



Control Number: 51023



Item Number: 194

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PUBLIC UTILITY COMMISSION  
FILING CLERK

APPLICATION OF THE CITY OF	§	
SAN ANTONIO, SACTING BY AND	§	
THROUGH CITY PUBLIC	§	PUBLIC UTILITY COMMISSION
SERVICE BOARD (CPSENERGY)	§	
TO AMEND ITS CERTIFICATE OF	§	OF TEXAS
CONVENIENCE AND NECESSITY	§	
FOR THE PROPOSED SCENIC	§	
LOOP 138-KV TRANSMISSION LINE	§	
PROJECT IN BEXAR COUNTY, TX.	§	

**MARK STEPHEN AND CATHERINE VERA CICHOWSKI'S MOTION TO INTERVENE**

Come now Mark Stephen and Catherine Vera Cichowski filing this their Motion to intervene and for good cause would show as follows:

1. The name and address of Intervenors' authorized representative is:

Steve Cichowski  
 24914 Miranda Ridge  
 Boerne, Texas 78006  
 (210) 870-1490  
[steve@cichowskilaw.com](mailto:steve@cichowskilaw.com)

All pleading and other documents should be served upon the designated authorized representative.

2. Intervenors own property that will be directly affected by the outcome of this proceeding, is a directly affected landowner, and has a justiciable interest in this proceeding. Intervenors thus have standing pursuant to § 22.103.(b)(1) and (2) of the Commission's Rules of Practice and Procedure.

3. Intervenors own real property in the Anaqua Springs Ranch subdivision

within 350 feet of one proposed route segments. The construction of this route will have a direct effect on Intervenors property and will result in a suit for damages therefrom. Intervenor thus has a justiciable interest in the taking of said property.

4. In addition, 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 and result in overall damage to the community and resultant loss in *individual* property values within the community. Thus they have standing as persons with "an interest (sic) in the application" with such standing conferred by Tex. Util. Code §37.054

5. Intervenors respectfully request the Commission grant this Motion to Intervene.

Respectfully submitted,

*/s/ Steve Cichowski*

Steve Cichowski  
24914 Miranda Ridge  
Boerne, Texas 78006  
(210) 870-1490  
[steve@cichowskilaw.com](mailto:steve@cichowskilaw.com)

CERTIFICATE OF SERVICE

I certify I served the foregoing on all parties of record by email this 2nd day of September, 2020.

\_\_\_\_\_/s/\_\_\_\_\_  
STEVE CICHOWSKI