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SOAH DOCKET NO. 473-13-4654
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APPLICATION OF AEP TEXAS	§	BEFORE THE STATE OFFICE
CENTRAL COMPANY TO ADJUST	§	
ENERGY EFFICIENCY COST	§	OF
RECOVERY FACTOR AND RELATED	§	
RELIEF	§	ADMINISTRATIVE HEARINGS

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers ("TIEC"), pursuant to the Public Utility Regulatory Act ("PURA"), Tex. Util. Code Ann. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The name, address, and telephone number of the movant is:

Texas Industrial Energy Consumers
c/o Mr. Andrew Dalton
Valero Energy Corporation
One Valero Way
San Antonio, Texas 78249
(210) 345-5954
(210) 353-8363 Fax

2. The names, address, and telephone number of TIEC's authorized representatives are:

Mr. Rex D. VanMiddlesworth
Mr. Michael Boldt
Mr. James A. Nortey
Andrews Kurth LLP
111 Congress Avenue, Suite 1700
Austin, Texas 78701
(512) 320-9200
(512) 320-9292 Fax

All pleadings and other documents should be served upon TIEC's authorized representatives.

3. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to address electricity matters in proceedings before the Commission. TIEC members for this case include Valero Energy Corporation.

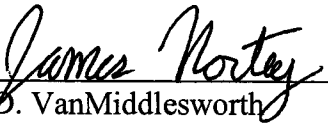
4. On May 31, 2013, AEP Texas Central Company ("TCC") filed an application with the Commission for approval to adjust its Energy Efficiency Cost Recovery Factor ("EECRF"). TCC requests approval of a 2014 Rider EECRF to recover a total of \$9,492,842 in energy efficiency costs.

5. TIEC member companies own and operate industrial facilities in TCC's service territory, and receive transmission and distribution service from TCC. Therefore, TIEC members will be financially impacted by any determinations the Commission may make regarding TCC's application. Accordingly, TIEC has a justiciable interest in this proceeding and should be granted intervenor status.

6. For the above stated reasons, TIEC respectfully requests that the Administrative Law Judge grant this Motion to Intervene in this proceeding and admit TIEC as an intervenor in this proceeding for all purposes.

Respectfully submitted,

ANDREWS KURTH LLP

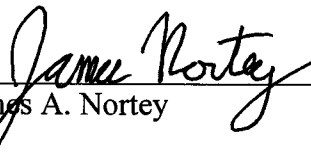


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ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, James Nortey, Attorney for TIEC, hereby certify that a copy of TIEC's Motion to Intervene was served on all parties of record in this proceeding on this 25th day of June, 2013 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.



James A. Nortey