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SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115

JOINT APPLICATION OF THE CITY	§	
OF SAN ANTONIO, ACTING BY AND	§	BEFORE THE STATE OFFICE
THROUGH THE CITY PUBLIC	§	
SERVICE BOARD (CPS ENERGY),	§	
AND SOUTH TEXAS ELECTRIC	§	
COOPERATIVE, INC. (STEC) TO	§	OF
AMEND THEIR CERTIFICATES OF	§	
CONVENIENCE AND NECESSITY	§	
FOR THE PROPOSED HOWARD	§	
ROAD-TO-SAM MIGUEL 345-KV	§	
TRANSMISSION LINE IN BEXAR AND	§	ADMINISTRATIVE HEARINGS
ATASCOSA COUNTIES	§	

MOTION TO INTERVENE OF
THE COBLE RD. GROUP

NOW COMES PATRICK SCOTT, RACHEL SCOTT, DORIS A. KOSUB, KAY KOSUB THEECK, and DAVID L. DOMSCH (being collectively known as the “Coble Rd. Group” and hereinafter the “Intervenors”), pursuant to P.U.C. Proc. R. 22.101, 22.103, 22.104, 22.105, and the applicable Order of Referral and Preliminary Order(s), to timely file this MOTION TO INTERVENE, and respectfully shows the following:

I.

Intervenors were included in the list of affected landowners in the Joint Application to Amend a Certification of Convenience and Necessity for the proposed Howard Road to San Miguel 345kV Transmission Line in Bexar and Atascosa Counties (hereinafter the “Application”), as filed by CPS Energy and STEC.

Intervenors have standing to intervene in this docket, as defined in P.U.C. Proc. R. 22.103(b)(2) because Intervenors has a justiciable interest that may be adversely affected by the outcome of this docket. Intervenors own property located in Atascosa County, Texas which would be affected by certain proposed segments of the proposed transmission line that is the subject of this docket. Intervenors have been notified by CPS Energy and STEC that their property may be directly affected by the proposed transmission line that is the subject of this docket.

II.

The name, address, and contact information for the Coble Rd. Group’s/Intervenor’s authorized representative is as follows:

Law Office of Jaime J. Trevino, Jr., PLLC
Attn: Jaime J. Trevino, Jr.

P.O. Box 163
120 Preston St.
Pleasanton, TX 78064
830-268-8440
jtrevino@jtrevlaw.com

The undersigned attorney, Jaime J. Trevino, Jr., hereby makes this notice of appearance in this matter for Intervenor. Intervenor desire to be a party to this case and have input in the routing process. Intervenor acknowledge that, if granted Intervenor status, they will (i) be a party to this case; (ii) be required to respond to all discovery requests from other parties in this case; (iii) may cross-examine other witnesses or be cross-examined at the hearing, if they file direct testimony; (iv) will serve every other party in this case when they file any document in these proceedings (except where service is modified by alternative service procedures; and (v) they are bound by the procedural rules of the Texas Public Utility Commission and the State Office of Administrative Hearings.

Intervenor requests that the Public Utility Commission of Texas (hereinafter "PUC") and all parties to this proceeding serve copies of all correspondence, pleadings, briefs, and other documents upon the authorized representatives the at address shown above.

III.

WHEREFORE, PREMISES CONSIDERED, for the above referenced reasons, Intervenor respectfully requests that this, its Motion to Intervene in the above captioned case, be granted, that Intervenor be allowed to fully participate in these proceedings to the full extent Intervenor decide to do so, and requests any other relief to which it may show itself justly entitled.

Respectfully submitted,

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/s/ JAIME J. TREVINO, JR.

Jaime J. Trevino, Jr.
Texas State Bar No. 24073770
jtrevino@jtrevlaw.com
ATTORNEY FOR INTERVENORS

CERTIFICATE OF SERVICE

I hereby certify on that on the 4th day of November, 2024, a true and correct copy of this document has been filed in the Public Utility Commission's Interchange System and served on all parties of record as required.

/s/ JAIME J. TREVINO, JR.

Jaime J. Trevino, Jr.