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

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

MOTION TO INTERVENE OF ELIZABETH CRAVENS

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COMES Elizabeth Cravens (“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:

1. On August 30, 2023, CenterPoint Energy Houston Electric, LLC (“CenterPoint”) filed its Application to Amend a Certificate of Convenience and Necessity for a 138-KV Transmission Line Within Chambers County. CenterPoint filed with its application a list of landowners that could be directly affected by one or more of the proposed segments. CenterPoint’s list included Intervenor as the owner of property in Chambers County, Texas.

2. Intervenor has a standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenor has a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain property in Chambers County is owned by Intervenor. Intervenor has received notice from CenterPoint that their said 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. This Motion to Intervene is filed on September 29, 2023, and therefore is timely filed.

3. Attorneys Tyler Topper and Christian Stewart, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor. Intervenor desires to be a party to the above-styled and docketed proceeding and have input in the routing process.

4. For these reasons, good cause exists to grant Intervenor’s request to intervene pursuant to P.U.C. Proc. R. 22.104.

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

Tyler Topper
Texas Bar No. 24059263
ttopper@mw-law.com
Christian Stewart
Texas Bar No. 24013569
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MORGAN WILLIAMSON LLP
701 South Taylor, Suite 440
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Telephone: (806) 358-8116
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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,

MORGAN WILLIAMSON LLP
701 South Taylor, Suite 440
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

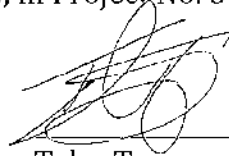
By: 

Tyler Topper
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ATTORNEYS FOR INTERVENOR

CERTIFICATE OF SERVICE

I certify a copy of this document is being filed in the Public Utility Commission's Interchange System and served on all parties of record as required by orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020, in Project No. 50664.

A handwritten signature in black ink, appearing to read 'Tyler Topper', is written over a horizontal line.

Tyler Topper