



Control Number: 45291



Item Number: 9

Addendum StartPage: 0

DOCKET NO. 45291

APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY FOR §
APPROVAL OF TRANSACTION WITH §
XCEL ENERGY SOUTHWEST §
TRANSMISSION COMPANY, LLC §
AND RELATED APPROVALS §

PUBLIC UTILITY COMMISSION
OF TEXAS

2015 NOV -4 PM 1:19
PUBLIC UTILITY COMMISSION
FILING CLERK

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 Procedural Rules, 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 Mr. Roger Persson
Chevron Global Power
1500 Louisiana
Houston, TX 77002
(832) 854-3703

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

Mr. Rex D. VanMiddlesworth
Mr. Benjamin Hallmark
Thompson & Knight LLP
98 San Jacinto Blvd., Suite 1900
Austin, TX 78701
(512) 469.6100
(512) 469.6180 (fax)
rex.vanm@tklaw.com
benjamin.hallmark@tklaw.com

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.

4. On October 29, 2015, Southwestern Public Service Company (SPS) filed an application for approval of the sale of certain of its transmission assets to an affiliated transmission company.

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. Therefore, TIEC has a substantial and vital interest in the outcome of this proceeding and requests that it be granted an opportunity to be heard.

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

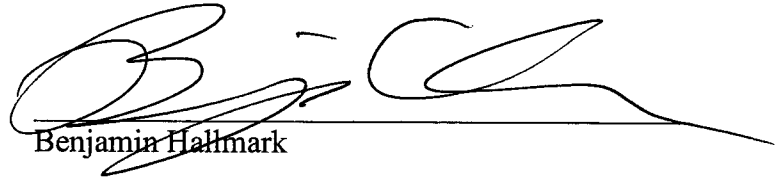


Rex D. VanMiddlesworth
State Bar No. 20449400
Benjamin Hallmark
State Bar No. 24069865
98 San Jacinto Blvd., Suite 1900
Austin, Texas 78701
(512) 469.6100
(512) 469.6180 (fax)

ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, Benjamin Hallmark, 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 4th day of November, 2015 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



Benjamin Hallmark