



Control Number: 51023



Item Number: 149

Addendum StartPage: 0

PUC DOCKET NO. 51023



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

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PUBLIC UTILITY
COMMISSION OF TEXAS

LYNN GINADER FIRST SUPPLEMENT TO HIS MOTION TO INTERVENE AND RESPONSE IN OPPOSITION TO BEXAR RANCH L.P.'S MOTION FOR CLARIFICATION, etc.

Comes now Lynn Ginader, Intervenor(s) in the above styled and number proceeding respectfully submitting this (their, his, her) First Supplement to (their, his, 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(s) incorporate by reference PATRICK CLEVELAND'S MOTION IN OPPOSITION TO BEXAR RANCH, L.P.'S "MOTION FOR CLARIFICATION OF INTERVENOR STANDING AND TO SHOW CAUSE" as if set forth fully herein.

2. Intervenor(s) own(s) property within the Anaqua Springs Ranch subdivision. Intervenor(s) is members 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(s) therefore own(s) 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(s) respectfully note that the right to intervene does not require so much as a justiciable interest, but merely an "interest in the application ...".
Tex. Util. Code §37.054

3. In addition to the above, Intervenor(s) own 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(s) own(s) property that will be directly affected by the outcome of this proceeding.

4. Intervenor(s) respectfully point(s) out that all of the above information is contained, even if by inference, in the form Motion previously filed and is at least equal to the grounds given for standing by Bexar Ranch, L.P.'s own Motion to Intervene. In addition, in its Motion for Clarification, Bexar Ranch gave no substantive reason why Intervenor(s) lack standing *nor even why their standing should be questioned*. Overall its motivation for even filing the Motion remains unclear.

PRAYER

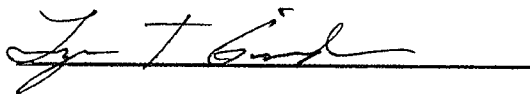
For the reasons given, Intervenor(s) respectfully request that Bexar Ranch, L.P.'s Motion for Clarification Of Intervenor Standing And To Show Cause be denied or dismissed and/or alternatively that Intervenor(s) Motion to Intervene as Supplemented be GRANTED.

Respectfully submitted,

Lynn Ginader
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CERTIFICATE OF SERVICE

I certify I served the foregoing on all parties of record by email this 31 day of August, 2020.



PUC DOCKET NO. 51023

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

**BEXAR RANCH, L.P.'S MOTION FOR CLARIFICATION OF INTERVENOR
STANDING AND TO SHOW CAUSE**

Now comes BEXAR RANCH, L.P., an Intervenor in these proceedings, and files this MOTION FOR CLARIFICATION OF INTERVENOR STANDING AND TO SHOW CAUSE. BEXAR RANCH, L.P., respectfully shows as follows:

1. The individuals (shown on the table below taken from the PUC Interchange) have filed intervention forms; however, they are not identified as affected landowners on Attachment 8 of Applicant's Application.

2. It is unclear from each filing whether the filer has standing to intervene in these proceedings. Many are seemingly identical filings with the same "attachment."

3. Accordingly, before any one of these filers are granted Intervenor status, BEXAR RANCH, L.P., respectfully requests that each of the filers listed below be ordered to clarify and/or show cause why that filer would have standing.

4. For clarification, Item No. 85 corresponds with Elis Latorre-Gonzalez and Item No. 90 corresponds with David Walts.

Control #	Item #	File Stamp	Filing Party	Filing Description
51023	30	08/17/2020	CHRIS & MICHELLE BOOTH	REQUEST TO INTERVENE
51023	31	08/17/2020	GEOFFREY GRANT	REQUEST TO INTERVENE
51023	32	08/17/2020	KRISTINA STROUD	REQUEST TO INTERVENE

