

Control Number: 43958



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PUCT DOCKET NO. 43958

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2014 DEC 31 AM 9:1

APPLICATION OF ENTERGY
TEXAS, INC. FOR APPROVAL OF
AN AMENDMENT TO
SERTIFICATE OF
CONVENIENCE AND NECESSITY
AND FOR PUBLIC INTEREST
DETERMINATION FOR
PURCHASE OF UNIT 1, UNION
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POWER STATION

PUBLIC UTILITY COMMISSION FILING CLERK

BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

CITIES' MOTION TO INTERVENE

The Cities of Anahuac, Beaumont, Bridge City, Cleveland, Conroe, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pine Forest, Pinehurst, Port Arthur, Port Neches, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, and West Orange ("Cities") file this Motion to Intervene in the above styled and numbered docket. In support of the motion, Cities state the following:

- 1. Movants are municipalities located in the service territory of Entergy Texas, Inc. ("ETI"). Municipalities have standing in each proceeding before the Commission that relates to an electric utility providing service in the municipality, as provided by Tex. UTIL. CODE § 33.025. Entergy Texas, Inc. provides service inside the corporate boundaries of Cities.
- 2. In addition, Cities and their residents within the ETI boundaries of Cities have a justiciable interest that may be adversely affected by ETI's application. Thus, Cities have standing to intervene pursuant to PUC PROC. R. 22.103 and the motion is timely filed in accordance with PUC PROC. R. § 22.104.
- Cities' authorized representative is Daniel J. Lawton, 12600 Hill Country Blvd., Suite R-275, Austin, Texas 78738; telephone (512) 322-0019; fax (855) 298-7978. Service of all pleadings and other documents should be made upon Cities' authorized representative.

PRAYER

For the above stated reasons, Cities respectfully request that Cities' Motion to Intervene in this proceeding be granted and all other relief to which they may show themselves to be justly entitled.

Respectfully submitted,

LAWTON LAW FIRM, P.C.

Daniel J. Lawton

00791082

Molly Mayhall Vandervoort 24048265

12600 Hill Country Blvd., Suite R275

Austin, Texas 78738

(512) 322-0019

(855) 298-7978 Fax

ATTORNEY FOR CITIES

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this the 31st day of December, 2014, by First Class, U.S. Mail, facsimile transmission, or hand delivery.

Daniel J. Lawton