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DOCKET NO. 16995

JOINT APPLICATION OF CENTRAL § PUBLIC UTILITY COMMISSION
POWER AND LIGHT COMPANY, WEST §
TEXAS UTILITIES COMPANY AND §
SOUTHWESTERN ELECTRIC POWER §
COMPANY FOR APPROVAL OF §
PRELIMINARY INTEGRATED §
RESOURCE PLANS AND FOR §
RELATED GOOD CAUSE EXCEPTIONS § OF TEXAS

OFFICE OF PUBLIC UTILITY COUNSEL'S MOTION TO INTERVENE

Under sections 1.054(a)(2) and (3) of the Public Utility Regulatory Act of 1995 ("PURA"), and sections 22.103(b)(2) and 22.104 of the Commission's Procedural Rules ("Procedural Rules"), 16 Tex. Admin. Code ch. 22, the Office of Public Utility Counsel ("OPC") respectfully moves in this proceeding to intervene as a matter of right. In support of this Motion, OPC states:

1. OPC is authorized to intervene as a matter of right in Commission proceedings to represent residential and small commercial ratepayers. PURA § 1.054(a)(2) and (3); Procedural Rule § 22.103(b)(2).

2. On January 31, 1997, Central Power and Light Company (CPL), West Texas Utilities Company (WTU), and Southwestern Electric Power Company (SWEPCO) filed a joint application for approval of preliminary integrated resource plans and for related good cause exceptions.

3. Small commercial and residential ratepayers may be affected by this proceeding and, thus, they have a justiciable interest in its outcome.

CONSEQUENTLY, OPC respectfully moves to intervene in this proceeding as a matter of right.

Dated: February 4, 1997

Respectfully submitted,

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A handwritten signature in cursive script, appearing to read "MT Drew", is written above a horizontal line.

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CERTIFICATE OF SERVICE

Docket No. 16995

I certify that today, February 4, 1997, I served a true copy of the Office of Public Utility Counsel's Motion to Intervene to the following persons by hand delivery or by U.S. Mail, first class postage prepaid.

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