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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 PROPOSED §
SCENIC LOOP 138-KV TRANSMISSION §
LINE §

BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS

MOTION TO INTERVENE OF ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION AND REQUEST FOR HEARING

Anaqua Springs Homeowners' Association ("Anaqua Springs HOA") submits this Motion to Intervene and Request for Hearing in the captioned proceeding pursuant to the Public Utility Regulatory Act ("PURA") and Public Utility Commission of Texas ("PUC" or "Commission") Procedural Rules 22.103 and 22.104. In support of its motion, Anaqua Springs HOA would show the following:

I. MOTION TO INTERVENE AND AUTHORIZED REPRESENTATIVES

On July 22, 2020, the City of San Antonio acting by and through the City Public Service Board ("CPS Energy") filed an application in this proceeding to amend its certificate of convenience and necessity ("CCN") in order to authorize construction of a proposed 138 kV transmission line in Bexar County, Texas. Anaqua Springs HOA owns real property that may be impacted by the proposed transmission routes. Thus, Anaqua Springs HOA is directly affected by the proposed line, has a justiciable interest in this proceeding, and has standing to intervene.

Anaqua Springs HOA's authorized representatives in this matter are:

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Should this motion be granted, Anaqua Springs HOA requests that all pleadings, orders, correspondence and other filings made in this docket be served on the authorized representatives named herein.

II. REQUEST FOR HEARING

Several other parties have filed motions to intervene and one other party has requested a hearing. Due to the number of parties that have intervened along the different segments of the routes, it appears that a hearing will be necessary. Therefore, at this time, Anaqua Springs HOA requests a hearing in this matter.

Respectfully submitted,

By: Wendy K. L. Harvel

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**ATTORNEYS FOR ANAQUA SPRINGS
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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September 2020, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Order Suspending Rules, issued in Project No. 50664.

Wendy K. L. Harvel
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