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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 TRANSMISSION LINE IN BEXAR COUNTY § § § § § §

BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

CPS ENERGY'S RESPONSE TO INTERCHANGE FILING #53

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this response to the August 19, 2020 motion to intervene identified as Interchange Filing #53 in this docket. Pursuant to 16 Tex. Admin. Code § 22.78(a), a response, if any, is required within five business days of such a motion. This response from CPS Energy is therefore timely filed.

The Interchange maintained by the Public Utility Commission of Texas indicates that Interchange Filing #53 was made by Hamzeh Alrafati. However, the filing itself bears no identifying information. Although it purports to be a motion to intervene, the filing contains no name, address, or other contact information for the party purporting to intervene, nor a signature for any party requesting intervention. CPS Energy did provide notice of the application to a landowner identified in property records as "Hamzeh Alrafati," (see CPS Energy's Affidavit of Notice, Exhibit A, page 3) but without additional information in the motion to intervene, CPS Energy is unable to definitively conclude that the Hamzeh Alrafati who owns property within the study area is intending to intervene in this matter.

It seems highly likely that the Hamzeh Alrafati who owns property in the study area is the person who made the filing. Further, if Mr. Alrafati desires to participate in this proceeding, CPS Energy would not likely object to his participation. However, at this time, CPS Energy must respond that further information related to Interchange Filing #53 is necessary in order to fully evaluate the merits of this purported intervention.

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Respectfully submitted,

/s/ Kirk D. Rasmussen

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ATTORNEYS FOR CPS ENERGY

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with the Commission's order in Docket No. 50664 suspending PUC Procedural Rule 22.74.

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen