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**SOAH DOCKET NO. 473-23-21216
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APPLICATION OF ONCOR	§	BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY	§	
LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	OF
AND NECESSITY FOR THE	§	
RAMHORN HILL - DUNHAM 345	§	
KV TRANSMISSION LINE IN	§	
DENTON AND WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

**MOTION TO INTERVENE AND NOTICE OF COUNSEL
FOR TODD FAMILY HOLDINGS L.P.**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE (“ALJ”):

Todd Family Holdings L.P. (“Todd Family Holdings”) files this Motion to Intervene and Notice of Counsel in the above-referenced proceeding pursuant to the Public Utility Regulatory Act (“PURA”) and P.U.C. PROC. R. §§ 22.102, 22.103, and 22.104. Todd Family Holdings, Intervenor and Respondent, respectfully shows the following:

1. Motion to Intervene. On June 8, 2023, ONCOR Electric Delivery Company LLC (“Petitioner”), filed a Petition for Declaratory Order (the “Petition”) seeking a declaration to amend its certificate of convenience and necessity for the Ramhorn Hill-Dunham 345-KV transmission line in Denton and Wise Counties.

2. Todd Family Holdings is a landowner in Denton County and will be directly affected by any determination of the Petition. Todd Family Holdings, therefore, has a justiciable interest that may be adversely affected by the outcome of the Petition.

3. Todd Family Holdings requests that its Motion to Intervene be granted, seeks to be classified as “respondent” pursuant to PUC SUBST. R. § 22.102(a), and requests that it be permitted to participate fully in these proceedings.

4. Notice of Counsel. Todd Family Holdings will be represented by:

David F. Brown
State Bar No. 03108700
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Ewell, Brown, Blanke & Knight, LLP
111 Congress Avenue, Suite 2800
Austin, Texas 78701
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5. Service. All communications, pleadings, and other documents should be served upon Intervenor by and through its counsel, as set forth above.

6. Conclusion and Prayer. For the above-stated reasons, Todd Family Holdings respectfully requests that the Commission grant this Motion to Intervene, accept notice of the counsel upon whom all notices and filings should be served, and grant such other and further relief to which it may be justly entitled.

Respectfully submitted,

EWELL, BROWN, BLANKE & KNIGHT LLP

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Counsel for Todd Family Holdings L.P.

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 who have provided an e-mail address on July 21, 2023, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ David F. Brown

David F. Brown