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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
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**

**MOTION TO INTERVENE OF ANDREW T. MOODY, JOE M. MOODY, JR.,
JOE M. MOODY, III, AND LEAH GOOD**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

NOW COME Andrew T. Moody, Joe M. Moody, Jr., Joe M. Moody, III, and Leah Good (“Intervenors”) pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104, and file this 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 Hoard 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 Intervenor 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. As stated above, certain properties in Atascosa County are owned by Intervenor. Intervenor has received notice from CPS Energy and STEC 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

proceeding. This Motion to Intervene is filed before November 4, 2024, and therefore is timely filed.

3. Attorneys Tyler Topper and Christian Stewart, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor. Intervenor desire 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 request that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon their counsel as follows:

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WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully request that this Motion to Intervene be granted and that Intervenor be granted and allowed to participate in this proceeding as 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: 

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ATTORNEYS FOR INTERVENORS

CERTIFICATE OF SERVICE

I certify 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, 2020, in Project No. 50664.

A handwritten signature in black ink, appearing to read 'Tyler Topper', is written over a horizontal line.

Tyler Topper