PUC DOCKET NO. 46901

JOINT PETITION OF SOUTHWESTERN	§
PUBLIC SERVICE COMPANY AND	§
SOUTHWEST POWER POOL, INC. FOR	§
A DECLARATORY ORDER	§ .

PUBLIC UTILITY

OFFICE OF PUBLIC UTILITY COUNSEL'S MOTION TO INTERVENE

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a), and Texas Administrative Code Title 16, § 22.103(b), the Office of Public Utility Counsel (OPUC) moves to intervene in , this proceeding as a matter of right on behalf of residential and small commercial consumers. The Public Counsel has determined that residential and small commercial consumers are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute.

Dated: March 24, 2017

Respectfully submitted,

Tonya Baer Public Counsel

State Bar No. 24026771

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State Bar No. 505 11915

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I certify that today, March 24, 2017, a true copy of the Office of Public Utility Counsel's Motion to Intervene was served on all parties of record via hand delivery, facsimile, or United States First-Class Mail.

Sara J. Ferri