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DOCKET NO. 40606

**APPLICATION OF WIND ENERGY §
TRANSMISSION TEXAS, LLC FOR §
AUTHORITY TO ESTABLISH INITIAL §
RATES AND TARIFFS §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**OFFICE OF PUBLIC UTILITY COUNSEL'S
MOTION TO INTERVENE**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, the Office of Public Utility Counsel, Intervenor, and files this, its Motion To Intervene in the captioned proceeding, pursuant to P.U.C. PROC. R. § 22.103(b), and in support thereof would show:

1. Intervenor is an agency of the State of Texas, expressly authorized by law to represent the interests of residential and small commercial consumer classes in proceedings before the Public Utility Commission of Texas ("Commission"). TEX. UTIL. CODE §§ 13.001 and 13.003 (Vernon 2007).
2. Moreover, the Public Counsel has determined that residential and small commercial consumers are in need of representation in this proceeding. Therefore, OPC has standing to participate in this proceeding as expressly conferred by statute.
3. The authorized representative and service information for Intervenor are:

Annette Lown Mass
Assistant Public Counsel
Office of Public Utility Counsel
1701 North Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397

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OFFICE OF PUBLIC UTILITY COUNSEL
PUBLIC UTILITY COMMISSION
OF TEXAS

THEREFORE, Intervenor respectfully requests that:

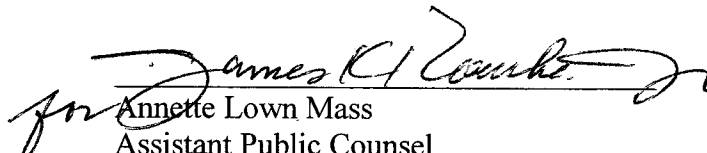
(a) The Commission or an assigned Administrative Law Judge grant this Motion to Intervene and thereby permit Intervenor to fully participate as a party in the captioned proceeding;

(b) The parties take notice of the filing of this Motion to Intervene and serve Intervenor with copies of all documents filed in this docket, including responses to requests for information; and

(c) The Commission and Administrative Law Judge grant Intervenor such other and further relief to which Intervenor may be justly entitled.

Respectfully submitted,

Sheri Sanders Givens
Public Counsel
State Bar No. 24037430


Annette Lown Mass
Assistant Public Counsel
State Bar No. 24036999

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CERTIFICATE OF SERVICE

PUC Docket No. 40606

I certify that on September 10, 2012 I served a true copy of the foregoing Office of Public Utility Counsel's Motion to Intervene on all parties of record in the captioned proceeding via United States First-Class Mail, hand-delivery or facsimile transmission.

for James R. Bourke
Annette Lown Mass