

# **Filing Receipt**

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

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

BEFORE THE

#### STATE OFFICE OF

ADMINISTRATIVE HEARINGS

### MOTION TO INTERVENE OF BRAZOS ELECTRIC POWER COOPERATIVE, INC.

Brazos Electric Power Cooperative, Inc. ("Brazos Electric") files this Motion to Intervene, and respectfully shows the following:

1. Brazos Electric supports the Proposed Project and owns transmission assets that may be affected by the outcome of this proceeding. In particular, Brazos Electric owns two 345 kV circuits at STEC's San Miguel Station, which will interconnect the Proposed Project. Therefore, Brazos Electric has a justiciable interest in this proceeding.

2. Brazos Electric acknowledges that if granted intervenor status 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 it files 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 it files any document in these proceedings; and (5) is bound by the Procedural Rules of the Texas Public Utility Commission and the State Office of Administrative Hearings.

3. The Commission has jurisdiction over this case and Brazos Electric pursuant to PURA § 37.053.

4. The name, address, telephone number and email addresss of Brazos Electric's authorized representatives are as shown below for the undersigned.

WHEREFORE, Brazos Electric respectfully requests that this Motion to Intervene be granted and that it be permitted to fully participate in these proceedings, and for such other relief to which it may be entitled.

Respectfully Submitted,

SMSauders

SEGREST & SEGREST, P.C. Shane M. Sanders State Bar No. 17608050 Philip R. Segrest Texas State Bar No. 17996000 28015 West Highway 84 McGregor, Texas 76657 Phone: (254) 214-5071 Office: (254) 848-2600 Fax: (254) 848-2700 shane.sanders@segrestfirm.com

ATTORNEYS FOR BRAZOS ELECTRIC POWER COOPERATIVE, INC.

## **CERTIFICATE OF SERVICE**

A copy of this document is being filed in the Public Utility Commission's Interchange system and served on all parties of record as required by the 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.

SMSanders

Shane M. Sanders