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DOCKET NO. 51023



APPLICATION OF THE CITY OF §
SAN ANTONIO, ACTING BY AND §
THROUGH THE CITY PUBLIC §
SERVICE BOARD (CPS ENERGY) TO §
AMEND ITS CERTIFICATE OF §
CONVENIENCE AND NECESSITY §
FOR THE PROPOSED SCENIC LOOP §
138-KV TRANSMISSION LINE §
PROJECT IN BEXAR COUNTY, §
TEXAS §

PUBLIC UTILITY COMMISSION

OF TEXAS

**THE SAN ANTONIO ROSE PALACE, INC.'S AND STRAIT PROMOTIONS,
INC.'S JOINT MOTION TO INTERVENE**

The San Antonio Rose Palace, Inc. ("Rose Palace") and Strait Promotions, Inc. ("Strait Promotions"), pursuant to the Public Utility Regulatory Act ("PURA"), TEX UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, file this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

I. Authorized Representatives

The names, address, and telephone number of the authorized representatives for Rose Palace and Strait Promotions are:

Luke E. Kraus
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All pleadings and other documents should be served upon the authorized representatives for Rose Palace and Strait Promotions.

II. Basis for Intervention

On July 22, 2020, the City of San Antonio, acting by and through the City Public

Service Board (CPS Energy), filed an application requesting approval to amend its Certificate of Convenience and Necessity (“CCN”) to construct the Scenic Loop 138-kV Transmission Line Project in Bexar County.

Rose Palace and Strait Promotions own properties that may be affected by the outcome of this proceeding, are directly affected landowners, and have justiciable interests in this proceeding. See P.U.C. PROC. R. 22.103(b)(2) and P.U.C. PROC. R. 22.52(a)(3). More specifically, Rose Palace and Strait Promotions have been notified by CPS Energy that their properties may be directly affected, as that term is defined in P.U.C. PROC. R. 22(a)(3), by the proposed Scenic Loop 138-kV Transmission Line Project. Therefore, Rose Palace and Strait Promotions have standing to intervene pursuant to P.U.C. PROC. R. 22.103(b)(2). This Motion to Intervene is filed within 45 days of the date CPS Energy filed its application in this proceeding and therefore is timely under P.U.C. PROC. R. 22.104(b).

III. Prayer

Rose Palace and Strait Promotions respectfully request that the Commission grant this Motion to Intervene and admit Rose Palace and Strait Promotions as intervenors in this proceeding for all purposes, and for such other relief to which they may be justly entitled.

Respectfully submitted,

BARTON BENSON JONES PLLC

/s/ Luke E. Kraus

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ATTORNEYS FOR THE SAN ANTONIO ROSE PALACE, INC.
AND STRAIT PROMOTIONS, INC.

Certificate of Service

I, Luke E. Kraus, counsel for The San Antonio Rose Palace, Inc. and Strait Promotions, Inc., hereby certify that on the 28th day of August, 2020 a copy of the foregoing pleading was served on all parties by electronic mail, in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ Luke E. Kraus

Luke E. Kraus