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PUC 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
PROJECT IN BEXAR COUNTY,
TEXAS** §
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**PUBLIC UTILITY COMMISSION
OF TEXAS**

TOUTANT RANCH, LTD. AND ASR PARKS, LLC’S MOTION TO INTERVENE

Toutant Ranch, Ltd. and ASR Parks, LLC (“Toutant Ranch and ASR Parks”), pursuant to the Public Utility Regulatory Act (“PURA”), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission’s Rules of Practice and Procedures, file this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of Toutant Ranch and ASR Parks’s authorized representatives are:

Ms. Katie Coleman
Mr. Michael McMillin
Thompson & Knight LLP
98 San Jacinto Blvd., Suite 1900
Austin, TX 78701
(512) 469.6100
(512) 469.6180 (fax)
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All pleadings and other documents should be served upon Toutant Ranch and ASR Parks’s authorized representatives.

2. On July 22, 2020, the City of San Antonio, acting by and through City Public Service Board (CPS Energy), filed an application requesting approval to amend its Certificate of Convenience and Necessity (CCN) to construct the Scenic Loop 138 kV Transmission Line Project in Bexar County.

3. Proposed routing segments 40, 42, 46, 48, and 49 impact property that Toutant Ranch, Ltd. owns and either has developed or is in the process of developing into residential subdivisions. Proposed routing segment 36 impacts property that ASR Parks, LLC owns and either has developed or is in the process of developing into residential subdivisions. Accordingly, Toutant Ranch and ASR Parks have a justiciable interest in the outcome of this proceeding and should be admitted as intervenors.

4. Toutant Ranch and ASR Parks respectfully request that the Commission grant this Motion to Intervene and admit Toutant Ranch and ASR Parks as intervenors in this proceeding for all purposes, and for such other relief to which they may be justly entitled.

Respectfully submitted,

THOMPSON & KNIGHT LLP

/s/ Michael McMillin

Katherine L. Coleman

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ATTORNEYS FOR
TOUTANT RANCH, LTD. AND
ASR PARKS, LLC

CERTIFICATE OF SERVICE

I, Michael McMillin, Attorney for Toutant Ranch, Ltd. and ASR Parks, LLC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 6th day of August, 2020 by hand-delivery, facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Michael McMillin

Michael McMillin