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DOCKET NO. 50410



JOINT APPLICATION OF WIND § PUBLIC UTILITY COMMISSION
ENERGY TRANSMISSION TEXAS, LLC §
AND ONCOR ELECTRIC DELIVERY § OF TEXAS
COMPANY LLC TO AMEND THEIR §
RESPECTIVE CERTIFICATES OF §
CONVENIENCE AND NECESSITY FOR §
THE PROPOSED BEARKAT SWITCHING §
STATION TO LONGSHORE SWITCHING §
STATION 345KV TRANSMISSION LINE §
IN GLASSCOCK AND HOWARD §
COUNTIES §

MOTION TO INTERVENE FOR CHAIS A. AND KATRINA V. GOODWIN

Pursuant to P.U.C. PROC. R. §§ 22.101, 22.102(a)(3), 22.103, and 22.104, **Chais A. and Katrina V. Goodwin**, as Intervenor, file this Motion to Intervene in the above-styled case.

**I.
AUTHORIZED REPRESENTATIVE**

The following individual is the authorized representative for the above-named individuals for the purpose of this proceeding:

Wm. Keith Davis, Attorney
Hay, Wittenburg, Davis, Caldwell & Bale, L.L.P.
1 East Twohig, Third Floor
San Angelo, Texas 76903
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All correspondence, pleadings, discovery, discovery responses, and any other documents should be served on the above-named representative. Service by electronic mail is the preferred method.

II.
STANDING TO INTERVENE

On January 14, 2020, Wind Energy Transmission Texas, LLC ("WET") and Oncor Electric Delivery Company LLC ("Oncor") filed its joint application to amend its certificates for convenience and necessity for the proposed Bearkat Switching Station to Longshore Switching Station 345kV transmission line in Glasscock and Howard Counties, Texas. Chais A. and Katrina V. Goodwin are landowners who could be affected by the aforementioned transmission line project. Therefore, they are entitled to participate as an intervenor in this case.

III.
CONCLUSION

WHEREFORE, PREMISES CONSIDERED, Chais A. and Katrina V. Goodwin, owners of affected property, request intervention in the above-styled proceeding and respectfully request the Administrative Law Judge grant their motion to intervene in this proceeding and any and all other relief for which they are entitled.

Respectfully submitted,

HAY, WITTENBURG, DAVIS, CALDWELL
& BALE, L.L.P.

By: /s/ Wm. Keith Davis
WM. KEITH DAVIS
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ATTORNEY FOR CHAIS A. AND
KATRINA V. GOODWIN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served by email on all parties of record who have provided an email address, on this the 22nd day of June, 2020, in accordance with the Commission's Order Suspending Rules issued on March 16, 2020, in Project No. 50664.

By: /s/ Wm. Keith Davis
WM. KEITH DAVIS