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PUC DOCKET NO. 50669



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

MOTION TO INTERVENE OF JOE L. SELLERS, JR. AND CHARLOTTE SELLERS

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COMES Joe L. Sellers, Jr. and Charlotte Sellers ("Intervenors") 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 respectfully shows the following:

1. On March 31, 2020, Southwestern Electric Power Company ("SWEPCO") filed its Application for a Certificate of Convenience and Necessity for a 138-kV Transmission Line in Van Zandt County. SWEPCO filed with its application a list of landowners that could be directly affected by one or more of the proposed segments. SWEPCO's list included Intervenors as the owners of property in Van Zandt County, Texas.

2. Intervenors have standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenors have a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain property in Van Zandt County is owned by Intervenors. Intervenors have received notice from SWEPCO that Intervenors' 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 before May 15, 2020 and therefore is timely filed.

3. Attorney Tyler Topper, pursuant to P.U.C. PROC. R. 22.101(a), hereby notices his appearance as counsel on behalf of Intervenors. Intervenors desire 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:

BURDETT MORGAN WILLIAMSON & BOYKIN, LLP

Tyler Topper – ttopper@bmwb-law.com

701 South Taylor, Suite 440

Amarillo, Texas 79101

Telephone: (806) 358-8116

Facsimile: (806) 350-7642

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,

BURDETT, MORGAN, WILLIAMSON & BOYKIN, L.L.P.

701 South Taylor, Suite 440

Amarillo, Texas 79101

Telephone: (806) 358-8116

Facsimile: (806) 350-7642

By: 

Tyler Topper

State Bar No. 24059263

E-Mail: ttopper@bmwb-law.com

ATTORNEY FOR INTERVENORS

CERTIFICATE OF SERVICE

I certify that on the 14th day of May, 2020 a true and correct copy of the foregoing document will be served on all parties of record in this proceeding via e-mail.¹



Tyler Topper

¹ *Issues Related to the State of Disaster for the Coronavirus Disease 2019*, Docket No. 50664, Order Suspending Rules (March 16, 2020).