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

APPLICATION OF ONCOR ELECTRIC	\$
DELIVERY LLC TO AMEND ITS	Š
CERTIFICATE OF CONVENIENCE	§ PUBLIC UTILITY COMMISSION
AND NECESSITY FOR THE	\$
RAMHORN HILL – DUNHAM 345 KV	§ OF TEXAS
TRANSMISSION LINE IN DENTON	S
AND WISE COUNTIES	S

HENRY NORTHLAKE DEVELOPMENT LLC'S MOTION TO INTERVENE

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

NOW COMES Henry Northlake Development LLC ("Intervenor") and files this Motion to Intervene in the above-referenced proceeding. In support, Intervenor would respectfully show as follows:

I. BACKGROUND

1. 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

2. Intervenor's authorized representative is:

Christopher M. Lowry General Counsel Henry Northlake Development LLC 900 Parker Square, Suite 250 Flower Mound, Texas 75028 (972) 885-6998 clowry@henryinvestmentgroup.com

All pleadings and other documents should be served upon Intervenor's authorized representative.

III. <u>MOTION TO INTERVENE</u>

3. Intervenor is the owner and developer of property identified by Oncor in its Application as directly affected by proposed segment "G2" of the Transmission Line. See Application of Oncor Electric Delivery LLC to Amend its Certificate of Convenience and Necessity for the Ramborn Hill – Dunham 345 kV Transmission Line in Denton and Wise Counties, Docket No. 55067, Item 2, Attachment 8, line 1281 ("Listing of Directly Affected Land Owners for Notice"). Consequently, Intervenor has a direct, substantial, and justiciable interest that may be adversely affected by the outcome of this proceeding. Pursuant to 16 TAC §§22.52(a)(3), 22.101, 22.103(b), and 22.104, Intervenor hereby moves to intervene as a party in this docket so that it may ensure its interests are protected.

IV. <u>CONCLUSION AND PRAYER</u>

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

Respectfu	lly	su	bmitted	l,
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s/ Christopher M. Lowry
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ATTORNEY FOR INTERVENOR HENR

ATTORNEY FOR INTERVENOR HENRY NORTHLAKE DEVELOPMENT LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2023, a true and correct copy of the foregoing instrument was served on all parties of record by electronic mail.

s/ Christopher M. Lowry
Christopher M. Lowry