



## **Filing Receipt**

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

<b>JOINT APPLICATION OF THE CITY</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>OF SAN ANTONIO, ACTING BY</b>	<b>§</b>	
<b>AND THROUGH THE CITY PUBLIC</b>	<b>§</b>	<b>OF</b>
<b>SERVICE BOARD (CPS ENERGY),</b>	<b>§</b>	
<b>AND SOUTH TEXAS ELECTRIC</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>COOPERATIVE, INC. (STEC) TO</b>	<b>§</b>	
<b>AMEND THEIR CERTIFICATES OF</b>	<b>§</b>	
<b>CONVENIENCE AND NECESSITY</b>	<b>§</b>	
<b>FOR THE PROPOSED HOWARD</b>	<b>§</b>	
<b>ROAD-TO-SAN MIGUEL 345-KV</b>	<b>§</b>	
<b>TRANSMISSION LINE IN BEXAR</b>	<b>§</b>	
<b>AND ATASCOSA COUNTIES</b>	<b>§</b>	

**TERRI LYNN LUENSMANN SPOUSAL GST TRUST'S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Terri Lynn Luensmann Spousal GST Trust ("Luensmann Trust"), pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

**I. AUTHORIZED REPRESENTATIVE**

Attorneys Patrick L. Reznik and Carly Barton pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of the Luensmann Trust in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor's authorized representatives are as follows:

Patrick L. Reznik  
Carly Barton  
**BRAUN & GRESHAM, PLLC**  
P.O. Box 1148  
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[cbarton@braungresham.com](mailto:cbarton@braungresham.com)

The Luensmann Trust requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representatives.

## **II. JURISDICTION**

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

## **III. BASIS FOR INTERVENTION**

The Luensmann Trust has a justiciable interest in this proceeding. The Luensmann Trust owns property that may be directly impacted by one or more of the routes for Joint Applicants the City of San Antonio, acting by and through the City Public Service Board and South Texas Electric Cooperative, Inc.'s ("CPS & STEC") proposed Howard Road-to-San Miguel 345-kV transmission line project. The Luensmann Trust has been notified by CPS & STEC that their property 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 docket. The Luensmann Trust, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). The Motion to Intervene is filed within 30 days of the date CPS & STEC filed their Joint Application and therefore is timely under P.U.C. PROC. R. 22.104(b). The Luensmann Trust requests that this Motion to Intervene be granted and that they be recognized as a party.

#### **IV. ACKNOWLEDGEMENTS**

The Luensmann Trust acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the 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 this 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.

WHEREFORE, PREMISES CONSIDERED, the Luensmann Trust respectfully requests that this Motion to Intervene be granted, that they be allowed to participate in this proceeding as a party with all rights thereof to the full extent that they desire to do so, and for such further relief to which they may be justly entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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/s/Patrick L. Reznik

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**ATTORNEYS FOR  
TERRI LYNN LUENSMANN SPOUSAL  
GST TRUST**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on October 29, 2024, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 57115.

/s/ Patrick L. Reznik  
Patrick L. Reznik