



## **Filing Receipt**

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**Control Number - 57115**

**Item Number - 242**

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	§	ADMINISTRATIVE HEARINGS
ATASCOSA COUNTIES	§	

Now comes the MITCHELL FAMILY ALLIANCE<sup>1</sup> and files this, its Initial Brief, respectfully showing as follows:

Six “Routes of Interest” have emerged as the focus of these proceedings: Routes M, N, U, Y, N-AB and U-Alt-2.<sup>2</sup> Because the parties’ initial briefs will speak for themselves, and because it is anticipated that the initial briefs will reveal a strong preference for and support of the Routes of Interest (to the exclusion of all other alternative routes), the Mitchell Family Alliance’s Initial Brief focuses only on confirming its non-opposition to each of the Routes of Interest. It should be noted that each of the Routes of Interest use

<sup>2</sup> See Joint Applicants Exhibit 14 (Updated).

Segment 3, which crosses the Mitchell Family Alliance's property.<sup>3</sup> Nevertheless, the Mitchell Family Alliance does not oppose any of the Routes of Interest on this ground or otherwise.<sup>4</sup>

## CONCLUSION

The Mitchell Family Alliance respectfully requests that the Administrative Law Judges recommend, and the Commission order, one of the Routes of Interest, as each would more favorably comply with PURA § 37.056(c), P.U.C. SUBST. R. 25.101, applicable routing criteria, and Commission precedent, when compared to the remaining alternative routes included in the evidentiary record.

Respectfully submitted,  
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ATTORNEYS FOR 5M CATTLE CO., LTD.; BRET DALE MITCHELL (AKA "BRETT D. MITCHELL"); BRET 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

<sup>3</sup> Mitchell Family Alliance Ex. 1 at 5:14-21 and 30:18 to 31:4; Mitchell Family Alliance Ex. 2 at 3:1-21; see also Joint Applicants Ex. 14 (Updated)(showing Mitchell Family Alliance parcel crossed by Segment 3).

<sup>4</sup> Mitchell Family Alliance Ex. 1 at 5:14-21 and 30:18 to 31:4; Mitchell Family Alliance Ex. 2 at 3:1-21.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been filed in the records of Docket 57115 on this 19th day of December 2024.

A handwritten signature in black ink, appearing to read 'Soledad M. Valenciano', written over a horizontal line.

Soledad M. Valenciano