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PUC DOCKET NO. 51023

APPLICATION OF THE CITY OF SAN ANTONIO TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SCENIC LOOP 138-KV TRANS. LINE IN BEXAR COUNTY, TX

PUBLIC UTILITY COMMISSION OF TEXAS

SAVE HUNTRESS LANE AREA ASSOCIATION MOTION TO INTERVENE

Save Huntress Lane Area Association ("SHLAA" or "Movant"), hereby timely moves to intervene in the above-styled docket. The name, address, and telephone number of Movant's authorized representative is as shown below for the undersigned. Movant requests that all notices, correspondence, pleadings, briefs, and other documents be served upon the undersigned.

SHLAA is an unincorporated nonprofit association under Ch. 252 of the TEX. BUS. ORG. CODE. SHLAA is made up of over 30 individual landowners who reside in close vicinity to several of the proposed routes and/or have routes crossing their properties. Exhibit A hereto is a list of those individual landowners. In addition, the Canyons Property Owners Association is a member of SHLAA, and it represents the interests of over 700 landowners in the Canyons at Scenic Loop subdivision, whose properties are also in close vicinity to several of the proposed routes and/or have routes crossing their properties. Except for those members who intervene separately, the association is authorized to represent the interest of its members in this matter.<sup>1</sup> Exhibit B hereto is a plat showing that association.

Because certain of the proposed transmission line routes will affect properties owned by these members of Movant, Movant has a direct, justiciable interest that may be adversely affected by this proceeding's outcome. Movant's interests are physically and legally distinct from any other party, and no other party to this proceeding can adequately represent Movant's interests. Movant accordingly requests that the motion to intervene be granted.

Respectfully submitted,

By: /s/ Thomas K. Anson
Thomas K. Anson (SBN 01268200)
512-499-3608 / 512-536-5718 (fax) / TAnson@clarkhill.com
Derek Quick (SBN 24072471)
512-499-3644 / 512-536-5725 (fax) / DQuick@clarkhill.com
Clark Hill Strasburger
720 Brazos St. Suite 700, Austin, TX 78701

1 Jay and Amy Gutierrez and the Gutierrez Management Trust have already separately intervened, so they are not being represented by SHLAA. To the extent any other members of the Canyons Property Owners Association separately intervene in this matter, such members will no longer be represented by SHLAA.

**ATTORNEYS FOR SAVE HUNTRESS LANE  
AREA ASSOCIATION**

**CERTIFICATE OF SERVICE**

I certify I served the foregoing on all parties of record by email this August 11, 2020.

/s/ Thomas K. Anson  
Thomas K. Anson

**EXHIBIT A**

<u>First Name</u>	<u>Last Name</u>	<u>Address</u>
Doug & Debbie	Boazman	24209 Scenic Loop Road
Dick & Lana	Breakie	10320 Huntress Ln
Matt	Bruhn	24209 Scenic Loop #2
Lisa & Jeff	Cannon	9830 Huntress Ln
Richard & Debbie	Castillo	9660 Huntress Lane
Sally	Cody	9627 Huntress Ln.
Jerome	Cohen	9842 Huntress Lane
Tara & Jerod	Collette	10427 Doherty Spring
Tom & Earline	Darm	10339 Huntress Lane
Randy & Rachel	Davila	10330 Huntress Ln.
Griselda & Fernando	Fernandez	10039 Huntress Ln
Toya & Grant	Gallaway	10020 Huntress Lane
Leonard	Gonzalez	10125 Huntress Lane #2
Cynthia & Rob	Grimes	10326 Huntress Ln.
Jesse & Sandra	Harvey	9650 Huntress Ln.
Bill	Hill	10335 Huntress Ln
Chad & Christi	Hivnor	9927 Huntress Ln
Adrian & Jacqueline	Jimenez	9726 Huntress Ln
Dennis	Karasek	Doherty Spring
Harold & Ruth	Krimsky	9540 Huntress Ln
Nathan & Karen	Lutz	9637 Huntress Lane
Patrick & Amy	McGrath	Doherty Spring
Rachael & Paul	Macias	10107 Huntress
Raymond & Leah	Mackrell	9745 Huntress Ln
Jayne	Meals	9829 Huntress Lane
Stephen & Annie	Millett	10278 Huntress Lane
Jo & Jeanie	Nitsch-Weber	10125 Huntress Lane #1
Jerry & Jill	Nunneley	9647 Huntress Ln
Anita & Danny	Ramirez	10110 Huntress
Manuel	Rangel	9617 Huntress
Byron & Karen	Swartzendruber	10235 Huntress Ln
Stan & Joyce	Thompson	10236 Huntress Ln?
Tommy & Linda	Triesch	10343 Huntress Ln
Liz and Joe	Vied	25547 Scenic Loop

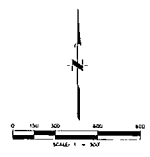


EXHIBIT B