



Control Number: 51023



Item Number: 87

Addendum StartPage: 0

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 PUBLIC UTILITY COMMISSION
OF TEXAS

BVJ PROPERTIES, L.L.C. MOTION TO INTERVENE

NOW COMES, BVJ Properties, L.L.C. (“Intervenor”) and files this Motion to Intervene in the above-referenced 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

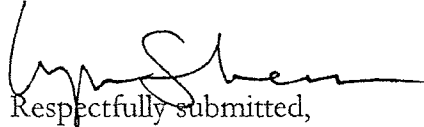
Intervenor requests that copies of pleadings and all other documents be served on Intervenor’s authorized representative.

II.
BASIS FOR INTERVENTION

Intervenor co-owns, with Brad Jauer, 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.

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

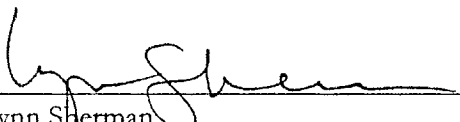
(512) 431-6515

lsherman@h2otx.com

ATTORNEY FOR BRAD JAUER

CERTIFICATE OF SERVICE

I hereby certify that on this 25th 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