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Filing Date - 2024-11-04 02:38:53 PM

Control Number - 57115

Item Number - 113

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

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

Pat and Suzanne Schuchart; Running V Land LP; Wayne Schuchart; Atascosa Land & Cattle, Ltd.; Jeffrey and Melodie Beyer; 4000 FM140W LLC; Bill Kaiser, Jr.; and Kari Kaiser Vickers (collectively the "Southwest Landowners"), pursuant to the Public Utility Regulatory Act ("PURA"), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, file this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The name, address, and telephone number of Southwest Landowners' authorized representative is:

Michael A. McMillin
O'Melveny & Myers LLP
303 Colorado St., Suite 2750
Austin, TX 78701
(737) 261-8600
mmcmillin@omm.com
ommesevice@omm.com

All pleadings and other documents should be served upon Southwest Landowners' authorized representative.

2. 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 a joint application seeking approval to amend their certificates of convenience and necessity ("CCNs")

to construct and operate a new, double-circuit 345-kilovolt transmission line connecting the CPS Energy Howard Road station to the STEC San Miguel station.

3. Proposed routing segments impact property that is owned by each of the Southwest Landowners. The following is a list of how each member could be impacted by the proposed line:

Pat and Suzanne Schuchart

- Tract # A0475; Property ID # 11255
 - Impacted by Segment: 67
- Tract # A0048; Property ID # 18057
 - Impacted by Segment: 67

Running V Land LP (owned/controlled by Pat and Suzanne Schuchart)

- Tract # A0199; Property ID # 33142
 - Impacted by Segments: 104, 105
- Tract # A0321; Property ID # 33155
 - Impacted by Segment: 104

Wayne Schuchart

- Tract # A0512; Property ID # 197662
 - Impacted by Segment: 74

Atascosa Land & Cattle, Ltd. (owned/controlled by Wayne Schuchart¹)

- Tract # A0419; Property ID # 12163
 - Impacted by Segment: 74

4000 FM140W LLC (owned/controlled by Jeffrey and Melodie Beyer)

- Tract # A0021; Property ID # 16787
 - Impacted by Segment(s): 89, 95, 96
- Tract # A0033; Property ID # 26589
 - Impacted by Segment: 89

Bill Kaiser Jr. (as trustee)

- Tract # A1458; Property ID # 225144
 - Impacted by Segments: 104, 105, 109

Kari Kaiser Vickers (individually)

- Tract # A0556; Property ID # 32948
 - Impacted by Segment: 109

¹ Mr. Schuchart is president of SDR, Inc., which is the general partner of Atascosa Land & Cattle, Ltd.

Kari Kaiser Vickers (as trustee)

- Tract # A1459; Property ID # 225145
 - Impacted by Segments: 104, 105, 109

4. Accordingly, the Southwest Landowners have a justiciable interest in the outcome of this proceeding and should be admitted as intervenors.

For the above stated reasons, the Southwest Landowners respectfully request that the Commission grant this Motion to Intervene and admit each of the Southwest Landowners as an intervenor in this proceeding for all purposes, and for such other relief to which they may be justly entitled.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Michael A. McMillin

Michael A. McMillin
State Bar No. 24088034
303 Colorado St., Suite 2750
Austin, TX 78701
(737) 261-8600
mmcmillin@omm.com
OMMeservice@omm.com

**ATTORNEY FOR SOUTHWEST
LANDOWNERS**

CERTIFICATE OF SERVICE

I, Michael A. McMillin, Attorney for Southwest Landowners, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 4th day of November, 2024 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Michael A. McMillin

Michael A. McMillin