



## **Filing Receipt**

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**Control Number - 57115**

**Item Number - 27**

JOINTAPPLICATION 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 ITS CERTIFICATE OF §  
CONVENIENCE AND NECESSITY §  
FOR THE PROPOSED HOWARD §  
ROAD-T0-SAN MIGUEL 345-KV §  
TRANSMISSION LINE IN BEXAR §  
AND ATASCOSA COUNTIES §

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

## I. BASIS FOR INTERVENTION

Intervenors have standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R 22.103(b)(2), because Intervenors have a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, Intervenors have received notice from CPS

Energy and STEC that Intervenors' 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 on or before November 4, 2024, and therefore is timely filed. For these reasons, good cause exists to grant Intervenors' request to intervene pursuant to P.U.C. Proc R. 22.104.

## **II. LEGAL REPRESENTATIVES**

Attorney J Pete Laney and Trace R. Blair, pursuant to P.U.C. Proc R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenors. Intervenors desire to be parties to the above-styled and docketed proceeding and have input in the routing process. Intervenors request that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon their counsel as follows:

LAW OFFICES OF J PETE LANEY  
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## **III. ACKNOWLEDGMENTS**

Charles J. Ertel and Linda Ertel acknowledge (1) they will be parties to the case, (2) they will be required to respond to all discovery requests from other parties in this case, (3) if they file testimony, other parties may cross-examine them at the hearing, (4) if they file any documents in

this case, copies of those documents will be served to every other party in the case, except where modified by alternative service procedures set out by order in this proceeding, and (5) they are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

#### **IV. CONCLUSION AND PRAYER**

WHEREFORE, PREMISES CONSIDERED, Intervenors respectfully request that this Motion to Intervene be granted and that Intervenors be granted and allowed to participate in this proceeding as parties with all rights thereof to the full extent Intervenors desire to do so, and for such further relief to which Intervenors may be entitled.

Respectfully submitted,

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And

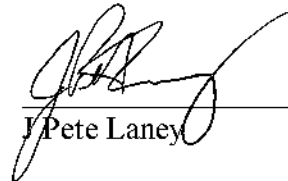
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**ATTORNEYS FOR CHARLES J.  
ERTEL AND LINDA ERTTEL**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2024, a true and correct copy of the foregoing has been served on all parties in compliance with the prior order in this case and filed in the Public Utility Commission's Interchange system.

  
Pete Laney