



Control Number: 38306



Item Number: 13

Addendum StartPage: 0

**SOAH DOCKET NO. 473-10-4451  
PUC DOCKET NO. 38306**

<b>TEXAS-NEW MEXICO POWER</b>	§	
<b>COMPANY'S REQUEST FOR</b>	§	<b>PUBLIC UTILITY COMMISSION</b>
<b>APPROVAL OF ADVANCE METERING</b>	§	
<b>SYSTEM (AMS) DEPLOYMENT AND</b>	§	<b>OF TEXAS</b>
<b>AMS SURCHARGE</b>	§	

**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 its Motion to Intervene in this proceeding. The individual member companies comprising ARM in this proceeding are Direct Energy, LP; First Choice Power; and Green Mountain Energy Company. 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 Texas-New Mexico Power Company (TNMP).

In this proceeding, TNMP seeks Commission approval of a proposed deployment plan for its Advanced Metering System ("AMS") and proposed AMS surcharges to recover the costs associated with such deployment. TNMP will assess the proposed surcharges to REPs, which will have the opportunity to use the advanced meter technology in their provision of retail electric services and products to end-use customers. Given the impact of the relief requested on REPs offering retail service in the TNMP 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.

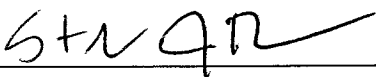
ARM's authorized legal representative in this proceeding is:

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,



Stephen J. Davis  
State Bar No. 05547750

LAW OFFICES OF STEPHEN J. DAVIS, P.C.  
701 Brazos, Suite 970  
Austin, Texas 78701  
(512) 479-9995  
(512) 479-9996 (Fax)

**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 June 15<sup>th</sup>, 2010 by first class mail.

By: 

Stephen J. Davis