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## **DOCKET NO. 35620**

PUBLIC UTILITY COMMISSIONS
OF TEXAS APPLICATION OF CENTERPOINT **ENERGY HOUSTON ELECTRIC, LLC** § FOR APPROVAL TO IMPLEMENT ADVANCED METER INFORMATION § NETWORK PURSUANT TO PURA §39.107(i)

## ALLIANCE FOR RETAIL MARKETS' MOTION TO INTERVENE

Pursuant to P.U.C. PROC. R. 22.101(a) and P.U.C. PROC. R. 22.103(b), the Alliance for Retail Markets (ARM) files this Motion to Intervene in this proceeding. The individual member companies comprising ARM in this proceeding are Constellation NewEnergy, Inc.; Direct Energy LP; Green Mountain Energy Company; and Stream Energy. The members of ARM are competitive retail electric providers (REPs) that are certificated to provide electric service to customers in areas currently subject to retail competition in Texas, including the service territory of CenterPoint Energy Houston Electric, LLC ("CenterPoint").

In this proceeding, CenterPoint seeks Commission approval of an accelerated plan to deploy an advanced meter information network ("AMIN") in advance of the deployment plan for its Advanced Metering System ("AMS"), which is currently the subject of Docket No. 35639, Application of CenterPoint Energy Houston Electric, LLC for Approval to Implement Advanced Meter Information Network Pursuant to PURA § 39.107(i). To this end, CenterPoint requests approval of new construction services and an agreement form between CenterPoint and participating REPs. Given the impact of the relief requested on REPs offering retail service in the CenterPoint service area, ARM possesses a justiciable interest that may be adversely affected by the outcome of this proceeding. Therefore, it should be granted status as a party.

ARM's authorized legal representative in this proceeding is:

Stephen J. Davis LAW OFFICES OF STEPHEN J. DAVIS, PC 701 Brazos St. Suite 970 Austin, Texas 78701 512/479-9995 512/479-9996 (FAX)

All pleadings, orders, and other documents should be served on ARM's authorized legal representative.

For the reasons stated in this Motion to Intervene, ARM has a substantial interest may be adversely affected by the outcome of this proceeding. In recognition of this justiciable interest, ARM seeks to intervene as a party. ARM respectfully requests that the Commission grant this Motion to Intervene, allow ARM to participate in this proceeding as a party, and grant ARM any other relief to which it may be entitled.

Respectfully submitted,

Stephan

Stephen J. Davis

State Bar No. 05547750

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ATTORNEY FOR ALLIANCE FOR RETAIL MARKETS

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on May 14, 2008 by first class mail.

By: Stephen J. Davis