



Control Number: 41051



Item Number: 7

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PUCT DOCKET NO. 41051

INTERIM TRUE-UP §  
COMPLIANCE FILING OF §  
ENTERGY TEXAS, INC. §  
CONCERNING SCHEDULE HRC §

2013 JAN -7 PM 2:04  
BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS  
FILING CLERK

**CITIES' MOTION TO INTERVENE**

The Cities of Anahuac, Beaumont, Bridge City, Cleveland, Conroe, Dayton, Groves, Houston, Huntsville, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pine Forest, Rose City, Pinehurst, Port Arthur, Port Neches, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, and West Orange ("Cities") file this Motion to Intervene in the above styled and numbered docket. In support of the motion, Cities state the following:

1. Movants are municipalities located in the service territory of Entergy Texas, Inc. ("ETI"). Municipalities have standing in each proceeding before the Commission that relates to an electric utility providing service in the municipality, as provided by TEX. UTIL. CODE § 33.025. Entergy Texas, Inc. provides service inside the corporate boundaries of Cities.
2. In addition, Cities and their residents within the ETI boundaries of Cities have a justiciable interest that may be adversely affected by ETI's application. Thus, Cities have standing to intervene pursuant to PUC PROC. R. 22.103 and the motion is timely filed in accordance with PUC PROC. R. § 22.104.
3. Cities' authorized representative is Daniel J. Lawton, 701 Brazos, Suite 500, Austin, Texas 78701; telephone (512) 322-0019; fax (512) 716-8917. Service of all pleadings and other documents should be made upon Cities' authorized representative.

### **PRAYER**

For the above stated reasons, Cities respectfully request that Cities' Motion to Intervene in this proceeding be granted and all other relief to which they may show themselves to be justly entitled.

Respectfully submitted,  
LAWTON LAW FIRM, P.C.



Daniel J. Lawton 00791082

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701 Brazos, Suite 500

Austin, Texas 78701

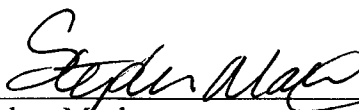
(512) 322-0019

(512) 716-8917 Fax

**ATTORNEY FOR CITIES**

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this the 7th day of January 2013, by First Class, U.S. Mail, facsimile transmission, or hand delivery.



Stephen Mack