



## **Filing Receipt**

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**Control Number - 57115**

**Item Number - 29**

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

Intervenor has 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, Intervenor has received notice from CPS 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 desires to be a party to the above-styled and docketed proceeding and have input in the routing process. Intervenor requests that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon its counsel as follows:

### **LAW OFFICES OF J PETE LANEY**

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## **III. ACKNOWLEDGMENTS**

Perry Feeders, Inc. acknowledges (1) it will be a party to the case, (2) it will be required to respond to all discovery requests from other parties in this case, (3) if it files testimony, other parties may cross-examine its representative at the hearing, (4) if it files 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) it is 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 a party with all rights thereof to the full extent Intervenor desires to do so, and for such further relief to which Intervenor may be entitled.

Respectfully submitted,

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And

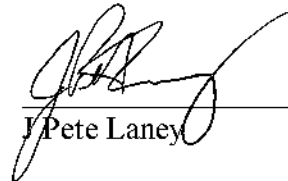
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**ATTORNEYS FOR PERRY FEEDERS,  
INC.**

**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