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SOAH DOCKET NO. 473-25-12927 DOCKET NO. 57648

APPLICATION OF ENTERGY TEXAS, **BEFORE THE** §. INC. TO AMEND ITS CERTIFICATE OF § CONVENIENCE AND NECESSITY § FOR THE SETEX AREA RELIABILITY STATE OFFICE OF § PROJECT IN JASPER. § MONTGOMERY, NEWTON, POLK, § SAN JACINTO, TRINITY, TYLER, AND ADMINISTRATIVE HEARINGS § WALKER COUNTIES § §

BEVERLY JEFFERSON'S MOTION TO INTERVENE

NOW COMES BEVERLY JEFFERSON, who timely files this MOTION TO INTERVENE, respectfully showing as follows:

1. BEVERLY JEFFERSON owns property that may be affected by the outcome of this proceeding, is a directly affected landowner, and has a justiciable interest in this proceeding. See P.U.C. PROC. R. 22.103(b)(2); P.U.C. PROC. R. 22.52 (a)(3).

2. BEVERLY JEFFERSON acknowledges that if granted Intervenor status she (1) will be a party to the case; (2) will be required to respond to all discovery requests from other parties in the case; (3) may cross-examine other witnesses or be cross examined at the hearing if she files direct testimony; (4) will serve every other party in this case, except where service is modified by alternative service procedures set out by order in these proceedings, if they file any document in these proceedings; and (5) is bound by the Procedural Rules of the Texas Public Utility Commission and the State Office of Administrative Hearings.

3. The Commission has jurisdiction over this case and BEVERLY JEFFERSON pursuant to PURA § 37.053.

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PRAYER

WHEREFORE PREMISES CONSIDERED, and for the above-stated purposes, BEVERLY JEFFERSON respectfully requests that this MOTION TO INTERVENE be granted and that she may go henceforth and be permitted to fully participate in these proceedings, and for such other and further relief, both in law and in equity, to which she is justly entitled.

Respectfully submitted,

SPIVEY VALENCIANO, PLLC

McAllister Plaza – Suite 130 9601 McAllister Freeway San Antonio, Texas 78216 Telephone: (210) 787-4654 Facsimile: (210) 201-8178

By:

James K. Spivey jkspivey@svtxlaw.com State Bar No. 00794680 Soledad M. Valenciano State Bar No. 24056463 svalenciano@svtxlaw.com

ATTORNEYS FOR BEVERLY JEFFERSON

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2025, the foregoing document was filed in Docket No. 57648 in compliance with PUC Procedural Rule 22.74 and Orders issued to date.

Soledad M. Valenciano