

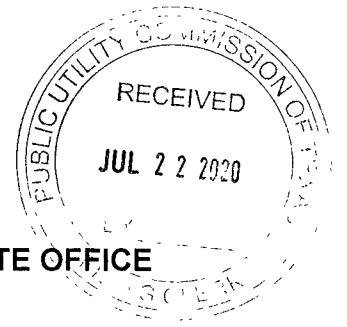


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PUC DOCKET NO. 51023

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 § **BEFORE THE STATE OFFICE**
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§ **OF**
§ **ADMINISTRATIVE HEARINGS**

BEXAR RANCH, L.P.'S MOTION TO INTERVENE

Now comes BEXAR RANCH, L.P., and pursuant to PUC Procedural Rule 22.102, 22.103(b) and 22.104, files this, its MOTION TO INTERVENE, respectfully showing as follows:

1. BEXAR RANCH, L.P.'s mailing address is:
446 CR 115
Edna, Texas 77957-4650
2. BEXAR RANCH, L.P.'s authorized representatives are:

James K. Spivey and
Soledad M. Valenciano
SPIVEY VALENCIANO, PLLC
McAllister Plaza – Suite 130
9601 McAllister Freeway
San Antonio, Texas 78216
Telephone: (210) 787-4653.
3. James K. Spivey and Soledad M. Valenciano of SPIVEY VALENCIANO, PLLC, hereby make their appearance as counsel of record for BEXAR RANCH, L.P. All documents filed in these proceedings should be served on the undersigned counsel.
4. BEXAR RANCH, L.P. owns property that may be affected by the outcome of this proceeding, is a directly affected landowner, and has a justiciable interest in this proceeding. See P.U.C. PROC. R. 22.103(b)(2); P.U.C. PROC. R. 22.52 (a)(3).


5. The Commission has jurisdiction over this case and BEXAR RANCH, L.P., pursuant to PURA § 37.053.

6. BEXAR RANCH, L.P. acknowledges that it (1) will be a party to the case; (2) will be required to respond to all discovery requests from other parties in the case; (3) may cross-examine other witnesses or be cross examined at the hearing if it files direct testimony; (4) will serve every other party in this case, except where service is modified by alternative service procedures set out by order in these proceedings, if it files any document in these proceedings; and (5) is bound by the Procedural Rules of the Texas Public Utility Commission and the State Office of Administrative Hearings.

PRAYER

WHEREFORE PREMISES CONSIDERED, and for the above-stated purposes, BEXAR RANCH, L.P., requests that this MOTION TO INTERVENE be granted and that it may go henceforth and be permitted to fully participate in these proceedings, and for such other and further relief, both in law and in equity, to which it is justly entitled.

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By: 

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ATTORNEYS FOR BEXAR RANCH, L.P.

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 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.

A handwritten signature in black ink, appearing to read 'S. Valenciano', with a long horizontal flourish extending to the right.

Soledad M. Valenciano