

Control Number: 25960



Item Number: 21

Addendum StartPage: 0

PUC DOCKET NO. 25960

FILITY COMMISSION

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APPLICATION OF BRAZOS	§	PUBLIC UTILITY CON
ELECTRIC POWER COOPERATIVE,	§	
INC. TO CHANGE RATES FOR	§	OF TEXAS
WHOLESALE TRANSMISSION	§	
SERVICE	§	

## MOTION TO INTERVENE OF CENTERPOINT ENERGY HOUSTON ELECTRIC

Reliant Energy, Incorporated d.b.a. CenterPoint Energy Houston Electric (CenterPoint Energy) files this Motion to Intervene in the petition filed by Brazos Electric Power Cooperative, Inc. (BEPC) requesting changes in its wholesale transmission service rates. In support of this Motion, CenterPoint Energy states the following:

## **Standing to Intervene**

CenterPoint Energy is a transmission and distribution utility providing service within ERCOT and is a net payor under the 2002 wholesale transmission payment matrix. The effect of granting the petition of BEPC is an increase in the wholesale transmission rates paid by CenterPoint Energy. Therefore, CenterPoint Energy is directly and substantially impacted by the issues raised and the relief requested in the petition and has a justiciable interest that may be adversely affected by the outcome of this proceeding. CenterPoint Energy, therefore, moves to intervene in this docket.

## **Authorized Representatives**

The telephone number and address of Reliant Energy's authorized legal representative are as follows:

DeAnn T. Walker, Senior Counsel CenterPoint Energy Houston Electric 1005 Congress, Suite 650 Austin, Texas 78701

Telephone: 512-397-3032 Facsimile: 512-397-3050

E-mail: deann\_t\_walker@centerpointenergy.com

The telephone number and address of CenterPoint Energy's authorized business representative are as follows:

Denise S. Hardcastle
Director, Financial Regulatory Activities
CenterPoint Energy Houston Electric
P.O. Box 4567
Houston, Texas 77210-4567

Telephone: 713-207-5767 Facsimile: 713-207-9840

E-mail: denise-hardcastle@centerpointenergy.com

CenterPoint Energy requests that all information and documents in this proceeding be served on DeAnn T. Walker, CenterPoint Energy's legal representative, at the address noted above.

In conclusion, CenterPoint Energy requests that this motion to intervene be granted and for such other relief as may be appropriate.

Respectfully submitted,

SCOTT E. ROZZELL

Executive Vice President and General Counsel

ann T. Walker

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(512) 397-3050 (fax)

ATTORNEYS FOR CENTERPOINT ENERGY

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding by hand delivery, overnight delivery, or United States first class mail on this day of day of day., 2002.

Puth Clackwelder