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APPLICATION OF EL PASO ELECTRIC §  
COMPANY FOR A TRANSMISSION §  
COST RECOVERY FACTOR §

BEFORE THE STATE OFFICE  
PUBLIC UTILITY REGULATION  
OF  
ADMINISTRATIVE HEARINGS

**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 Rules of Practice and Procedures, 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. VJ Smith  
Marathon Petroleum Corporation  
212 N. Clark St.  
El Paso, TX 79905

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

Mr. Rex D. VanMiddlesworth  
Mr. Ben Hallmark  
Mr. James Zhu  
Thompson & Knight LLP  
98 San Jacinto Blvd., Suite 1900  
Austin, TX 78701  
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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.

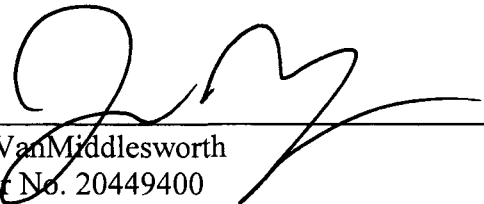
4. On January 25, 2019, El Paso Electric Company (EPE) filed an application for approval for a transmission cost recovery factor.

5. Because TIEC member companies own and operate industrial facilities in the EPE service territory and purchase electricity from EPE, TIEC members will be impacted by any determinations the Commission may make regarding EPE's application.

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




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ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS

### **CERTIFICATE OF SERVICE**

I, James Zhu, 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 4<sup>th</sup> day of February, 2019 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

James Zhu

A handwritten signature in black ink, consisting of a large loop for the 'J' and a series of fluid, connected strokes for the 'Zhu' part, written over a horizontal line.