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| APPLICATION OF EL PASO | § | PUBLIC UTILITY COMMISSION |
| ELECTRIC COMPANY FOR AN | § | |
| AMENDMENT TO ITS CERTIFICATE | § | OF |
| OF CONVENIENCE AND NECESSITY | § | |
| FOR A PEAKING GENERATING UNIT | § | |
| AT THE RIO GRANDE SITE IN | § | TEXAS |
| NEW MEXICO | | |

CITY OF EL PASO'S MOTION TO INTERVENE

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Comes now the City of El Paso (the "City") and files this Motion to Intervene in the above-styled and numbered docket and as grounds for said intervention would respectfully show the Commission as follows:

1. The City is a duly incorporated home rule city served by El Paso Electric Company and is a regulatory authority having original jurisdiction over electric rates and service by El Paso Electric Company. The Mayor of the City is John Cook whose office address is 2 Civic Center Plaza, El Paso, Texas 79901. The attorneys for the City are Bertha Ontiveros, Assistant City Attorney, 2 Civic Center Plaza, El Paso, Texas 79901, 915-541-4550, fax 915-541-4710, and Norman J. Gordon, Steven L. Hughes, and Erin S. McMath, Mounce, Green, Myers, Safi, Paxson & Galatzan, A Professional Corporation, 100 N. Stanton, Suite 1000, El Paso, Texas 79901, 915-532-2000, fax 915-541-1548.

2. The City files this Motion pursuant to the Commission's Procedural Rules on behalf of its citizens as an affected person and as a municipality regarding a utility serving within its corporate limits. The City is entitled to intervene pursuant to TEX. UTIL. CODE ANN. 33.025 (Vernon

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1998 & Supp. 2004) (PURA).

The City prays that this Motion to Intervene be granted and that it be given full rights of a party including the right to appear at any and all proceedings involving this docket, conduct discovery, present evidence, cross-examine witnesses and present legal arguments.

Respectfully submitted,

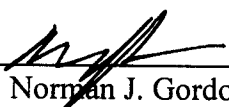
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By: _____


Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by facsimile, electronic mail, overnight delivery, or United States first-class mail on all parties of record in this proceeding on November 2, 2010.

By: 
Norman J. Gordon

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