



Filing Receipt

Filing Date - 2024-10-29 11:07:28 AM

Control Number - 57115

Item Number - 57

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

JOINT APPLICATION OF THE CITY	§	
OF SAN ANTONIO, ACTING BY AND	§	BEFORE THE STATE OFFICE
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	§	

CAPITOL AGGREGATES, LTD.'S MOTION TO INTERVENE

COMES NOW CAPITOL AGGREGATES, LTD., ("Capitol Aggregates") and pursuant to P.U.C. Proc. Rule 22.103 and 22.104, file this, its Motion to Intervene in the above-captioned docket. In support of this Motion, Capitol Aggregates would show the following:

I.

The address for Capitol Aggregates is as follows:

Capitol Aggregates, Ltd.
c/o Jim Coleman
14410 Wurzbach Parkway, Suite 120
San Antonio, Texas 78216

II.

The name, address, telephone number and e-mail addresses of Capitol Aggregates' authorized representatives are as follows:

BRADY & HAMILTON, LLP

Zach Brady
M. Ames Hutton
James Alexander N. Smith
1602 13th Street
Lubbock, Texas 79401
(806) 771-1850 (Office)
(806) 771-3750 (Fax)

zach@bhlawgroup.com
ames@bhlawgroup.com
alex@bhlawgroup.com

Capitol Aggregates requests that the Public Utility Commission of Texas (“the Commission”) and all parties to this proceeding serve copies of all correspondence, pleadings, briefs, and other documents upon the authorized representatives at the Lubbock address shown above.

III.

Capitol Aggregates has standing to intervene in this docket, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Capitol Aggregates has a justiciable interest that may be adversely affected by the outcome of this docket. Capitol Aggregates owns property located in Atascosa county which would be affected by certain proposed segments. Capitol Aggregates has been notified by CPS Energy and STEC that its property may be directly affected by the proposed transmission line that is the subject of this docket.

NOW THEREFORE, for the above-mentioned reasons, Capitol Aggregates respectfully requests that this, its Motion to Intervene in the above-captioned case be granted and requests any other relief to which it may show itself entitled.

[signature page to follow]

Respectfully submitted,

BRADY & HAMILTON, LLP



Zachary S. Brady

State Bar No. 24012320

zach@bhlawgroup.com

M. Ames Hutton

State Bar No. 24012879

ames@bhlawgroup.com

James Alexander N. Smith

State Bar No. 24098442

alex@bhlawgroup.com

1602 13th Street

Lubbock, Texas 79401

Telephone: (806) 771-1850

Facsimile: (806) 771-3750

ATTORNEYS FOR INTERVENOR
CAPITOL AGGREGATES, LTD.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties of record, via facsimile, or U.S. mail, electronic mail, or e-service on this 29th day of October 2024.



Zachary S. Brady