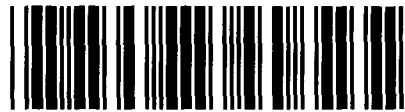




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DOCKET NO. 49308

RECEIVED

APPLICATION OF AEP TEXAS, INC.
FOR A FINANCING ORDER TO
SECURITIZE SYSTEM RESTORATION
COSTS

§
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§
§

PUBLIC UTILITY COMMISSION: 34

OF TEXAS
FILING CLERK

MOTION TO INTERVENE OF ALLIANCE FOR RETAIL MARKETS

Pursuant to 16 Texas Administrative Code ("TAC") §§ 22.103(b) and 22.104(a), the Alliance for Retail Markets ("ARM") files its motion to intervene in this proceeding. The individual member companies comprising ARM in this proceeding are NRG Retail Companies¹ and TXU Energy Retail Company LLC. The members of ARM are retail electric providers ("REPs") certificated to provide electric service to customers in areas subject to retail competition in Texas, including the service area of AEP Texas, Inc. ("AEP Texas").

ARM possesses a justiciable interest in this proceeding that may be adversely affected by the outcome of this docket. In this docket, AEP Texas seeks a financing order allowing it to securitize the distribution-related system restoration costs incurred by AEP Texas due to Hurricane Harvey and other weather-related events in AEP Texas Central Division's service territory. All REPs providing retail electric service in this service territory, including ARM's members, will be assessed the system restoration charges for which AEP seeks approval.

ARM's authorized legal representative in this proceeding is:

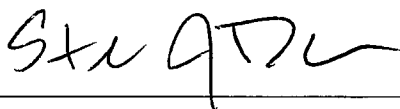
Stephen J. Davis
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davis@sjdlawoffices.com

¹ NRG Companies include NRG Texas Power LLC, NRG Power Marketing LLC, Reliant Energy Retail Services LLC, Green Mountain Energy Company, Everything Energy LLC, US Retailers LLC, and NRG Curtailment Solutions LLC.

All pleadings, orders, and other documents should be served on ARM's authorized legal representative.

For the reasons stated in this Motion to Intervene, ARM has a substantial interest may be adversely affected by the outcome of this proceeding. In recognition of this justiciable interest, ARM seeks to intervene as a party. ARM respectfully requests that the Commission grant this Motion to Intervene, allow ARM to participate in this proceeding as a party, and grant ARM any other relief to which it may be entitled.

Respectfully submitted,



Stephen J. Davis
State Bar No. 05547750

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**ATTORNEY FOR
ALLIANCE FOR RETAIL MARKETS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on April 3, 2019 by first class mail.

By: 
Stephen J. Davis