

Control Number: 51023



Item Number: 95

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PUC DOCKET NO. 51023

APPLICATION OF THE CITY OF SAN ANTONIO TO AMEND ITS	§ §	PUBLIC UTILITY COMMISSION
CERTIFICATE OF CONVENIENCE	§	G'CLI
AND NECESSITY FOR THE SCENIC LOOP 138-KV TRANS. LINE IN BEXAR	§ §	OF TEXAS
COUNTY, TX	§	

OF TEXAS

SAVE HUNTRESS LANE AREA ASSOCIATION'S RESPONSE TO ORDER NO. 6 AND FIRST SUPPLEMENT TO ITS MOTION TO INTERVENE

Save Huntress Lane Area Association ("SHLAA" or "Movant") files this Response to Order No. 6 and First Supplement to its Motion to Intervene in the above-styled docket.

In response to Order No. 6, SHLAA clarifies that it is requesting intervention on its own behalf as a separate legal entity. It has also provided information regarding who are its members so that their properties can be located.

In addition, SHLAA files this supplement to state that, in addition to the landowners and the property owners' association identified as the SHLAA members in its previously filed motion to intervene, the Altair Subdivision Property Owners' Association, Inc. ("Altair") is now an additional member of SHLAA.

Altair represents the interests of 14 landowners in the Altair Subdivision, whose properties are in close vicinity to several of the proposed routes and/or have routes crossing their properties. Except for those Altair members who may intervene separately, Altair is authorized to represent the interest of its members in connection herewith. Exhibit A hereto is a map showing the location of the lots in the Altair subdivision.

Movant accordingly requests that the motion to intervene as supplemented be granted.

Respectfully submitted,

By: /s/ Thomas K. Anson Thomas K. Anson (SBN 01268200) 512-499-3608 / 512-536-5718 (fax) TAnson@clarkhill.com Derek Quick (SBN 24072471) 512-499-3644 / 512-536-5725 (fax) DQuick@clarkhill.com Clark Hill Strasburger 720 Brazos St. Suite 700, Austin, TX 78701

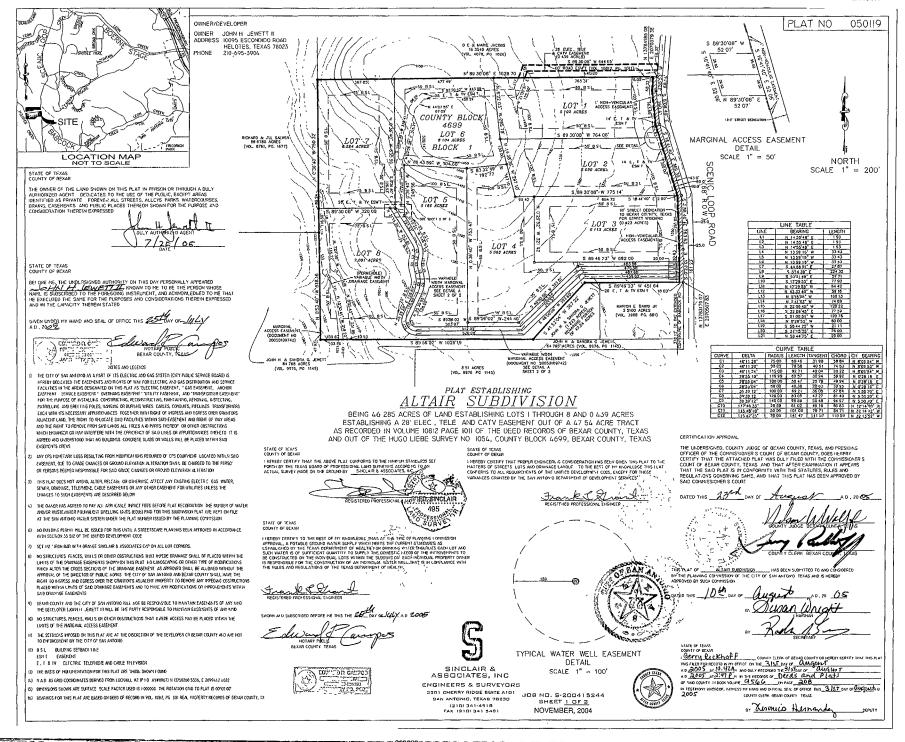
¹ Monica Esparza is a member of Altair, and she has previously intervened pro se. See https://interchange.puc.texas.gov/Documents/51023 9 1078021.PDF

ATTORNEYS FOR SAVE HUNTRESS LANE AREA ASSOCIATION

CERTIFICATE OF SERVICE

I certify I served the foregoing on all parties of record by email this 26th day of August, 2020

