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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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BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

MOTION TO INTERVENE OF CHARLENE JEAN ALVARADO LIVING TRUST

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES Rosemarie Alvarado, acting under a Power of Attorney for Charlene Jean Alvarado, Trustee of the Charlene Jean Alvarado Living Trust (“Intervenor”) pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104, and files this Motion to Intervene in the above-captioned docket. In support thereof, Intervenor respectfully shows the following:

1. On July 22, 2020, the City of San Antonio, acting by and through the City Public Service Board (“CPS ENERGY”) filed its 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. CPS ENERGY filed with its application a list of landowners that could be directly affected by one or more of the proposed segments. CPS ENERGY’s list included Intervenor as the owners of property located on Segments 4 and 5 in Bexar County, Texas.

2. Intervenor has standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenor has a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain property in Bexar County is owned by Intervenor. Intervenor has received notice from CPS ENERGY that Intervenor’s 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 proceeding. This Motion to Intervene is filed before September 7, 2020 and therefore is timely filed.

3. Attorneys Todd W. Boykin and C. Jared Knight, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor.

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Intervenor desires to be a party to the above-styled and docketed proceeding and have input in the routing process.

4. For these reasons, good cause exists to grant Intervenor's request to intervene pursuant to P.U.C. Proc. R. 22.104.

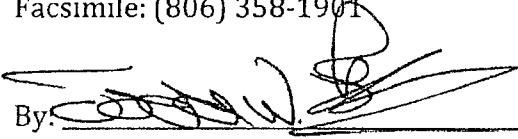
5. Intervenor requests that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon its counsel as follows:

BURDETT MORGAN WILLIAMSON & BOYKIN, LLP
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WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that this Motion to Intervene be granted and that Intervenor be allowed to participate in this proceeding as a party with all rights thereof to the full extent Intervenor desires to do so, and for such further relief to which Intervenor may be entitled.

Respectfully Submitted,

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ATTORNEYS FOR INTERVENOR

CERTIFICATE OF SERVICE

I certify that on September 4, 2020, a true and correct copy of the foregoing document will be sent for filing with the Public Utility Commission of Texas and served in accordance with PUC Order No. 1.


Todd W. Boykin