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SOAH DOCKET NO. 473-13-4657 PUC DOCKET NO. 41544

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APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY, LLC FOR 2014 ENERGY EFFICIENCY COST RECOVERY FACTOR

BEFORE THE STATE OFFICE OF 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 abovereferenced proceeding, respectfully showing as follows:

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

Texas Industrial Energy Consumers Gerdau Ameristeel c/o Mark Zimmerman 300 Ward Road Midlothian, TX 76065 (800) 527-7979 (972) 299-5212 (fax)

2. The name of TIEC's authorized representatives are:

Mr. Lino Mendiola Ms. Gabrielle Stokes Andrews Kurth LLP 111 Congress Avenue, Suite 1700 Austin, Texas 78701 (512) 320-9200 (512) 320-9292 (Fax)

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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 docket include Texas Instruments Incorporated.

4. On May 31, 2012, Oncor Electric Delivery Company, LLC ("Oncor") filed an application with the Commission for approval to adjust its Energy Efficiency Cost Recovery Factor ("EECRF"). Oncor requests approval of a 2014 Rider EECRF to recover a total of \$72,943,287 in energy efficiency costs.

5. TIEC member companies own and operate industrial facilities in Oncor's service territory, and receive transmission and distribution service from Oncor. Therefore, TIEC members will be financially impacted by any determinations the Commission may make regarding Oncor'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

Lino Mendiola State Bar No. 00791248 Gabrielle Stokes State Bar No. 24059137 111 Congress Avenue, Suite 1700 Austin, Texas 78701 (512) 320-9200 (512) 320-9292 FAX

ATTORNEYS FOR TEXAS INDUSTRIAL ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, Gabrielle Stokes, 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 13th day of June, 2013 by electronic mail/ facsimile or First Class, U.S. Mail, Postage Prepaid.

Gabrielle Stokes