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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 SCENIC LOOP 138-KV  
TRANSMISSION LINE IN BEXAR  
COUNTY, TEXAS**

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**BEFORE THE  
  
PUBLIC UTILITY COMMISSION  
  
OF TEXAS**

**CLEARWATER RANCH POA’S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Clearwater Ranch POA (“Clearwater Ranch”), pursuant to Public Utility Commission (“PUC”) Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

**I. AUTHORIZED REPRESENTATIVE**

Attorneys Patrick L. Reznik and Carly Barton pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Clearwater Ranch in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor’s authorized representatives is as follows:

Patrick L. Reznik  
**BRAUN & GRESHAM, PLLC**  
P.O. Box 1148  
Dripping Springs, Texas 78620  
512-894-5426 (telephone)  
512-894-3405 (fax)  
Email: [preznik@braungresham.com](mailto:preznik@braungresham.com)

Clearwater Ranch requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representatives.

## **II. JURISDICTION**

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

## **III. BASIS FOR INTERVENTION**

Clearwater Ranch has a justiciable interest in this proceeding. Clearwater Ranch owns property that may be directly impacted by one or more of the routes for the City of San Antonio, acting by and through the City Public Service Board's ("CPS Energy") proposed Scenic Loop 138-kV transmission line project in Bexar County, Texas. Clearwater Ranch has been notified by CPS Energy that their property may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52 (a)(3), by the proposed transmission line that is the subject of this docket. Clearwater Ranch, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). The Motion to Intervene is filed within 45 days of the date CPS Energy filed its Application and therefore is timely under P.U.C. PROC. R. 22.104(b). Clearwater Ranch requests that this Motion to Intervene be granted and that they be recognized as a party.

## **IV. ACKNOWLEDGEMENTS**

Clearwater Ranch acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if they file testimony, other parties may cross-examine them at the hearing; (4) if they files any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5)

they are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Clearwater Ranch respectfully requests that this Motion to Intervene be granted, that he be allowed to participate in this proceeding as a party with all rights thereof to the full extent that he desires to do so, and for such further relief to which they may be entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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/s/Patrick L. Reznik

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**ATTORNEYS FOR CLEARWATER RANCH  
POA**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on August 5, 2020 in accordance with Public Utility Commission Procedural Rule 22.74.

/s/Patrick L. Reznik

Patrick L. Reznik