<u>/s/ Thomas K. Anson</u> Thomas K. Anson 28822



050119 OWNER/DEVELOPER PLAT NO. BEARING OWNER JOHN H JEWETT IF ADDRESS 10095 ESCONDIDO ROAD HELOTES, TEXAS 78023 82'06'13" 69 27 ∂**3**6'40" E 26 90' NORTH S 3175'35" E SCALE 1" = 100' 15. Q. Q. 146,93 LOT 3 LOCATION MAP NOT TO SCALE STATE OF TEXAS COUNTY OF BEXAR LOT 8 THE OWNER OF THE LAND SHOWN ON THIS PLAT IN PERSON OR THROUGH A DULY AUTHORIZED AGENT. DEDICATES TO THE USE OF THE PUBLIC, EXCPPT AREAS INDERTURES FOR THE PROPRIATE FORCE RELEASED ALLEYS, PARS WATERCOASES, DRAWS EASEPONTS, AND PUBLIC PLACES THEREON SHOWN FOR THE PLAPPOSE AND CONSIDERATION THREWER EXPRESSED. 7 OOF ACRES N 89'46'23" E 483 50' N 03/3'37" 20.00 ---LOT 4 LOT 5 20 00 ---S 89'46'23" W 451.64' 3 BEFORE ME. THE UNDERSIGNED AUTHORITY ON THIS DAY PERSONALLY APPEARED USE THE PERSON WINDS:
NAME IS SIBSCRIBED TO THE FORTGOING INSTRUMENT AND ACKNOWLEDGES TO THE THIS THE RECEIPTO THE SAME FOR THE PURPOSED AND CONSIDERATIONS THEREIN EXPRESSED AND IN THE CAPACITY THERM STATED. ∆ =87,35'43" R=70 00' JOHN H & SANGRA C JEWETT (1 223 ACRES) MARION E BAIRD JR 2 5100 ACRES (VOL. 3958 PG. 881) L=107 02 Vr-67 12 N 89'56'02" E 244 46' /N 18 05,20, M CH BEVSING⇒ CH ≈ 86 30, GIVEN UNDER MY HAND AND SEAL OF OFFICE THIS 25 VAY OF 1444 N 89'56'02" E 251 44 46'42'32' 41 28 MARGINAL ACCESS EASEMENT (OCCUMENT NO 20050109742) JOHN H & SANDRA G JEWETT 64 769 ACRES (VOL. 9878, PG 1145) S 89 56'02" W 629 31 NOTES AND LEGENDS THE CITY OF SKY MYTOND AS A PART OF HIS LLCCTAR, AND GAS SYSTEM (CITY PARLIC SERVICL BOARD) IS RESERVED DECLATED THE EXPERTIST SAN ROBING OF WAY FOR EFFCIRE AND GAS DISTRIBUTION AND SERVICE FACULTIES IN THE REPOSCISSIONATED ON THIS PLAN AS TLCCHE, RESPECTIVE, TOSA FASSE-VET, "NOWING EXPECTIVE SERVICE EXPERTION OF "SAME RESPICED, TOTAL EXPERTION" CASE FASSE-VET, "NOWING FASTERIAL SERVICE EXPERTION OF "SAME RESPICED, TOTAL TOTAL PROMISE RESPICED ON THE PROPERCY OF DISTRIBUTION OF THE PROPERCY OF DISTRIBUTION, PROFILED, REMOVALED THE PROVINCE INSPECTION PARTICIPATION, PROFILED REMOVALE INSPECTION PARTICIPATION, PROFILED REMOVALE INSPECTION PARTICIPATION OF THE PROPERCY OF THE DETAIL A EACH WITH ITS NECESSARY APPURTENANCES, TOGETHER WITH RIGHT OF INCRESS AND EGRESS OVER GRANIONS ADJACENT LAND THE RIGHT TO RELOCATE SAID FACILITIES WITHIN SAID EASEHERT AND RIGHT-OF WAY MEAS AND THE RIGHT TO REMOVE ERRY SAID LANDS ALL TIREES AND PARTS THEREOF OR OTHER COSTRUCTIONS PLAT ESTABLISHING
<u>ALTAIR</u> <u>SUBDIVISION</u> WHICH ENDANGER OR MAY INTERFERE WITH THE EFFICIENCY OF SAID LINES OR AFFURITMENCES THERETO, IT IS CERTIFICATION APPROVAL AGREED AND HINDERSTOOD THAT NO BUILDINGS, CONCRETE SLABS OR WALLS WILL BE PLACED WITHIN SAID THE UNDERSIGNED, COUNTY JUDGE OF REXAR COUNTY, TEXAS, AND PRESIDING THE UNDERSIGNED, COUNTY JUDIES OF BEAAR COUNTY, TEXAS, AND PRESIDING OFFICER OF THE COMMISSIONER'S COURT OF BEAAR COUNTY OBS FREEDY CERTIFY THAT THE ATTACHED PLAT WAS DULY FILED WITH THE COMMISSIONER'S COURT OF BEAAR COUNTY TEXAS AND THAT AFTER EXAMINATION IN APPEARS THAT THE SAID PLAT IS IN CONFORMITY WITH THE STATUTES, RLESS AND REGULATIONS CONFERNIS CAME AND THAT THE PLAT MAY BEEN APPROVED BY JULY OF MONETARY LOSS RESULTING FROM MICRIFICATIONS REQUIRED OF CPS EQUIPMENT, LOCATED WITHIN SAID BEING 46 285 ACRES OF LAND ESTABLISHING LOTS I THROUGH 8 EASEMENT DUE TO GRADE CHANGES OR GROUND ELEVATION ALTERATION SHALL BE CHARGED TO THE PERSON AND 0 439 ACRES ESTABLISHING A 28' ELEC , TELE AND CATV EASEMENT OR PERSONS DEEMED RESPONSIBLE FOR SAID GRASE CHANGES OR GROUND ELEVATION ALTERATION OUT OF A 47.54 ACRE TRACT AS RECORDED IN VOLUME 10812 PAGE 1011 THIS PLAT DOES NOT MYERD ALTER RELEASE OR OTHERWISE AFFECT ANY EXISTING LLECTRIC GAS, WATER SEWER, ORANAGE TELEPHONE, CARLE EASEMENTS OR ANY OTHER EASEMENT FOR UTILITIES UNLESS THE OF THE DEED RECORDS OF BEXAR COUNTY, TEXAS AND OUT OF THE SAID COMMISSIONER'S COURT HUGO LIEBE SURVEY NO 1054, COUNTY BLOCK 4699, BEXAR COUNTY, TEXAS CHANGES TO SUCH EASEMENTS ARE DESCRIBED BELOW THE OWNER HAS AGREED TO PAY MIT APPLICABLE TYPACT FEES DEFORE PLAT RECORDATION. THE MUSEUR OF WATER STATE OF TEXAS COUNTY OF BEXAR ALBIGR WAS TENATER FOUNDALENT DIRECTING UNITS (FOUR) PAID FOR THIS SUBDIVISION PLAT ARE REPT ON FIXE AT THE SAM ANTONIO WATER SYSTEM TIMER THE FLAT MUYSER ISSUED BY THE FLANCING CORPYSSION COUNT OR BUMB

