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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

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PUBLIC UTILITY
COMMISSION OF TEXAS

Philip and Yajaira Paparone FIRST SUPPLEMENT TO their MOTION TO INTERVENE AND RESPONSE IN OPPOSITION TO BEXAR RANCH L.P.'S MOTION FOR CLARIFICATION, etc.

Comes now Philip and Yajaira, Intervenor in the above styled and number proceeding respectfully submitting this their First Supplement to their Motion to Intervene and Response In Opposition to Bexar Ranch L.P.'s Motion For Clarification, etc. and for cause would show as follows:

1. Intervenor incorporate by reference PATRICK CLEVELAND'S MOTION IN OPPOSITION TO BEXAR RANCH, L.P.'S "MOTION FOR CLARIFICATION OF INTERVENOR STANDING AND TO SHOW CAUSE" as if set forth fully herein.

2. Intervenor owns property within the Anaqua Springs Ranch subdivision. Intervenor, are members of the Anaqua Springs Ranch Homeowner's Association (ASRHOA). One or more of the proposed routes crosses property owned by ASRHOA and will consist of a "taking" of said property or some part thereof in the event it is constructed. Intervenor therefore owns an interest in property directly affected by the proposed routes. Intervenor thus has a justiciable interest in the taking of said property. Even so, Intervenor respectfully note that the right to intervene does not require so much as a justiciable interest, but merely an "interest in the application ...". Tex. Util. Code §37.054

3. In addition to the above, Intervenor own improved property in Anaqua Springs subdivision that is in close proximity to one of the proposed routes or route segments, and/or is directly affected by at least three of the possible alternatives due to the "blanket" effect of boxing in ASR with possible alternatives. Thus, Intervenor own property that will be directly affected by the outcome of this proceeding.

4. Intervenor respectfully points out that all of the above information is

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contained, even if by inference, in the form Motion previously filed and is at least equal to the grounds given for standing by Bexar Ranch, L.P.'s own Motion to Intervene. In addition, in its Motion for Clarification, Bexar Ranch gave no substantive reason why Intervenors lack standing *nor even why their standing should be questioned*. Overall its motivation for even filing the Motion remains unclear.

PRAYER

For the reasons given, Intervenors respectfully request that Bexar Ranch, L.P.'s Motion for Clarification Of Intervenor Standing And To Show Cause be denied or dismissed and/or alternatively that Intervenors Motion to Intervene as Supplemented be GRANTED.

Respectfully submitted,

Philip and Yajaira Paparone
125 Yaupon Trl, San Antonio TX 78256
609-457-1235
ppaparone@gmail.com

CERTIFICATE OF SERVICE

I certify I served the foregoing on all parties of record by email this 4th day of September, 2020.
