



Control Number: 41538



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SOAH DOCKET NO. 473-13-4654
PUC DOCKET NO. 41538

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PUBLIC UTILITY COMMISSION
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APPLICATION OF AEP TEXAS §
CENTRAL COMPANY TO ADJUST §
ENERGY EFFICIENCY COST §
RECOVERY FACTOR AND RELATED §
RELIEF §
BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS

STEERING COMMITTEE OF CITIES
SERVED BY AEP TEXAS CENTRAL COMPANY'S
MOTION TO INTERVENE

COMES NOW, the Steering Committee of Cities Served by AEP Texas Central Company ("Cities")¹ and files this Motion to Intervene. In support of its Motion, Cities show as follows:

1. Cities are municipalities located within the service territory of AEP Texas Central Company ("AEP TCC"). Cities as well as their residents and businesses may be adversely impacted by the relief requested by AEP TCC regarding the energy efficiency cost recovery factor.
2. Cities have standing pursuant to Public Utility Regulatory Act ("PURA") § 33.025.²
3. Cities' authorized representatives in this matter are:

Eileen McPhee
Christopher L. Brewster
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
512-322-5800 Telephone
512-472-0532 Facsimile
emcpee@lglawfirm.com
cbrewster@lglawfirm.com

¹ For purposes of this Motion, the Steering Committee of Cities Served by AEP Texas Central Company is comprised of the following municipalities: Benevides, Devine, Lyford, Nixon, and Port Lavaca. Other cities are expected to join the coalition and will be added at a future date.

² Public Utility Regulatory Act, TEX. UTIL. CODE ANN. §§ 11.001-66.017 (West 2007 & Supp. 2012) ("PURA").

4. Docket No. 41538 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to reimbursement of rate case expenses.

WHEREFORE PREMISES CONSIDERED, Cities request that this Motion to Intervene be granted.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

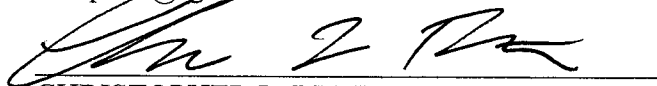
Austin, Texas 78701

(512) 322-5800

(512) 472-0532 (Fax)

cbrewster@lglawfirm.com

emcphée@lglawfirm.com



CHRISTOPHER L. BREWSTER

State Bar No. 24043570

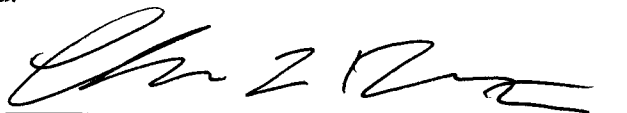
EILEEN McPHEE

State Bar No. 24060273

ATTORNEYS FOR CITIES SERVED BY AEP
TEXAS CENTRAL COMPANY

CERTIFICATE OF SERVICE

By my signature so noted above, I hereby certify that a true and correct copy of the foregoing document was transmitted by facsimile, e-mail and/or regular, first class mail on this 4th day of June, 2013, to the parties of record.



CHRISTOPHER L. BREWSTER