

Control Number: 51023

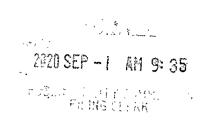


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PUC DOCKET NO. 51023

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



MARGARET COUCH FIRST SUPPLEMENT TO HER MOTION TO INTERVENE AND RESPONSE !N 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  $\dots$ ".

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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