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APPLICATION OF CENTERPOINT §
ENERGY HOUSTON ELECTRIC, §
LLC FOR AUTHORITY TO CHANGE §
RATES §
BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK 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 names, address, and telephone number of TIEC's authorized representatives are:

Ms. Katherine L. Coleman
Mr. Michael McMillin
Ms. Diane B. Tran
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All pleadings and other documents should be served upon TIEC's authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to address electricity matters in proceedings before the Commission.

3. On April 5, 2019, CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston") filed a statement of intent and application to change rates.

4. TIEC's member companies own and operate industrial facilities within CenterPoint Houston's service area, and those companies pay CenterPoint Houston's rates. In

addition, TIEC members statewide pay CenterPoint's wholesale transmission rates through the Transmission Cost Recovery Factors (TCRFs) of their respective distribution providers. Therefore, TIEC members will be impacted by any determinations the Commission may make regarding CenterPoint Houston's application. Accordingly, TIEC has a justiciable interest in this proceeding.

5. For the above stated reasons, TIEC respectfully asks that the Commission grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes, and for any other relief to which it TIEC may be entitled.

Respectfully submitted,

THOMPSON & KNIGHT LLP



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ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, Michael McMillin, 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 10th day of April, 2019 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



Michael McMillin