



Filing Receipt

Filing Date - 2024-11-04 02:35:08 PM

Control Number - 57115

Item Number - 112

SOAII DOCKET No. 473-25-02531
PUC DOCKET No. 57115

JOINT APPLICATION OF THE CITY	§	BEFORE THE STATE OFFICE
OF SAN ANTONIO, ACTING BY AND	§	
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-SAN MIGUEL 345-KV	§	
TRANSMISSION LINE IN BEXAR AND	§	
ATASCOSA COUNTIES	§	ADMINISTRATIVE HEARINGS

JON SPRINGER AND KELLY SPRINGER'S FIRST AMENDED MOTION TO INTERVENE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME JON SPRINGER and KELLY SPRINGER ("Intervenors") pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104, and file this *Amended Motion to Intervene* in the above-captioned docket. In support thereof respectfully show the following:

1. On October 4, 2024, The City of San Antonio, acting by and through the City Public Service Board ("CPS Energy") and South Texas Electric Cooperative, Inc. ("STEC") filed their Application to amend their Certificates of Convenience and Necessity for the Howard Road-to-San Miguel 345-KV Transmission Line in Bexar and Atascosa Counties. CPS Energy and STEC filed with their application a list of landowners that could be directly affected by one or more of the proposed segments. CPS Energy and STEC's list included Intervenors as the owners of properties in Atascosa County, Texas.

2. Intervenor has a standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenor has a justiciable interest that may be adversely affected by the outcome of this proceeding. Specifically, a potential transmission segment or segments cross Intervenor's property. As stated above, certain properties in Atascosa County are owned by Intervenor. Intervenor has received notice from CPS Energy and STTC that Intervenor's said properties may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52(a)(3), by the proposed transmission line that is the subject of this Motion to Intervene - Docket No. 57115 Page 1 of 3 proceeding. This Motion to Intervene is filed before November 4, 2024, and therefore is timely filed. Intervenor filed a Request to Intervene on October 30, 2024.¹

Intervenor files this Amended Motion out of an abundance of caution in order to enter an appearance for Intervenor's Attorney's and clarify that Intervenor's property will be crossed by one of the proposed routes.

3. Attorneys Jennifer B. Rosenblatt and Benjamin B. Doherty, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor. Intervenor desires to be parties to the above-styled and docketed proceeding and have input in the routing process.

4. For these reasons, good cause exists to grant Intervenor's request to intervene pursuant to P.U.C. Proc. R. 22.104.

5. Intervenor requests that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon their counsel of record whose contact information is contained in their signature blocks below.

WHEREFORE, PREMISED CONSIDERED, Intervenor respectfully requests that this *Motion to Intervene* be granted and that Intervenor be granted and allowed to participate in this proceeding as

¹ See Exhibit 1, Filing Receipt for Item Number 63, under Control Number 57115.

parties with all rights thereof to the full extent Intervenor desire to do so, and for such further relief to which Intervenor may be entitled.

Respectfully submitted,

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By: /s/ Benjamin B. Doherty
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ATTORNEYS FOR JON SPRINGER AND KELLY
SPRINGER

CERTIFICATE OF SERVICE

I certify that on November 4, 2024, a copy of this document is being filed in the Public Utility Commission's Interchange System and served on all parties of record as required by orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020, and July 16, 20220, in Project No. 50664.

/s/ Benjamin B. Doherty
Benjamin B. Doherty



Filing Receipt

Filing Date - 2024-10-30 03:08:25 PM

Control Number - 57115

Item Number - 63

EXHIBIT "1"

Request to Intervene in PUC Docket No. 57115

The following information must be submitted by the person requesting to intervene in this proceeding. This completed form will be provided to all parties in this docket. **If you DO NOT want to be an intervenor, but still want to file comments, please complete the "Comments" page.**

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, TX 78711-3326

First Name: Joe & Kelly

Last Name: Springer

Phone Number: 210-562-2900

Fax Number: 210-562-2929

Address, City, State: c/o Rosenblatt Law Firm, 16731 Huebner Road, San Antonio, Texas 78248

Email Address: benjamin@rosenblattlawfirm.com

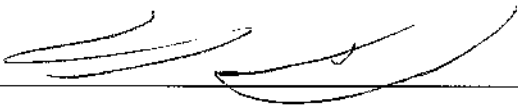
I am requesting to intervene in this proceeding. As an INTERVENOR, I understand the following:

- I am a party to the case;
- I am required to respond to all discovery requests from other parties in the case;
- If I file testimony, I may be cross-examined in the hearing;
- If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- I acknowledge that I am bound by the Procedural Rules of the Public Utility Commission of Texas (PUC) and the State Office of Administrative Hearings (SOAH).

Please check one of the following:

- ☒ I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.
- ☐ One or more of the utility's proposed routes would cross my property.
- ☐ Other. Please describe and provide comments. You may attach a separate page, if necessary.

Signature of person requesting intervention:



Date: 10.30.24

Effective: April 8, 2020