

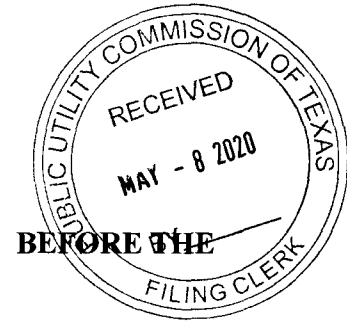
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PUC DOCKET NO. 50669



APPLICATION OF SOUTHWESTERN §  
ELECTRIC POWER COMPANY TO §  
AMEND ITS CERTIFICATE OF §  
CONVENIENCE AND NECESSITY FOR §  
THE SWEPCO MORTON CUT-IN TO §  
THE WOOD COUNTY ELECTRIC §  
COOPERATIVE E BURGESS CUT-IN §  
138-KV TRANSMISSION LINE IN VAN §  
ZANDT COUNTY §

PUBLIC UTILITY COMMISSION  
OF TEXAS

**MALLAT FARMS LLC'S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Mallat Farms, LLC ("Mallat Farms"), pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this their Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

**I. AUTHORIZED REPRESENTATIVE**

Attorneys Patrick L. Reznik and Carly Barton pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Mallat Farms in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor's authorized representatives is as follows:

Patrick L. Reznik  
**BRAUN & GRESHAM, PLLC**  
P.O. Box 1148  
Dripping Springs, Texas 78620  
512-894-5426 (telephone)  
512-894-3405 (fax)  
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Mallat Farms 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 representatives.

## **II. JURISDICTION**

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

## **III. BASIS FOR INTERVENTION**

Mallat Farms has a justiciable interest in this proceeding. Mallat Farms owns property that may be directly impacted by one or more of the routes for Southwestern Electric Power Company's ("SWEPCO") proposed Morton Cut-In to the Wood County Electric Cut-In 138-kV transmission line project. Mallat Farms has been notified by SWEPCO that their 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 docket. Mallat Farms, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). The Motion to Intervene is filed within 45 days of the date SWEPCO filed their Application and therefore is timely under P.U.C. PROC. R. 22.104(b). Mallat Farms requests that this Motion to Intervene be granted and that they be recognized as a party.

## **IV. ACKNOWLEDGEMENTS**

Mallat Farms acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if they file testimony, other parties may cross-examine them at the hearing; (4) if they file 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) they are bound by the

Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Mallat Farms respectfully requests that this Motion to Intervene be granted, that they 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 they may be entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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/s/Patrick L. Reznik

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**ATTORNEYS FOR MALLAT FARMS LLC**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on May 8, 2020 in accordance with Public Utility Commission Procedural Rule 22.74.

/s/Patrick L. Reznik

Patrick L. Reznik