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PUC DOCKET NO. 51023

APPLICATION OF THE CITY OF SAN ANTONIO TO AMEND ITS CERTIFICATE OF PUBLIC UTILITY OF CONVENIENCE AND NECESSITY FOR THE SCENIC LOOP 138-KV TRANS. LINE IN BEXAR COUNTY, TX

2020 SEP -1 AM 9:35
FILED IN PUBLIC UTILITY DIVISION

MARGARET COUCH FIRST SUPPLEMENT TO HER MOTION TO INTERVENE AND RESPONSE IN OPPOSITION TO BEXAR RANCH L.P.'S MOTION FOR CLARIFICATION, etc.

Comes now Margaret Couch, Intervenor in the above styled and number proceeding respectfully submitting this her First Supplement to her Motion to Intervene and Response In Opposition to Bexar Ranch L.P.'s Motion For Clarification, etc. and for cause would show as follows:

1. Intervenor incorporates by reference PATRICK CLEVELAND'S MOTION IN OPPOSITION TO BEXAR RANCH, L.P.'S 'MOTION FOR CLARIFICATION OF IINTERVENOR STANDING AND TO SHOW CAUSE" as if set forth fully herein.
- 2, Intervenor owns property within the Anaqua Springs Ranch subdivision. Intervenor is a member of the Anaqua Springs Ranch Homeowner's Association (ASRHOA). One or more of the proposed routes crosses property owned by ASRHOA and will consist of a "taking" of said property or some part thereof in the event it is constructed. Intervenor therefore owns an interest in property directly affected by the proposed routes. Intervenor thus has a justiciable interest in the taking of said property. Even so, Intervenor respectfully notes that the right to intervene does not require so much as a justiciable interest, but merely an "interest in the application ...".
Tex. Util. Code 537.054
3. In addition to the above, Intervenor owns improved property in Anaqua Springs subdivision that is in close proximity to one of the proposed routes or route segments, and/or is directly affected by at least three of the possible alternatives due to the "blanket" effect of boxing in ASR with possible alternatives. Thus, Intervenor owns property that will be directly affected by the outcome of this proceeding.

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