dickman**

Stephen C. Dickman

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**ATTORNEY FOR TOWN OF NORTHLAKE**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies 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 21, 2023 in accordance with the Order Suspending Rules issued in Project No. 50664.

*/s/ Stephen C. Dickman*

Stephen C. Dickman