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

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

MOTION TO INTERVENE OF
TEXAS HAY FARMS, LLC

NOW COMES TEXAS HAY FARMS, LLC (hereinafter "Intervenors"), pursuant to P.U.C. Proc. R. 22.101, 22.103, 22.104, and the applicable Order of Referral and Preliminary Order(s), to timely file this MOTION TO INTERVENE, and respectfully show(s) the following:

That Intervenors were included in the list of affected landowners in the 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 (hereinafter the "Application"), as filed by the City Public Service Board and South Texas Electric Cooperative, Inc. Intervenors have standing to intervene in that they (i) are landowners directly affected by one or more of the segments set out in the Application; and (ii) have a justiciable interest which may be adversely affected by the outcome of this proceeding. See P.U.C. Proc. R. 22.103(b)(2); P.U.C. Proc. R. 22.52(a)(3).

That the undersigned attorney, Matthew K. Franklin, hereby makes his notice of appearance in this matter for Intervenors. Intervenors desire to be a party to this case, and have input in the routing process. Intervenors request that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon their counsel, as follows:

The Law Office of Matthew K. Franklin
120 Preston Street
Pleasanton, Texas 78064
Phone: 830-569-3873
Fax: 830-569-2368
Email: matthew@havelaw.net

That, if granted Intervenor status, Intervenors acknowledge (i) they will be a party to this case; (ii) they will be required to respond to all discovery requests from other parties in this case;

(iii) they may cross-examine other witnesses or may be cross-examined at the hearing, if they file direct testimony; (iv) they will serve every other party in this case if/when they file any document in these proceedings (except where service is modified by alternative service procedures set out by order in these proceedings); and (v) they are bound by the Procedural Rules of the Texas Public Utility Commission and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully request that this Motion to Intervene be granted, that Intervenor be allowed to fully participate in these proceedings to the full extent Intervenor desire to do so, and that Intervenor be granted such other and further relief as they may demonstrate they are justly entitled.

Respectfully Submitted,

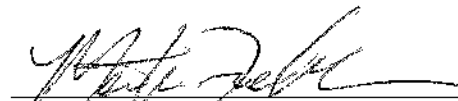


Matthew K. Franklin
State Bar No. 24090678
120 Preston Street
Pleasanton, Texas 78064
830-569-3873 – Phone
830-569-2368 – Fax
matthew@havelaw.net

Attorney for Intervenor

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2024, a true and correct copy of this document has been 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 rules of the Public Utility Commission, and the First and Second Orders Suspending Rules issued on March 16, 2020, and July 16, 2020, in Project No. 50664.


Matthew K. Franklin