



Control Number: 51023



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SEPTEMBER 8, 2020  
CHIP PUTNAM  
PAMELA PUTNAM



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 CHIP AND PAMELA PUTNAM**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW, Chip and Pamela Putnam (Putnams 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**

Chip Putnam  
Pamela Putnam  
27275 Carriage Row  
Boerne, Texas 78006-8460

**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 Putnams 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 Putnams own property in Bexar County, Texas that would be affected if the project is constructed on Segment 40 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 Chip and Pamela Putnam 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 Putnams file testimony, other parties may cross-examine at a hearing any Putnam witness(es) providing testimony in this case; (4) if the Putnams file any documents in this case, copies of those documents must be provided to every other party to this case 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.

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

ID	Segment	Structure(s)	Routes
A-168	40	-	A, E, H, Y
A-144	40	1, 2	A, E, H, Y

**V. Conclusion and Prayer**

WHEREFORE, PREMISES CONSIDERED, Chip and Pamela Putnam 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  
CHIP AND PAMELA PUTNAM**

**CERTIFICATE OF SERVICE**

I certify that, on September 8, 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.



Bradford W. Bayliff