



Control Number: 51023



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AUGUST 11, 2020  
LISA CHANDLER  
CLINTON R. CHANDLER

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PUBLIC UTILITY COMMISSION  
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**PUC DOCKET NO. 51023**

APPLICATION OF THE CITY OF §  
SAN ANTONIO TO AMEND ITS § BEFORE THE  
CERTIFICATE OF §  
CONVENIENCE AND § PUBLIC UTILITY COMMISSION  
NECESSITY FOR THE SCENIC §  
LOOP 138-KV TRANSMISSION § OF TEXAS  
LINE IN BEXAR COUNTY §

**MOTION TO INTERVENE OF LISA CHANDLER AND CLINTON R. CHANDLER**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW, Lisa Chandler and Clinton R. Chandler (Chandlers or Movants) and, under P.U.C. PROC. R. §§22.103 and 22.104 and PUC Order No. 1, timely file this Motion to Intervene in the above-referenced proceeding and in support thereof respectfully show as follows:

**I. Identity of Intervenors**

Lisa Chandler  
Clinton R. Chandler  
12044 Lee Meadows  
Boerne, Texas 78006-8479

**II. Legal Representative**

The name, mailing address, telephone number, and email address of the Movants' legal representative is:

Bradford W. Bayliff  
BAYLIFF LAW FIRM PLLC  
420 Crosswind Drive  
Blanco, Texas 78606  
(512) 225-0027 Telephone  
(512) 480-9200 Facsimile  
Brad@Bayliff.Law

Movants request all pleadings, orders, correspondence, and other filings be served on their legal representative.

### III. Basis for Intervention

The Chandlers own property that may be adversely affected, as that term is defined in 16 Texas Administrative Code (TAC) §22.52(a)(3), by the proposed transmission line that is the subject of the application in this docket. Specifically, the Chandlers own property in Bexar County, Texas that would be affected if the project is constructed on Segments 40 or 46 included in the application. Movants are included on the Landowner Mailing List CPS Energy included as part of its application,<sup>1</sup> therefore, they have justiciable interests that may be adversely affected by the outcome of this docket and on that basis they seek to intervene. Movants' interests are physically and legally distinct from any other party and no other party can adequately represent their interests. The Chandlers request this Motion to Intervene be granted and that Lisa Chandler and Clinton R. Chandler be recognized as parties in this proceeding.

### IV. Acknowledgements

Movants acknowledge: (1) They will be parties to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if the Chandlers file testimony, other parties may cross-examine at a hearing any Chandler witness(es) providing testimony in this case; (4) if the Chandlers file any documents in this case, copies of those documents must be provided to every other party to this case

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<sup>1</sup> The CPS Energy application includes an ownership list with parcel numbers for affected landowners. The Chandlers' parcels are:

Lisa Chandler

ID	Segment	Structure(s)	Routes
A-141	40	5	A, E, H, Y
A-160	40	-	A, E, H, Y
A-161	40	-	A, E, H, Y
A-163	40	-	A, E, H, Y
B-028	46	-	B, C, D, I, M, T, X, Z

Clinton R. Chandler

ID	Segment	Structures(s)	Routes
A-145	40	3, 4	A, E, H, Y

under the rules of the Public Utility Commission of Texas and orders of the Administrative Law Judge; and (5) the Chandlers are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

**V. Conclusion and Prayer**

WHEREFORE, PREMISES CONSIDERED, Lisa Chandler and Clinton R. Chandler respectfully request this Motion to Intervene be granted, that they be allowed to participate as parties in this proceeding, and for such further relief to which they may be entitled.

Respectfully submitted,

**BAYLIFF LAW FIRM PLLC**

420 Crosswind Drive  
Blanco, Texas 78606  
(512) 225-0027 Telephone  
(512) 480-9200 (facsimile)

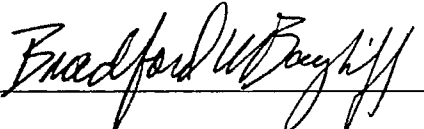
By: 

Bradford W. Bayliff  
State Bar No. 24012260  
Brad@Bayliff.Law

**ATTORNEY FOR  
LISA CHANDLER AND  
CLINTON R. CHANDLER**

**CERTIFICATE OF SERVICE**

I certify that, on August 11, 2020, a copy of the foregoing document is being submitted to the Commission's Interchange System and served via email to all parties of record for whom email addresses are readily available.

  
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Bradford W. Bayliff