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SOAH DOCKET NO. 473-02-3169 DOCKET NO. 26000

APPLICATION OF WEST TEXAS UTILITIES FOR AUTHORITY TO RECONCILE FUEL COSTS BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

CITY OF ABILENE'S MOTION TO INTERVENE

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The City of Abilene files this motion to intervene and would show:

1. During the reconciliation period at issue, West Texas Utilities Company (WTU) provided electric service to the City of Abilene and residences and businesses located within Abilene's city limits. The City of Abilene has exclusive original jurisdiction over the rates, operations and services of WTU under PURA §33.001.

2. The City of Abilene has standing to participate in this proceeding pursuant to PURA §33.025.

3. The City of Abilene's authorized representative in this matter is:

Steven A. Porter Lloyd, Gosselink, Blevins, Rochelle, Baldwin & Townsend, P.C. 111 Congress Avenue, Suite 1800 Austin, Texas 78701 512-322-5800 Telephone 512-472-0532 Facsimile

WHEREFORE PREMISES CONSIDERED, the City of Abilene requests that this motion to intervene be granted.

Respectfully submitted,

LLOYD, GOSSELINK, BLEVINS, ROCHELLE, BALDWIN & TOWNSEND, P.C. P. O. Box 1725 Austin, Texas 78767 (512) 322-5800 (512) 472-0532 (Fax)

By: へへ STEVEN A. PORTER

State Bar No. 16150700

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by fax and/or regular, first class mail on this 20th day of June 2002 to the parties of record.

Steven A. Porter