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**SOAH DOCKET NO. 473-23-26934
PUC DOCKET NO. 55365**

APPLICATION OF CENTERPOINT	§	
ENERGY HOUSTON ELECTRIC, LLC	§	BEFORE THE STATE OFFICE
TO AMEND A CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY FOR	§	OF
A 138-KV TRANSMISSION LINE	§	
WITHIN CHAMBERS COUNTY	§	ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE BY HERMAN LOWERY

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, Herman Lowery (hereafter “Mr. Lowery”), files this Motion to Intervene. In support, Mr. Lowery respectfully shows as follows:

I. BACKGROUND

On August 30, 2023, CenterPoint Energy Houston Electric, LLC (hereafter “Applicant”) filed an application to amend its Certificates of Convenience and Necessity for a proposed 138-kV transmission line in Chambers County, Texas.

II. STANDING TO INTERVENE

Mr. Lowery¹ is a directly affected landowner who received notice from the Applicant. Multiple proposed routes cross or otherwise directly affect the Lowery property, as reflected in the application. Mr. Lowery owns the following Parcels identified by Applicants in its application as “Directly Affected Landowners”: 10485, 12784 and 30359.

Accordingly, Mr. Lowery has a justiciable interest in the outcome of this proceeding and, on that basis, seeks to be admitted as an intervenor. The interests of Mr. Lowery are physically and legally different from any other party; thus, no other party can adequately represent his interests.

¹ Herman Lowery is married to Ursula Lowery. The property at issue is held as their community property, and Mr. Lowery acts on behalf of himself and Mrs. Lowery.

III. AUTHORIZED REPRESENTATIVE

Mr. Lowery, hereby designates the following individuals as his authorized representatives for purposes of this proceeding:

Richard G. Baker
State Bar No. 01589210
BAKER & ZBRANEK, P.C.
P.O. Box 10066
1935 Trinity
Liberty, TX 77575
(936) 336-6677 (phone)
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Andrew Kever
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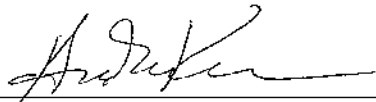
Mr. Lowery requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on his above-listed representatives.

IV. PRAYER

Mr. Lowery respectfully requests that his motion to intervene be granted, that he be allowed to participate as a party in this proceeding, and that he receives such other and further relief to which he may be entitled.

Respectfully submitted,

ENOCH KEVER PLLC
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Christopher J. Kirby
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By: 
ATTORNEYS FOR
Herman Lowery

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 September 27, 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