51023	33	08/17/2020	KIMBERLY URY	REQUEST TO INTERVENE
51023	34	08/17/2020	MONICA AND CHRIS CASADY	Proposed CPS Tower project located at the entrance of our neighborhood: Anaqua Springs Ranch.
51023	35	08/17/2020	CHRISTOPHER STROUD	REQUEST TO INTERVENE
51023	36	08/18/2020	JAMES G BRIGHAM	REQUEST TO INTERVENE
51023	37	08/18/2020	MIKE LEONARD	REQUEST TO INTERVENE
51023	38	08/18/2020	DAVID BURKE	REQUEST TO INTERVENE
51023	39	08/18/2020	EDWARD CHALUPA	REQUEST TO INTERVENE
51023	40	08/18/2020	KUPFERSCHMID	REQUEST TO INTERVENE
51023	42	08/18/2020	SOPHIA POLK	REQUEST TO INTERVENE
51023	43	08/18/2020	RODOLFO SANTOSCOY	REQUEST TO INTERVENE
51023	44	08/18/2020	JOY ESCRIVA	REQUEST TO INTERVENE
51023	45	08/18/2020	MICHAEL ESCRIVA	REQUEST TO INTERVENE
51023	46	08/18/2020	MARK A SIEGEL	REQUEST TO INTERVENE
51023	47	08/18/2020	MARICELA SIEGEL	REQUEST TO INTERVENE
51023	49	08/18/2020	JAMES GALUSHA	REQUEST TO INTERVENE
51023	50	08/18/2020	MARLIN SWEIGART	REQUEST TO INTERVENE
51023	51	08/18/2020	SUZAN CORRAL	REQUEST TO INTERVENE
51023	52	08/18/2020	JAMES GILLINGHAM	REQUEST TO INTERVENE
51023	54	08/19/2020	ISLAM HINDASH	Anaqua springs
51023	56	08/19/2020	SCOTT E STREIFERT	REQUEST TO INTERVENE
51023	59	08/20/2020	DONNA M BALLI	REQUEST TO INTERVENE
51023	60	08/20/2020	JUDITH A CATALON	REQUEST TO INTERVENE
51023	61	08/20/2020	ISLAM HINDASH	REQUEST TO INTERVENE
51023	66	08/24/2020	THE DEITCHLE FAMILY TRUST	Scenic Loop 138 KV Transmission Line and Substation Project
51023	67	08/24/2020	RONALD SCHAPPAUGH	Request to Intervene in PUC Docket No 51023, Regarding new CPS high tension power line on Toutant Beaugard Rd
51023	68	08/24/2020	RICHARD HAUPTFLEISCH	Opposition to the proposed location of the Scenic Loop 138-KV transmission line in Bexar County.
51023	69	08/24/2020	JOEL COMP	opposition to the proposed location of the scenic loop 138-kv transmission line in bexar county
51023	72	08/24/2020	ALAN HIBBERD	REQUEST TO INTERVENE
51023	73	08/24/2020	DAVID WALTZ	REQUEST TO INTERVENE

51023	75	08/25/2020	JAMES MIDDLETON	138kv Scenic loop transmission lines project
51023	76	08/25/2020	DANIEL LONERGAN	OPPOSITION TO THE PROPOSED LOCATION OF THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY
51023	77	08/25/2020	CORTNEY COMP	Opposition to the proposed location of the scenic loop 138-KV transmission line in bexar county
51023	79	08/25/2020	JIM FLORES	OPPOSITION TO THE PROPOSED LOCATION OF THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY
51023	82	08/25/2020	CHANDLER MROSS	Opposition to the proposed location of the scenic loop 138-KV transmission line in Bexar County.
51023	83	08/25/2020	ROBERTO A SANCHEZ	Opposition to the proposed location of the scenic loop 138-KV transmission line in Bexar county.
51023	85	08/25/2020	PLEADINGS	OPPOSITION TO THE PROPOSED LOCATION AND TRANSMISSION LINE ROUTE OF THE 138-KV OF THE SCENIC LOOP SUBSTATION IN BEXAR COUNTY.
51023	88	08/25/2020	GREGORY GODWIN	OPPOSITION TO THE PROPOSED LOCATION OF THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY
51023	89	08/25/2020	SONIA VILLARREAL	Don't want Cps towers anywhere near my property or Neighborhood (ASR)!!! OPPOSITION TO THE PROPOSED LOCATION OF THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY)
51023	90	08/26/2020	ASR HOA	REQUEST TO INTERVENE

51023	91	08/26/2020	MICHAEL AND MARIA ROXANA HOPE-JONES	OPPOSITION TO THE PROPOSED LOCATION OF THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY)
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PRAYER

WHEREFORE PREMISES CONSIDERED, and for the above-stated purposes, BEXAR RANCH, L.P., requests that this MOTION FOR CLARIFICATION OF INTERVENOR STANDING AND TO SHOW CAUSE be granted and that any filer failing to adequately respond be denied Intervenor status in these proceedings, and for such other and further relief, both in law and in equity, to which it is justly entitled.

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ATTORNEYS FOR BEXAR RANCH, L.P.

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2020, the foregoing document was served on the parties and/or counsel of record identified in the applicable Service List in Docket No. 51023 in compliance with PUC Procedural Rule 22.74 and Orders issued to date.



 Soledad M. Valenciano