



## **Filing Receipt**

**Filing Date - 2023-07-19 11:40:08 AM**

**Control Number - 55067**

**Item Number - 269**

**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  
\*  
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\*  
\* TEXAS**

**MOTION TO INTERVENE OF J. YOUNG LAND AND CATTLE CO. LTD**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COMES J. YOUNG LAND AND CATTLE CO. LTD, a Texas limited partnership whose general partner is RJJ Young, Inc., owner, (“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, several, separate tracts of real property in Denton County, Texas are 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. Your notice describes Tracts #III4 and III7. The G 3 route, as proposed would unduly subdivide and partition the property in a way that would damage the remainder. The line should follow the new proposed FM II7I and other roadways and property lines where ever possible and not just take the shortest route across properties. 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. The tax reference numbers marked in yellow are owned 100% and the reference numbers marked in pink are owned 50%.

### **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's. Intervenor's desire to be parties to the above-styled and docketed proceeding and have input in the routing process.

Intervenor's request 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's  
Texas Bar No. 19666000  
601 W. Wall Street  
Grapevine, Texas 76051  
Telephone: 817-481-2591  
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### **V. ACKNOWLEDGEMENTS**

Intervenor's 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 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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William D. Tate  
**Attorney for Intervenor**  
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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 July 19, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

  

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William D. Tate

# Denton CAD Webmap

