



Control Number: 41539



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APPLICATION OF AEP TEXAS
NORTH COMPANY TO ADJUST
ENERGY EFFICIENCY COST
RECOVERY FACTOR AND
RELATED RELIEF

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BEFORE THE
FILING CLERK

STATE OFFICE OF

ADMINISTRATIVE HEARINGS

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

COMES NOW, the Steering Committee of Cities Served by AEP Texas North 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 North Company ("AEP TNC"). Cities as well as their residents and businesses may be adversely impacted by the relief requested by AEP TNC 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:

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¹ For purposes of this Motion, the Steering Committee of Cities Served by AEP Texas North Company consists of the City of Abilene. 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. 41539 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.**

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ATTORNEYS FOR CITIES SERVED BY AEP
TEXAS NORTH 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