



## **Filing Receipt**

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**Item Number - 546**

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

<b>APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL TO DUNHAM 345 KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE STATE OFFICE    OF   ADMINISTRATIVE HEARINGS</b>
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**HILLWOOD PARTIES' MOTION TO INTERVENE**

Pursuant to the Public Utility Regulatory Act (“PURA”), Tex. Util. Code Ann. §§ 11.01 et seq., and 16 Tex. Admin. Code (TAC) §§ 22.102, 22.103(b)(2) and 22.104, Eagle Income Properties, LP, AIL Investment, L.P., Petrus Investment, L.P., HW Indian Springs, L.P., HWC Justin 407, LLC, HP Gibbs, LP, Pecan Square Phase 1, LLC, Pecan Square Phase 2A, LLC, Pecan Square Phase 2B, LLC, Pecan Square Phase 3A, LLC, and Pecan Square Phase 3B, LLC (each a “Hillwood Party,” and collectively, the “Hillwood Parties”) file this Motion to Intervene. In support, the Hillwood Parties respectfully show as follows:

**I. BACKGROUND**

On June 8, 2023, Oncor Electric Delivery Company LLC (“Oncor”) filed an application to amend a Certificate of Convenience and Necessity for a proposed 345-kV transmission line in Denton and Wise Counties, Texas.

**II. STANDING TO INTERVENE**

Each Hillwood Party is a directly affected landowner who received notice from Oncor. Multiple proposed routes cross or otherwise directly affect the Hillwood Parties’ property, as reflected in Oncor’s application. Hillwood Parties own the following tracts identified by Oncor in its application as “Directly Affected Landowners”: 803, 806, 807, 1106, 1107, 1108, 1110, 1270, 1271, 1272, 1273, 1273.1, 1275, 1287, 1288.1, 1326.01, 1326.02, 1326.03, 1326.04, 1330, 1331, 1331.01, 1332, 1351, 1352, 1356, 1357, 1358, 1503, 1891.

Accordingly, each of the Hillwood Parties have a justiciable interest in the outcome of this proceeding and, on that basis, seek to be admitted as intervenors. The interests of the Hillwood Parties are physically and legally different from any other party; thus, no other party can adequately represent their interests.

### **III. AUTHORIZED REPRESENTATIVES**

The Hillwood Parties, hereby designate the following individuals as their authorized representatives for purposes of this proceeding and request that all pleadings, notices, correspondence, or other documents be served on them:

Andrew Kever  
State Bar No. 11367050  
Carolyn E. Shellman  
State Bar No. 18196200  
Christopher J. Kirby  
State Bar No. 24116620  
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The Hillwood Parties request that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on the Hillwood Parties' above-listed representatives.

#### **IV. PRAYER**

The Hillwood Parties respectfully request that its motion to intervene be granted, that the Hillwood Parties be allowed to participate as a party in this proceeding, and that they receive such other and further relief to which they may be entitled.

**Respectfully submitted,**

**ENOCH KEVER PLLC**  
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By: Christopher J. Kirby  
**ATTORNEYS FOR THE HILLWOOD  
PARTIES**

#### **CERTIFICATE OF SERVICE**

I certify that a copy of this document was served by electronic mail, on all parties of record in this proceeding on July 21, 2023, in accordance with SOAH Order No. 2 in the above-styled proceeding and the Commission's Second Order Suspending Rules, issued in Project No. 50664.

Beth Mitchell  
Beth Mitchell