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

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	§	OF
COOPERATIVE, INC. (STEC) TO	§	
AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	ADMINISTRATIVE HEARINGS
FOR THE PROPOSED HOWARD	§	
ROAD-TO-SAN MIGUEL 345-KV	§	
TRANSMISSION LINE IN BEXAR	§	
AND ATASCOSA COUNTIES	§	

CHARLES J. ERTEL AND CHARLENE STAHA’S MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW Charles J. Ertel and Charlene Staha (“Intervenors”), pursuant to P.U.C. Proc R. 22.101, 22.103, and 22.104, and files this, their Motion to Intervene in the above-captioned docket. In support thereof would show the following:

I. BASIS FOR INTERVENTION

City Public Service Board (“CPS Energy”) and South Texas Electric Cooperative, Inc. (“STEC”) filed their Joint Application to Amend a Certification of Convenience and Necessity for the Proposed Howard Road to San Miguel 345kV Transmission Line in Bexar and Atascosa Counties. Intervenors were included in the list of affected landowners filed with the application. Intervenors are landowners that are directly affected by one or more of the proposed segments.

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 Intervenor's 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 Intervenor's 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 Intervenor. Intervenor desire to be a party to the above-styled and docketed proceeding and have input in the routing process. Intervenor request that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon its counsel as follows:

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III. ACKNOWLEDGMENTS

Charles J. Ertel and Charlene Staha 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, 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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And

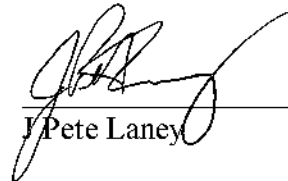
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**ATTORNEYS FOR CHARLES J.
ERTEL AND CHARLENE STAHA**

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