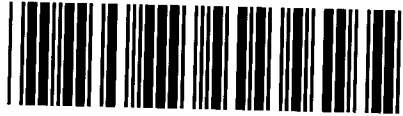




Control Number: 45929



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Addendum StartPage: 0

SOAH DOCKET NO. 473-16-4453  
PUC DOCKET NO. 45929

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APPLICATION OF AEP TEXAS § BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION  
CENTRAL COMPANY TO ADJUST § FILING CLERK  
ITS ENERGY EFFICIENCY COST § OF  
RECOVERY FACTOR AND RELATED §  
RELIEF § ADMINISTRATIVE HEARINGS

**CITIES SERVED BY AEP TEXAS CENTRAL COMPANY'S  
MOTION TO INTERVENE**

COMES NOW, the Cities Served by AEP Texas Central Company ("Cities")<sup>1</sup> and files this Motion to Intervene. In support of its Motion, Cities show as follows:

1. Cities are municipalities located within the service territory of AEP Texas Central Company ("AEP TCC"). Cities as well as their residents and businesses may be adversely impacted by the relief requested by AEP TCC regarding the energy efficiency cost recovery factor.

2. Cities have standing to participate in this proceeding pursuant to Public Utility Regulatory Act ("PURA") § 33.025.<sup>2</sup>

<sup>1</sup> Cities Served by AEP Texas Central Company consists of the City of McAllen. Other cities are expected to join the coalition and will be added at a future date.

<sup>2</sup> Public Utility Regulatory Act, TEX. UTIL. CODE ANN. § 33.025 (West 2007 & Supp. 2015) ("PURA").

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4. Cities' authorized representatives in this matter are:

Thomas L. Brocato  
Hannah M. Wilchar  
Lloyd Gosselink Rochelle & Townsend, P.C.  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
512-322-5800 Telephone  
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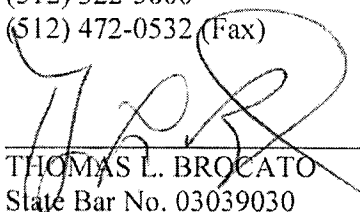
5. Docket No. 45929 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to timely reimbursement of rate case expenses.

WHEREFORE PREMISES CONSIDERED, Cities request that this Motion to Intervene be granted.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
(512) 322-5800  
(512) 472-0532 (Fax)



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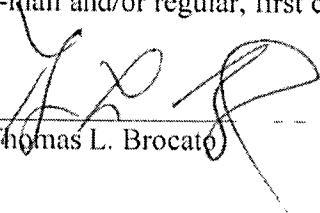
THOMAS L. BROCATO  
State Bar No. 03039030

HANNAH M. WILCHAR  
State Bar No. 24088631

ATTORNEYS FOR THE CITIES SERVED BY  
AEP TEXAS CENTRAL COMPANY

**CERTIFICATE OF SERVICE**

By my signature so noted above, I hereby certify that a true and correct copy of the foregoing document was transmitted by fax, e-mail and/or regular, first class mail on this 7th day of June, 2016, to the parties of record.

  
\_\_\_\_\_  
Thomas L. Brocato