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PUBLIC UTILITY COMMISSION  
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APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY TO	§	
ADJUST ITS ENERGY EFFICIENCY	§	OF
COST RECOVERY FACTOR	§	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 above-referenced proceeding, respectfully showing as follows:

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

Texas Industrial Energy Consumers  
c/o Ms. Teresa Brown  
Chevron Global Power Generation  
1500 Louisiana, Room  
Houston, TX 77002  
(832) 854-5640  
(832) 854-5673

2. The names, address, and telephone number of TIEC's authorized representatives are:

Mr. Rex D. VanMiddlesworth  
Mrs. Katie Coleman  
Thompson & Knight LLP  
98 San Jacinto Blvd., Suite 1900  
Austin, TX 78701  
(512) 469.6100  
(512) 469.6180 (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 case include Chevron Global Power Generation.

4. On May 1, 2015, Southwestern Public Service Company (SPS) filed an application requesting authority to adjust its Energy Efficiency Cost Recovery Factor Rider ("EECRF").

5. TIEC member companies own and operate industrial facilities in the SPS service territory and will be impacted by the Commission's decisions on the application at issue. Thus, TIEC has a substantial and vital interest in the outcome of this proceeding and requests that it be granted an opportunity to be heard.

6. For the above stated reasons, TIEC respectfully requests that the Commission grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

THOMPSON & KNIGHT LLP

A handwritten signature in cursive script, appearing to read "Katie Coleman", is written over a horizontal line.

Rex D. VanMiddlesworth  
State Bar No. 20449400  
Katie Coleman  
State Bar No. 24059596  
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Austin, Texas 78701  
(512) 469.6100  
(512) 469.6180 (fax)

ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS

### **CERTIFICATE OF SERVICE**

I, Katie Coleman, 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 21<sup>st</sup> day of May, 2015 by hand-delivery, facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

  
Katie Coleman