



## **Filing Receipt**

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<b>APPLICATION OF ONCOR ELECTRIC</b>	<b>§</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>	

**MOTION TO INTERVENE OF GBTM SENDERA, LLC**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

GBTM Sendera, LLC ("GBTM") 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 GBTM's authorized representatives are as follows:

Bobby Samuel  
Development Manager, Authorized Signer  
GBTM Sendera, LLC  
2805 Dallas Parkway Suite 400  
Plano Texas, 75093  
469-573-6721  
[bsamuel@greenbrickpartners.com](mailto:bsamuel@greenbrickpartners.com)

with a copy to:

Brad Williams  
Director of Land Acquisition and Entitlements  
Green Brick Partners, Inc.  
2805 Dallas Parkway, Suite 400  
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All pleadings and other documents should be served upon GBTM's authorized representatives.

### **III. MOTION TO INTERVENE**

GBTM is the owner and developer of property identified by Oncor in its Application as directly affected by proposed segment "M3" of the Transmission Line.<sup>1</sup> Consequently, GBTM 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, GBTM moves to intervene as a party in this docket so that it may ensure its interests are protected.

### **IV. CONCLUSION AND PRAYER**

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

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<sup>1</sup> *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 140 (Jun. 8, 2023).

Respectfully submitted,

/s/ Hilary Liston

Hilary Liston, Esq.

SB# 00791786

General Counsel – Real Estate

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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.