

Control Number: 51023



Item Number: 320

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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               | § |
| <b>CONVENIENCE AND NECESSITY FOR</b>   | § |
| THE PROPOSED SCENIC LOOP 138           | Š |
| <b>KV TRANSMISSION LINE PROJECT IN</b> | Š |
| BEXAR COUNTY, TEXAS                    | Š |

BEFORE THE STATE OFFICE

**OF** 

ADMINISTRATIVE HEARINGS

# BEXAR RANCH, L.P.'S REQUEST FOR A HEARING ON THE MERITS

Now comes BEXAR RANCH, L.P., an Intervenor in these proceedings, and timely files this, its REQUEST FOR A HEARING ON THE MERITS. BEXAR RANCH, L.P., respectfully shows as follows:

- 1. Intervenor, Bexar Ranch, L.P., is identified by Applicant as a directly affected landowner and owns property that would be physically crossed by the selection of several Routes and Segments provided for in the above-captioned Application.
- 2. Numerous individuals have filed motions or requests to intervene in these proceedings.
- 3. Therefore, BEXAR RANCH, L.P., contends that it is in the interest of justice for a hearing on the merits to be held so that it may conduct discovery, present evidence regarding the selection of a Route and/or Segments that best comply with PURA §37.056, and cross-examine witnesses of any parties who advocate for any Route or Segment that would cross Bexar Ranch, L.P.

#### **PRAYER**

WHEREFORE PREMISES CONSIDERED, and for the above-stated purposes, BEXAR RANCH, L.P., requests a hearing on the merits and prays for such other and further relief, both in law and in equity, to which it is justly entitled.

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### ATTORNEYS FOR BEXAR RANCH, L.P.

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 8, 2020, the foregoing document was served on the parties and/or counsel of record identified in the applicable Service List in Docket No. 51023 in compliance with PUC Procedural Rule 22.74 and Orders issued to date.

Soledad M. Valenciano