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**PUC DOCKET NO. 45885
SOAH DOCKET NO. 473-16-4000**

**APPLICATION OF EL PASO ELECTRIC
COMPANY TO ADJUST ITS ENERGY
EFFICIENCY COST RECOVERY
FACTOR AND REQUEST FOR
REVISED COST CAP**

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PUBLIC UTILITY COMMISSION

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**PUBLIC UTILITY COMMISSION
OF TEXAS FILING CLERK**

CITY OF EL PASO'S MOTION TO INTERVENE

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Comes now the City of El Paso (the "City") and files this Motion to Intervene in the above-styled and numbered docket and as grounds for said intervention would respectfully show the Commission as follows:

1. The City is a duly incorporated home rule city served by El Paso Electric Company and is a regulatory authority having original jurisdiction over electric rates and service by El Paso Electric Company. The Mayor of the City is Oscar Leeser whose office address is 300 N. Campbell, El Paso, Texas 79901. The attorneys for the City are Sylvia Borunda Firth, City Attorney, 300 N Campbell, El Paso, Texas 79901, 915-212-0033, fax 915-212-0034, and Norman J. Gordon and Merwan N. Bhatti, Mounce, Green, Myers, Safi, Paxson & Galatzan, A Professional Corporation, 100 N. Stanton, Suite 1000, El Paso, Texas 79901, 915-532-2000, fax 915-541-1548.

2. The City files this Motion pursuant to the Commission's Procedural Rules on behalf of its citizens as an affected person and as a municipality regarding a utility serving within its corporate limits. The City is entitled to intervene pursuant to TEX. UTIL. CODE ANN. 33.025 (Vernon 1998 & Supp. 2004) (PURA).

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The City prays that this Motion to Intervene be granted and that it be given full rights of a party including the right to appear at any and all proceedings involving this docket, conduct discovery, present evidence, cross-examine witnesses and present legal arguments.

Respectfully submitted,

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By: 
Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by facsimile on all parties of record in this proceeding on May 5, 2016.

By:  _____
Norman J. Gordon

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