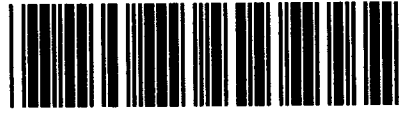




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DOCKET NO. 39068

APPLICATION OF CPS ENERGY FOR §
ADJUSTMENT OF RATES TO §
COLLECT INCREMENTAL § PUBLIC UTILITY COMMISSION
WHOLESALE TRANSMISSION COST §
REVENUE FOR THE LAST FOUR § OF TEXAS
MONTHS OF 1999 AND FOR 2000 §

GEUS' MOTION TO INTERVENE

COMES NOW GEUS, formerly known as Greenville Electric Utility System, who files this Motion to Intervene and in support thereof would show as follows:

I.

GEUS is a transmission service provider within ERCOT and is also transmission service customer.

II.

GEUS would be adversely affected by the final order issued in this proceeding, should it increase the amount of money owed to CPS Energy for the time period at issue.

III.

The name, business address and telephone number of the person designated to represent GEUS is as follows:

Alfred R. Herrera
Jim Boyle
Herrera & Boyle, PLLC
816 Congress Avenue, Suite 1250
Austin, Texas 78701
512-474-1492 (Voice)
512-474-2507 (Fax)
aherrera@herreraboylelaw.com
jboyle@herreraboylelaw.com

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PUBLIC UTILITY COMMISSION
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CLERK

IV.


GEUS requests that all filings made in this proceeding be served upon GEUS' designated representative.

WHEREFORE, GEUS respectfully asserts that it has a justiciable interest in this proceeding and prays that its Motion to Intervene be granted and that it be afforded full party status in this matter.

Respectfully submitted,

HERRERA & BOYLE, PLLC
816 Congress Avenue, Suite 1250
Austin, Texas 78701
(512) 474-1492 (voice)
(512) 474-2507 (fax)

By: _____

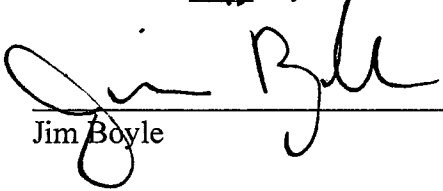

ALFRED R. HERRERA
State Bar No. 09529600

JIM BOYLE
State Bar No. 02795000

ATTORNEYS FOR GEUS

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing document upon all known parties of record by fax and/or first class mail on this the 3rd day of February, 2011.



Jim Boyle