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SOAH DOCKET NO. 473-15-3257
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APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, §
LLC FOR APPROVAL OF A § OF
DISTRIBUTION COST RECOVERY §
FACTOR PURSUANT TO PUC § ADMINISTRATIVE HEARINGS
SUBST. R. 25.243 §

PUBLIC UTILITY COMMISSION
FILING CLERK

MOTION TO INTERVENE OF ALLIANCE FOR RETAIL MARKETS

Pursuant to P.U.C. PROC. R. 22.103(b) and P.U.C. PROC. R. 22.104(a), the Alliance for Retail Markets (ARM) files its motion to intervene in this proceeding. The individual member companies comprising ARM in this proceeding are: Direct Energy LP; Green Mountain Energy Company; and Noble Americas Energy Solutions LLC. The members of ARM are retail electric providers (REPs) certificated to provide retail electric service to customers in areas subject to retail competition in Texas, including the service area of CenterPoint Energy Houston Electric, LLC (CenterPoint).

ARM possesses a justiciable interest in this proceeding that may be adversely affected by the outcome of this docket. In this proceeding, CenterPoint seeks approval of a distribution cost recovery factor (DCRF), a new non-bypassable transmission and distribution (T&D) charge, pursuant to P.U.C. SUBST. R. 25.243. All REPs providing service in CenterPoint's certificated service area, including ARM's members, will be assessed this new charge, if approved. The Commission granted party status to ARM on similar grounds in the electric utility's last rate case, Docket No. 38339.


ARM's authorized legal representative in this proceeding is:

Stephen J. Davis
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301 Congress Avenue
Suite 1050
Austin, Texas 78701
512/479-9995
512/479-9996 (FAX)

All pleadings, orders, and other documents should be served on ARM's authorized legal representative.

For the reasons stated in this Motion to Intervene, ARM has a substantial interest may be adversely affected by the outcome of this docket. In recognition of this justiciable interest, ARM seeks to intervene as a party. ARM respectfully requests that the Commission grant this Motion to Intervene, allow ARM to participate in this proceeding as a party, and grant ARM any other relief to which it may be entitled.

Respectfully submitted,




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**ATTORNEY FOR ALLIANCE FOR RETAIL
MARKETS**

Certificate of Service

I hereby certify that a true and correct copy of this foregoing document was served upon all parties on April 17, 2015 by first class mail.

By: 

Stephen J. Davis