



Control Number: 45915



Item Number: 10

Addendum StartPage: 0

SOAH DOCKET NO. 473-16-4020  
PUCT DOCKET NO. 45915

RECEIVED

2016 MAY 10 PM 1:55

PUBLIC UTILITY COMMISSION  
OF TEXAS  
FILED CLERK

APPLICATION OF ENTERGY § BEFORE THE STATE OFFICE  
TEXAS, INC. FOR AUTHORITY §  
TO REDETERMINE RATES FOR §  
THE ENERGY EFFICIENCY §  
COST RECOVERY FACTOR § ADMINISTRATIVE HEARINGS

**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.
3. 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. Cities request that all e-mail correspondence be directed to Daniel J. Lawton at [dlawton@ecpi.com](mailto:dlawton@ecpi.com) and Molly Mayhall Vandervoort at [molly@mayhallvandervoort.com](mailto:molly@mayhallvandervoort.com).

10

**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 10th day of May, 2016, by First Class, U.S. Mail, facsimile transmission, or hand delivery.

  
Molly Mayhall Vandervoort