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DOCKET NO. 57115

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

MOTION TO INTERVENE
OF MICHAEL WITTLER, ET. AL.

COMES NOW, Michael Wittler, David Wittler, Joan White, Mary Wittler, and Anne Woods, Trustee for Woods Family Trust of Atascosa County (“Wittler Intervenors”) who file this, their Motion to Intervene in the above-referenced proceeding. Order No. 1 in this case states the deadline to intervene is November 3, 2024, and that date was amended to be November 4, 2024 by Order No. 2, thus this is timely filed. In support of their Motion, the Wittler Intervenors would respectfully state as follows:

1. The Wittler Intervenors jointly own approximately 200 acres of land in Atascosa County over which CPS Energy and South Texas Electric Cooperative have proposed to build transmission facilities in this case.

2. Each of the Wittler Intervenors meet the definition of an “affected person” within the meaning of Public Utility Regulatory Act, Tex. Util. Code Ann. § 11.003 (West 2007 & Supp. 2014) (PURA) and qualifies as an “intervenor” within the meaning of 16 TAC §§ 22.2(25) and 22.103.

2. The telephone number and address of the authorized representatives of the Wittler

Intervenors for this proceeding is:

Michael Wittler
(WITTLER INTERVENORS' DESIGNATED REPRESENTATIVE)
316 Victoria Dr.
Kerrville, TX 78028
Telephone: (830) 739-7834
Email: michaelwittlerpuc@gmail.com

3. Each of the Wittler Intervenors have a justiciable interest that may be adversely affected by the outcome of this proceeding.

WHEREFORE, PREMISES CONSIDERED, the Wittler Intervenors respectfully request that their Motion to Intervene be granted, that they be afforded full party status in this matter, and such other relief to which they may show themselves justly entitled.

Respectfully Submitted,

**Michael Wittler, David Wittler, Joan White,
Mary Wittler, and Anne Woods, Trustee for
Woods Family Trust
(Collectively "Wittler Intervenors")**
316 Victoria Dr.
Kerrville, TX 78028
830-739-7834 (Voice)



Michael Wittler
Designated Representative

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record in this docket on this the 4th day of November, 2024, via email in accordance with 16 TAC § 22.74.

A handwritten signature in black ink, appearing to read "M Wittler", written in a cursive style.

Michael Wittler