



## **Filing Receipt**

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**Item Number - 15**

**SOAH DOCKET NO 473-25-22942  
PUC DOCKET NO. 58264**

<b>APPLICATION OF AEP TEXAS INC.</b>	<b>§</b>	<b>BEFORE THE</b>
<b>TO AMEND ITS CERTIFICATE OF</b>	<b>§</b>	
<b>CONVENIENCE AND NECESSITY</b>	<b>§</b>	
<b>FOR THE ARANSAS PASS-TO-</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>GREGORY 138-KV TRANSMISSION</b>	<b>§</b>	
<b>LINE IN SAN PATRICIO COUNTY</b>	<b>§</b>	
	<b>§</b>	<b>OF TEXAS</b>

**NOTICE MOTION TO INTERVENE OF CYNTHIA LOUISE HUNT**

NOW COMES, Cynthia Louise Hunt, individually; as Manager of JWHJ Land Holdings LLC; as Manager of Heirs of Joseph F. Green, a Texas general partnership; and as Attorney-in-Fact for Janet Parks, Hubbard S. Parks, Richard A. Jacoway, Jr., Donna J. Hunt, Mary Jo Parks North (as Trustee of the Mary Jo Parks North Living Trust), Russell Weir, Richard Weir, Myra K. Friedman, Fay K. Garlick, Lyda R. Harper, Christian L. Harper and Letha R. McClure, pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this her Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully show the following:

**I. AUTHORIZED REPRESENTATIVE**

Attorney H. Scott Taylor pursuant to P.U.C. PROC. R. 22.101(a), hereby notices his appearance as counsel on behalf of Cynthia Louise Hunt, individually; as Manager of JWHJ Holdings LLC; as Manager of Heirs of Joseph F. Green, a Texas general partnership; and as Attorney-in-Fact for Janet Parks, Hubbard S. Parks, Richard A. Jacoway, Jr., Donna J. Hunt, Mary Jo Parks North (as Trustee of the Mary Jo Parks North Living Trust), Russell Weir, Richard Weir,

Myra K. Friedman, Fay K. Garlick, Lyda R. Harper, Christian L. Harper and Letha R. McClure in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, telephone number, and service e-mail of Intervenor's authorized representative is as follows:

H. Scott Taylor  
**BRANSCOMB LAW**  
802 N. Carancahua, Suite 2300  
Corpus Christi, Texas 78401  
361-886-3807 (telephone)  
361-886-3805 (fax)  
Email: staylor@branscomblaw.com

Intervenor 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 said authorized representative.

## **II. JURISDICTION**

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

## **III. BASIS FOR INTERVENTION**

Intervenor has a justiciable interest in this proceeding. Intervenor owns properties that may be directly impacted by one or more of the routes for AEP Texas Inc.'s ("Petitioner") proposed Aransas Pass-to Gregory transmission line project. Intervenor has been notified by Petitioner that her properties 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 docket. Intervenor, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). The Motion to Intervene is filed within 30 days of the date Petitioners filed their Application and therefore is timely under P.U.C. PROC.

R. 22.104(b). Intervenor requests that this Motion to Intervene be granted and that she be recognized as a party.

#### **IV. ACKNOWLEDGEMENTS**

Intervenor acknowledges: (1) she will be party to the case; (2) she will be required to respond to all discovery requests from other parties in the case; (3) if she files testimony, other parties may cross-examine it at the hearing; (4) if she 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) she is bound by the Procedural Rules of the Public Utility Commission of Texas.

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

Respectfully submitted,

BRANSCOMB LAW  
802 N. Carancahua, Suite 2300  
Corpus Christi, Texas 78401  
361-886-3807 (telephone)  
361-886-3805 (fax)

/s/H. Scott Taylor

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**ATTORNEY FOR CYNTHIA LOUISE HUNT,  
INDIVIDUALLY; AS MANAGER OF JWHJ  
LAND HOLDINGS LLC; AS MANAGER OF  
HEIRS OF JOSEPH F. GREEN, A TEXAS  
GENERAL PARTNERSHIP; AND AS  
ATTORNEY-IN-FACT FOR JANET PARKS,  
HUBBARD S. PARKS, RICHARD A  
JACOWAY, JR., DONNA J. HUNT, MARY JO  
PARKS NORTH (AS TRUSTEE OF THE  
MARY JO PARKS NORTH LIVING TRUST),  
RUSSELL WEIR, RICHARD WEIR, MYRA K.  
FRIEDMAN, FAY K. GARLICK, LYDA R.  
HARPER, CHRISTIAN L. HARPER AND  
LETHA R. MCCLURE**

**CERTIFICATE OF SERVICE**

I certify that on July 22, 2025, this document is being provided to all parties of record by electronic mail and is being filed in the Public Utility Commission's Interchange system maintained by the Central Records Division of the Public Utility Commission of Texas.

/s/H. Scott Taylor  
H. Scott Taylor