



Control Number: 28813



Item Number: 434

Addendum StartPage: 0

PETITION TO INQUIRE INTO THE
REASONABLENESS OF THE RATES
AND SERVICES OF CAP ROCK ENERGY
CORPORATION

§
§
§
§

PUBLIC UTILITY COMMISSION
OF TEXAS

MOTION IN INTERVENTION OF
TEXAS COTTON GINNERS' ASSOCIATION

COMES NOW Texas Cotton Ginnners' Association (TCGA), and moves to intervene in the above-captioned docket. In support of this Motion TCGA would show the following:

I.

The name, address, telephone number and e-mail address of TCGA is as follows:

TEXAS COTTON GINNERS' ASSOCIATION

Tony D. Williams
408 West 14th Street
Austin, Texas 78701
(512) 476-8388 (Office)
(512) 476-8215 (Fax)
tony@tcga.org

2004 APR - 8 AM 9:34
PUBLIC UTILITY COMMISSION
RECEIVED

II.

The name, address, telephone number and e-mail address of TCGA's authorized representative is as follows:

Zach S. Brady
MCWHORTER, COBB & JOHNSON, L.L.P.
1722 Broadway
Lubbock, Texas 79401
(806) 762-0214 (Office)
(806) 762-8014 (Fax)
zbrady@mcjllp.com

TCGA requests that the Public Utility Commission of Texas ("the Commission") and all parties to this proceeding serve copies of all correspondence, pleadings, briefs, and other documents upon TCGA's authorized representative, Zach Brady, at the Lubbock address shown above.

III.

TCGA represents cotton gins around the state. The members of TCGA gin approximately 95 percent of all cotton ginned in Texas.

434

The 10 TCGA member gins served by Cap Rock Energy Corporation ("Cap Rock") have a justiciable interest in this rate case that may be adversely affected by the outcome of this proceeding.

The TCGA members in the service area affected in this proceeding are:

Glasscock County Co-op Gin	St. Lawrence Gin
Big Spring Gin	Farmers Co-op Gin (Knott)
Mustang Farmers Gin, Inc.	Farmers Co-op Association (Stanton)
Flower Grove Co-op Gin	Four-Way Gin (Lenorah)
Tarzan Co-op Gin, Inc.	Midland Farmers Co-op

TCGA will accept and abide by the existing procedural schedule in this matter.

NOW THEREFORE, for the above-mentioned reasons TCGA respectfully requests that the Administrative Law Judge grant this, its motion to intervene in the above-captioned case, and requests any other relief to which it may show itself entitled.

Respectfully submitted,

MCWHORTER, COBB & JOHNSON, L.L.P.

P.O. Box 2547

Lubbock, Texas 79408

Telephone: (806) 762-0214

Telecopier: (806) 762-8014

By: 

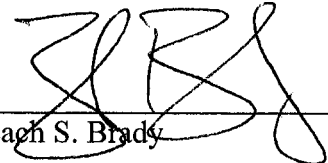
Zachary S. Brady

State Bar No. 24012320

ATTORNEYS FOR INTERVENOR
TEXAS COTTON GINNERS' ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties known of record via facsimile, U.S. mail, or electronically on this 7th day of April, 2004.


Zach S. Brady