



Control Number: 42509



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SOAH DOCKET NO. 473-14-3895
PUC DOCKET NO. 42509

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

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

COMES NOW, the 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:

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

¹ 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. § 33.025 (West 2007 & Supp. 2013) (PURA).

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4. Docket No. 42509 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 Motion to Intervene be granted.

Respectfully submitted,

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

816 Congress Avenue, Suite 1900

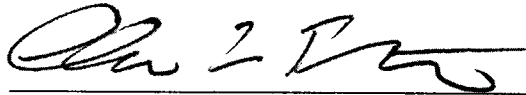
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CHRISTOPHER L. BREWSTER

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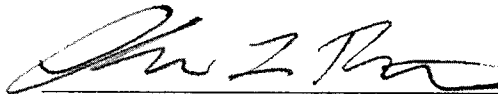
EILEEN McPHEE KEIFFER

State Bar No. 24060273

ATTORNEYS FOR CITIES SERVED BY AEP
TEXAS NORTH 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 3rd day of June, 2014, to the parties of record.



CHRISTOPHER L. BREWSTER