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DOCKET NO. 28840

APPLICATION OF AEP TEXAS
CENTRAL COMPANY FOR
AUTHORITY TO CHANGE RATES

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS
CLERK

**MOTION TO INTERVENE OF
BRAZOS ELECTRIC POWER COOPERATIVE, INC.**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Brazos Electric Power Cooperative, Inc. ("**Brazos Electric**"), pursuant to Sections 22.101, 22.103 and 22.104 of the Procedural Rules of the Public Utility Commission of Texas ("**Commission**"), files this its Motion to Intervene in the above-numbered and entitled proceeding, and in support thereof, respectfully shows as follows:

1. Brazos Electric is a person within the meaning of §22.103 Proc. R. The telephone number and address of Brazos Electric and its authorized representatives are as follows:

Clifton B. Karnei
Executive Vice President and General Manager
Brazos Electric Power Cooperative, Inc.
2404 LaSalle Avenue
Waco, Texas 76702
(254) 750-6500
Fax No. (254) 750-6393

Philip R. Segrest
Bill Spears
Segrest & Segrest, P.C.
28015 West Highway 84
McGregor, Texas 76657
(254) 848-2600
Fax No. (254) 848-2700

To the extent that only one address may be used for a Commission service list, Brazos Electric requests that counsel, Bill Spears, **Segrest & Segrest, P.C.**, be served.

2. Brazos Electric is a transmission service provider and a transmission customer.

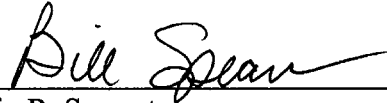
3. PUC PROC. R. §22.103 provides that a person has standing to intervene in a Commission proceeding if that person has or represents persons with a justiciable interest that may be adversely affected by the outcome of the proceeding. Brazos Electric has a justiciable interest in, and will be directly affected by the outcome of this proceeding because Brazos Electric is a

wholesale transmission service provider and customer; is a member of ERCOT; and has been a party to the prior annual proceedings which set the ERCOT-wide wholesale transmission rates.

WHEREFORE, Brazos Electric respectfully requests that its Motion to Intervene be granted, that Brazos Electric be granted party status in this proceeding, and that it be granted such other and further relief to which it may be entitled.

Respectfully submitted,

SEGREST & SEGREST, P. C.



Philip R. Segrest
State Bar No. 17996000
Bill Spears
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28015 West Highway 84
McGregor, Texas 76657
(254) 848-2600
(254) 848-2700 (FAX)
Attorneys for
**BRAZOS ELECTRIC POWER
COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was mailed by United States mail, postage prepaid, or delivered via Facsimile, Federal Express, or hand delivery, on the 12th day of November, 2003, to all parties of record.



Bill Spears