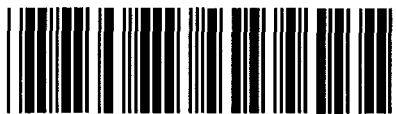




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BEFORE THE

PUBLIC UTILITY COMMISSION

FILING CLERK

PUBLIC UTILITY COMMISSION

OF TEXAS

APPLICATION OF BRAZOS  
ELECTRIC POWER COOPERATIVE,  
INC. TO CHANGE RATES FOR  
WHOLESALE TRANSMISSION  
SERVICE

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**MOTION TO INTERVENE OF TXU ENERGY RETAIL COMPANY LP**

**TO THE HONORABLE PUBLIC UTILITY COMMISSION:**

COMES NOW TXU Energy Retail Company LP ("TXU Energy") and files this Motion to Intervene pursuant to Public Utility Commission (Commission) Procedural Rules §§ 22.103 and 22.104, and in support thereof, would respectfully show as follows:

1. TXU Energy is a certificated retail electric provider ("REP") providing retail electric service in all areas of the State that are open to retail competition. As a consequence, TXU Energy pays transmission charges to transmission and distribution service providers that will be affected by the rate changes sought by Brazos Electric Power Cooperative, Inc. in this docket. For this reason, TXU Energy has a justiciable interest in this proceeding sufficient to justify its being granted intervenor status.

2. The authorized representatives of TXU Energy and their addresses for purpose of service in this proceeding are:

Stephen J. Houle  
TXU Business Services  
1601 Bryan Street, 32<sup>nd</sup> Floor  
Dallas, TX 75201  
214-812-4821 (telephone)  
214-812-3221 (facsimile)

and

Carolyn E. Shellman  
Hunton & Williams  
1601 Bryan Street, 30th Floor  
Dallas, TX 75201  
214-979-3000 (telephone)  
214-880-0011 (facsimile)

TXU Energy respectfully requests that all filings made in this docket be served on its counsel at the address listed above.

WHEREFORE, PREMISES CONSIDERED, TXU Energy respectfully requests that its Motion to Intervene be granted and that it be accorded party status in this docket.

Respectfully submitted,

**HUNTON & WILLIAMS**

By: Carolyn E. Shellman  
Carolyn E. Shellman  
State Bar No. 18196200  
1601 Bryan Street, 30<sup>th</sup> Floor  
Dallas, TX 75201  
214-979-3000 (telephone)  
214-880-0011 (facsimile)

512-349-6433 (Austin telephone)  
512-349-6485 (Austin facsimile)

**ATTORNEYS FOR TXU ENERGY  
RETAIL COMPANY LP**

**Certificate of Service**

I hereby certify that a copy of the foregoing document, Motion to Intervene of TXU Energy Retail Company LP, was filed with the Public Utility Commission and served on all parties of record in this proceeding by hand delivery, first class U.S. Mail, facsimile or by overnight delivery on this the 26th day of June, 2002.

Carolyn E. Shellman  
Carolyn E. Shellman