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**SOAH DOCKET NO. 473-23-21357
PUC DOCKET NO. 55114**

APPLICATION OF TEXAS-NEW MEXICO POWER COMPANY TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED PILOT POINT 138-KV TRANSMISSION LINE PROJECT IN COLLIN, GRAYSON, AND/OR DENTON COUNTIES	§ § § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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MOTION TO INTERVENE OF MM CELINA 40, LLC

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COMES MM CELINA 40, LLC, a Texas limited liability company (“Intervenor”), pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104, and files this Motion to Intervene in the above-captioned docket. In support thereof, Intervenor respectfully shows the following:

I. BASIS FOR INTERVENTION

Intervenor has a justiciable interest in this proceeding as Intervenor owns property that may be directly impacted by one or more of the routes for the Texas-New Mexico Power Company (“TNMP”) proposed Pilot Point 138-KV Transmission Line Project. Intervenor has received notice from TNMP that Intervenor’s property may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52(a)(3), by the proposed transmission line that is the subject of this proceeding. Intervenor, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). This Motion to Intervene is filed before July 24, 2023, and therefore is timely filed.

II. ACKNOWLEDGEMENTS

Intervenor acknowledges: (1) Intervenor will be a party to the case; (2) Intervenor will be required to respond to all discovery requests from other parties in the case; (3) if Intervenor files testimony, other parties may cross-examine him at the hearing; (4) if Intervenor files any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) Intervenor is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

III. NOTICE OF APPEARANCE

Attorneys Travis L. Boghetich and Caitlin P. Simmons, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor. Intervenor desires to be parties to the above-styled and docketed proceeding and have input in the routing process.

Accordingly, Intervenor requests that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon their counsel as follows:

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IV. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that this Motion to Intervene be granted and that Intervenor be granted and allowed to participate in this proceeding as a party with all rights thereof to the full extent Intervenor desires to do so, and for such further relief to which Intervenor may be entitled.

Respectfully submitted,

/s/ Travis L. Boghetich
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