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Filing Date - 2023-07-19 04:16:36 PM

Control Number - 55067

Item Number - 346

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

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	§ § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**TEXAS MUNICIPAL POWER AGENCY’S
MOTION TO INTERVENE**

Texas Municipal Power Agency (TMPA) files this Motion to Intervene (Motion) in the above-referenced proceeding pursuant to 16 Texas Administrative Code (TAC) §§ 22.103(b) and 22.104. In support thereof, TMPA respectfully shows the following:

I. INTRODUCTION

Oncor Electric Delivery Company, LLC (Oncor) filed an application to amend its certificate of convenience and necessity (CCN) for the Ramhorn Hill Switch – Dunham Switch 345 kilovolt (kV) Transmission Line Project in Denton and Wise Counties (Project) on June 8, 2023.¹ Accordingly, this Motion is timely filed.²

II. JUSTICIABLE INTEREST

TMPA has a justiciable interest in this proceeding and, therefore, standing to intervene in accordance with 16 TAC § 22.103(b). TMPA is a transmission service provider owned by the cities of Bryan, Denton, Garland, and Greenville, Texas. It owns and operates electric transmission assets throughout the state, including transmission assets in Denton County.

As contemplated, the Project interconnects to the proposed Dunham Switch in south Denton County.³ Several of the proposed routes and segments near Dunham Switch run parallel or cross TMPA’s transmission assets and, as such, the Project may adversely impact TMPA’s

¹ 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 (Jun. 8, 2023) (Application).

² See 16 TAC § 22.104(b).

³ See Application, Attachment 13 at Figure 1.

operations.⁴ TMPA, therefore, has “a justiciable interest which may be adversely affected by the outcome of this proceeding.”⁵

III. DESIGNATION OF REPRESENTATIVE

The contact information of TMPA’s authorized legal representative is as follows:

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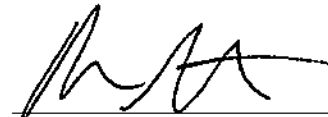
TMPA requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served upon TMPA’s authorized representative.

IV. PRAYER

TMPA respectfully asserts that it has a justiciable interest in this proceeding and prays that its Motion to Intervene be granted and that it be afforded full party status in this matter.

Respectfully submitted,

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**ATTORNEY FOR TEXAS MUNICIPAL
POWER AGENCY**

⁴ *Id.*

⁵ 16 TAC § 22.103(b).

CERTIFICATE OF SERVICE

I certify 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 July 19, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.



RICHARD A. ARNETT II