



Control Number: 49395



Item Number: 14

Addendum StartPage: 0

SOAH DOCKET NO. 743-19-3702
PUC DOCKET NO. 49395

APPLICATION OF EL PASO ELECTRIC § BEFORE THE STATE OFFICE
COMPANY FOR A DISTRIBUTION § OF FILING CLERK
COST RECOVERY FACTOR § ADMINISTRATIVE HEARINGS

VINTON STEEL, LLC'S MOTION TO INTERVENE

NOW COMES, Vinton Steel, LLC ("Vinton Steel") and files this Motion to Intervene in the above-referenced proceeding pursuant to the Public Utility Regulatory Act¹ and P.U.C. PROC. R. §§ 22.102, 22.103(b), and 22.104 and in support thereof would respectfully show as follows:

I.
IDENTITY OF INTERVENOR

The name and address of Movant is as follows:

Vinton Steel, LLC
PO Box 12843
El Paso, TX 79913-0843

II.
LEGAL REPRESENTATIVE

The names, mailing address, telephone number and email addresses of Vinton Steel's authorized representatives are as follows:

Miguel A. Huerta
Law Office of Miguel A. Huerta, PLLC
7500 Rialto Blvd., Ste. 250
Austin, Texas 78735
Telephone: (512) 502-5544
Facsimile: (512) 532-0757
Email: miguel@mhuertalaw.com

Vinton Steel requests that the Public Utility Commission of Texas (the "Commission") and all parties to this proceeding serve copies of all correspondence, pleadings, briefs, discovery, discovery responses, and other documents upon Vinton Steel's representatives at the address shown above.

¹ TEX. UTIL. CODE ANN. §§ 11.001 et seq. ("PURA").

III.
BASIS FOR INTERVENTION

On March 28, 2019, El Paso Electric Company (EPE) filed an application for approval of a distribution cost recovery factor. Vinton Steel is a user of electricity taking power from the EPE system and may be directly impacted by any determinations the Commission may make regarding EPE's application. Therefore, Vinton Steel has standing to intervene pursuant to P.U.C. PROC. R. 22.103(b) on the basis that it has a justiciable interest which may be adversely affected by the outcome of this proceeding. In recognition of its justiciable interest, Vinton Steel hereby requests leave to intervene as a party to this docket. This motion is timely filed in accordance with P.U.C. Proc. R. 22.104(b) and SOAH Order No. 2.


IV.
CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Vinton Steel respectfully requests that this Motion to Intervene be granted, that Vinton Steel be granted full party status and be allowed to participate fully in the above-referenced proceeding and that it be granted such other and further relief as to which it may show itself justly entitled.

Respectfully Submitted,

LAW OFFICE OF MIGUEL A. HUERTA, PLLC
7500 Rialto Blvd., Ste. 250
Austin, Texas 78735
(512) 494-9500 (Telephone)
(512) 494-9505 (Facsimile)
miguel@mhuertalaw.com

By:

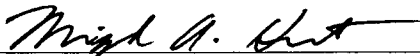


Miguel A. Huerta
State Bar No. 00787733

ATTORNEYS FOR VINTON STEEL LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April, 2019 a true and correct copy of the above and foregoing document is being served via electronic mail, facsimile, U.S. mail and/or hand delivery to all parties of record.



Miguel A. Huerta