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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

(Your Name) FIRST SUPPLEMENT TO (his, her, their) MOTION TO INTERVENE AND RESPONSE IN OPPOSITION TO BEXAR RANCH L.P.'S MOTION FOR CLARIFICATION, etc.

Comes now Kenya and Michael Berry, Intervenors in the above styled and number proceeding respectfully submitting this their First Supplement to their 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. Intervenors incorporate by reference KENYA AND MICHAEL BERRY'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. Intervenors own property within the Anaqua Springs Ranch subdivision. Intervenors are 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. Intervenors therefore own an interest in property directly affected by the proposed routes. Intervenors thus has a justiciable interest in the taking of said property. Even so, Intervenors 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, Intervenors 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, Intervenors own property that will be directly affected by the outcome of this proceeding.

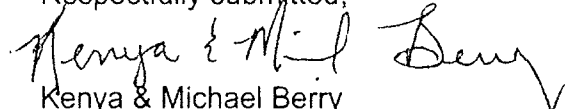
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4. Intervenor respectfully point out that all of the above information is contained, even if by inference, in the form Motion previously filed and is at least equal to the grounds given for standing by Bexar Ranch, L.P.'s own Motion to Intervene. In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

PRAYER

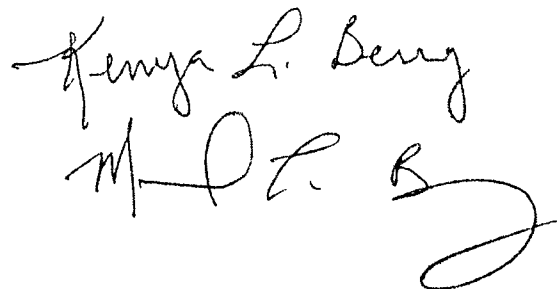
For the reasons given, Intervenor respectfully request that Bexar Ranch, L.P.'s Motion for Clarification Of Intervenor Standing And To Show Cause be denied or dismissed and/or alternatively that Intervenor Motion to Intervene as Supplemented be GRANTED.

Respectfully submitted,


Kenya & Michael Berry
24902 Caliza Terrace Boerne, TX 78006
706-341-2508
MIberry003@gmail.com

CERTIFICATE OF SERVICE

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


M. L. B.