



Control Number: 42508



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

**CITIES SERVED BY AEP TEXAS CENTRAL COMPANY'S  
SECOND SUPPLEMENTAL MOTION TO INTERVENE**

COMES NOW, Cities Served by AEP Texas Central Company ("Cities")<sup>1</sup> and files this Second Supplemental Motion to Intervene for the City of Palacios. 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.<sup>2</sup>

3. Cities' authorized representatives in this matter are:

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<sup>1</sup> For purposes of this Motion, the Cities Served by AEP Texas Central Company is comprised of the following municipalities: Devine, El Campo, Harlingen, Ingleside on the Bay, Los Fresnos, Lyford, McAllen, Mercedes, Mission, Nixon, Palacios, Palm Valley, Port Isabel, and Portland. Other cities are expected to join the coalition and will be added at a future date.

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

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4. Docket No. 42508 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to timely reimbursement of rate case expenses.

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

Respectfully submitted,

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

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ATTORNEYS FOR CITIES SERVED BY AEP  
TEXAS CENTRAL COMPANY

#### **CERTIFICATE OF SERVICE**

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 19th day of August, 2014, to the parties of record.



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CHRISTOPHER L. BREWSTER