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

MOTION TO INTERVENE OF GRBK EDGEWOOD LLC

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

GRBK Edgewood LLC ("GRBK") files this Motion to Intervene pursuant to 16 Texas Administrative Code ("TAC") §§ 22.101, 22.103(b), and 22.104, and in support thereof would respectfully shows:

I. BACKGROUND

On June 8, 2023, Oncor Electric Delivery LLC ("Oncor") filed its application to amend its certificate of convenience and necessity for the Ramhorn Hill to Dunham 345 kV transmission line (the "Transmission Line") in Denton and Wise Counties (the "Application"). Pursuant to 16 TAC § 22.104, motions to intervene must be filed within 45 days from the date an application is filed with the Public Utility Commission of Texas (the "Commission"), unless otherwise provided by statute, Commission rule, or order of the presiding officer. Oncor filed its application on June 8, 2023, making the deadline to file a motion to intervene July 24, 2023. Therefore, this motion is timely filed.

II. AUTHORIZED REPRESENTATIVE

The name, address, telephone number, and email address of GRBK's authorized representatives are as follows:

Bobby Samuel
Vice President
GRBK Edgewood LLC
2805 Dallas Parkway Ste 400
Plano Texas, 75093
469-573-6721
bsamuel@greenbrickpartners.com

with a copy to:

Brad Williams
Director of Land Acquisition and Entitlements
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All pleadings and other documents should be served upon GRBK's authorized representatives.

III. MOTION TO INTERVENE

GRBK is the owner and developer of property identified by Oncor in its Application as directly affected by proposed segment "M3" of the Transmission Line.¹ Consequently, GRBK has a direct, substantial, and justiciable interest that may be adversely affected by the outcome of this proceeding. In recognition of that justiciable interest, and pursuant to 16 TAC §§ 22.52(a)(3), 22.101, 22.103(b), and 22.104, GRBK moves to intervene as a party in this docket so that it may ensure its interests are protected.

IV. CONCLUSION AND PRAYER

Therefore, GRBK respectfully requests that the Administrative Law Judge grant this Motion to Intervene so that GRBK may participate in this docket as a party with all rights thereof, and for such other relief to which it may be justly entitled.

¹ *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*, Docket No. 55067, Attachment 8, Listing of Directly Affected Land Owners for Notice at 103 (Jun. 8, 2023).

Respectfully submitted,

/s/ Hilary Liston

Hilary Liston, Esq.

SB# 00791786

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CERTIFICATE OF SERVICE

I certify that on June 23, 2023, a true and correct copy of the foregoing instrument was served on all parties of record by electronic mail.

/s/ Hilary Liston

Hilary Liston, Esq.