

Control Number: 51023



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#### **PUC DOCKET NO. 51023**

		\\\_ BY
APPLICATION OF THE CITY OF	S	BEFORE THE
SAN ANTONIO TO AMEND ITS	S	WG CLET
CERTIFICATE OF CONVENIENCE	S	PUBLIC UTILITY COMMISSION
AND NECESSITY FOR THE SCENIC	S	
LOOP 138-KV TRANSMISSION LINE	S	OF TEXAS
IN BEXAR COUNTY	8	

### **BRAD JAUER MOTION TO INTERVENE**

NOW COMES, Brad Jauer ("Intervenor") and files this Motion to Intervene in the abovereferenced proceeding and in support thereof would respectfully show the Public Utility Commission ("PUC") the following:

## I. AUTHORIZED REPRESENTATIVE

Intervenor's authorized representative is:

Lynn Sherman State Bar No. 18243630 P.O. Box 5605 Austin, Texas 78763 (512) 431-6515 lsherman@h2otx.com

Intervenor requests that copies of pleadings and all other documents be served on Intervenor's authorized representative.

# II. BASIS FOR INTERVENTION

Intervenor co-owns, with BVJ Properties, L.L.C., Property ID C-014 and Property ID C-029, which are identified by the City of San Antonio as being directly affected by one or more proposed segments of the Scenic Loop 138-kV transmission line in the Application that is the subject of the above-referenced proceeding. Therefore, Intervenor has a justiciable interest which may be adversely affected by the outcome of the proceeding and on that basis seeks to intervene.

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### III. CONCLUSION AND PRAYER

For the foregoing reasons, Intervenor respectfully requests that the PUC grant this Motion to Intervene and that Intervenor be allowed to participate as a party to this proceeding and for such further relief to which he may be entitled.

Respectfully submitted,

Lynn Sherman

State Bar No. 18243630

P.O. Box 5605

Austin, Texas 78763

(512) 431-6515

lsherman@h2otx.com

ATTORNEY FOR BRAD JAUER

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 25<sup>th</sup> day of August, 2020, a true and correct copy of the foregoing document was electronically filed with the Clerk of the PUC and in accordance with the rules currently in effect relative to service on all parties of record via the PUC Interchange.

By: Lynn Sherman