THEREPEY CERTEY THAT THE ABOVE PLAT CONFORTS TO THE PHINNERS STANDARDS OF THOM ESTORMAL LAD STANDARDS OF THE THO NO BILLDING PERMIT WALL PERISSIND FOR THIS RINTH, A STREET JSCAPE PLAN HAS BEEN APPROVED IN ACCORDANCE WITH SECTION 35 512 OF THE UNIFIED DEVELOPMENT CODE SET 1/2 " IRON BAR WITH DRANGE SWILLAIR & ASSOCIATES CAP ON ALL LOT CORNERS Frank CD NO STRUCTURES, FENCES HALLS OR OTHER OBSTRUCTIONS THAT IMPEDE CRAMACE SHALL BE PLACED WITHIN THE LIMITS OF THE DRAWINGE FASEMENTS SHOWN ON THIS PLAT. NO LANDSCAPENG OR OTHER TYPE OF MODERCATIONS ARRICH ALTER THE CHOSS SECTIONS OF THE DRAININGE EASEMENT, AS AFFROYED SHALL BE ALLOWED WITHOUT THE APPROVAL OF THE DISPLACE PLANK WORKS. THE CITY OF SAN ANTICARD AND REXAST COUNTY SHALL HAVE THE FUARNING COMMISSION OF THE CITY OF SAN ANTONIO TEXAS AND IS HEREBY PICHT TO DICERSS AND FORESS OVER THE GRANTON'S ADJACENT PROPERTY TO REMOVE ANY INVENTAGE ORSTRUCTIONS PLACED WITHIN LIMITS OF SAID ORNINGS EASEMENTS AND TO MAKE ANY MODIFICATIONS OR IMPROVEMENTS WITHIN THERE YEAR TO THE REST OF HY MYDINA DOE. THAT AT THE THE OF PLANMAC COMPOSED APPROVA A POTROPAGE (ROQUE MATERIAL SHEATH WORLD THE LIGHTER STRANDARD AS ESTABLESTED BY THE TEXAS DEPARTMENT OF BEACH HE RESTAURCH WHITE LOCATION FOR SECRET SECRET OF SECRET WHITE TO SECRET HE SECRET SO SEPTEMBLY OF MOMENTY TO SHEATH PER OCCURTING TO THE SECRET SECRET WHITE TO SECRET HE SECRET DEXAR COUNTY AND THE CITY OF SAN ANTONIO WILL NOT BE RESPONSIBLE TO MAINTAIN EASEMENTS OF ANY KIND THE DEVELOPER (JOHN H. JEWETT II) WILL BE THE PARTY RESPONSIBLE TO MAINTAIN EASEMENTS OF MIT KIND NO STRUCTURES FENCES WALLS OR OTHER OBSTRUCTIONS THAT PYPEDE ACCESS MAY BE PLACED WITHIN THE LIMITS OF THE MARGINAL ACCESS PASSMENT THE SETEMANS IMPOSED ON THIS PLAT ARE AT THE DISCRETION OF THE DEVELOPER OR REYAR COUNTY MID ARE NOT TO EMPOREMENT BY THE CITY OF SON ANTORNO SINCLAIR & STATE OF TELLAS
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