



Filing Receipt

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

NOW COMES Julie Gail Mitchell Marble as Trustee of The Julie Gail Mitchell Marble GST Trust;¹ Janet Corn Ivy, Individually and as Trustee of The Janet Ivy Corn GST Trust;² and Venetia Mitchell (each a “member” of the Mitchell Family Alliance)³ and, pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104 and the applicable Order of Referral and Preliminary Order, timely file this **MOTION TO INTERVENE**, respectfully showing as follows:

1. Applicant has identified the above-referenced members of the Mitchell Family Alliance as owning property that may be affected by the outcome of this

¹ See property with CPS Tract # B0261 and ID NO. 189337, as identified on Attachment 7 to the Application, of which this trust has an ownership interest. Ms. Julie Gail Mitchell Marble intervened in her individual capacity on October 8, 2024.

² See property with CPS Tract # B0261 and ID NO. 189337, as identified on Attachment 7 to the Application, of which this trust has an ownership interest.

³ See Item 15 filed in these proceedings on October 8, 2024, identifying the initial members of Mitchell Family Alliance.

proceeding, and as such are directly affected landowners and have a justiciable interest in this proceeding. See P.U.C. PROC. R. 22.103(b)(2); P.U.C. PROC. R. 22.52 (a)(3).

2. Each above-referenced member of the Mitchell Family Alliance acknowledges that if granted Intervenor status he/she/it (1) will be a party to the case; (2) will be required to respond to all discovery requests from other parties in the case; (3) may cross-examine other witnesses or be cross examined at the hearing if they file direct testimony; (4) will serve every other party in this case, except where service is modified by alternative service procedures set out by order in these proceedings, if they file any document in these proceedings; and (5) are bound by the Procedural Rules of the Texas Public Utility Commission and the State Office of Administrative Hearings.

3. Pursuant to PURA § 37.053, the Commission has jurisdiction over this case and each of the above-referenced members of the Mitchell Family Alliance.

4. The undersigned attorneys, James K. Spivey and Soledad M. Valenciano, hereby make their notice of appearance in this matter on behalf of each of above-referenced members of the Mitchell Family Alliance.

PRAYER

WHEREFORE PREMISES CONSIDERED, and for the above-stated purposes, Julie Gail Mitchell Marble as Trustee of The Julie Gail Mitchell Marble GST Trust; Janet Corn Ivy, Individually and as Trustee of The Janet Ivy Corn GST Trust; and Venetia Mitchell, respectfully request that this MOTION TO INTERVENE be granted as to each of them and that each may go henceforth and be permitted to fully participate in these

proceedings, and for such other and further relief, both in law and in equity, to which each are justly entitled.

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ATTORNEYS FOR 5M CATTLE CO., LTD.; BRET DALE MITCHELL; BRETT DALE MITCHELL AS TRUSTEE OF THE BRET D. MITCHELL GST TRUST; JACQUELINE MITCHELL; JACQUELINE MITCHELL AS THE TRUSTEE OF THE BILLY T. MITCHELL FAMILY TRUST; JACQUELINE MITCHELL AS TRUSTEE OF THE BILLY T. MITCHELL NON-EXEMPT MARITAL TRUST; JULIE GAIL MITCHELL MARBLE, JULIE GAIL MITCHELL MARBLE AS TRUSTEE OF THE JULIE GAIL MITCHELL MARBLE GST TRUST; JANET CORN IVY; JANET CORN IVY AS TRUSTEE OF THE JANET IVY CORN GST TRUST; AND VENETIA MITCHELL

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2024, a copy of this document is being filed in the Public Utility Commission's Interchange System and thereby 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.



Soledad M. Valenciano