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PUC DOCKET NO. 49421

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APPLICATION OF CENTERPOINT §
ENERGY HOUSTON ELECTRIC, §
LLC FOR AUTHORITY TO CHANGE §
RATES §

2019 MAY 7 PM 3:57
BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS
PUBLIC UTILITIES CLERK

**TEXAS COMPETITIVE POWER ADVOCATES
MOTION TO INTERVENE**

Texas Competitive Power Advocates (TCPA), pursuant to 16 TAC § 22.103 and 22.104 of the Commission's Procedural Rules, SOAH Order No. 1 issued on April 9, 2019, and SOAH Order No. 2 issued on May 1, 2019, files this Motion to Intervene in the above-referenced proceeding.

I. Standing to Intervene

TCPA is a trade association representing power generation companies, wholesale power marketers, and retail electric providers with investments in Texas and ERCOT's wholesale electric market. TCPA members and their affiliates provide a wide range of important market functions and services in ERCOT, including the development, operation, and management of power generation assets, the scheduling and marketing of power, the provision of energy management services, and sales of competitive electric service to consumers. TCPA members provide more than 50 percent of the total net operable electric generating capacity in ERCOT, represent billions of dollars of investment in the state, and employ thousands of Texans.

On April 5, 2019, CenterPoint Energy Houston Electric LLC (CenterPoint) filed an Application for Authority to Change Rates including a request for authority to install voltage regulation batter technology to provide voltage regulation associated with solar, wind, and distributed generation expected to be connected to CenterPoint's transmission and distribution

systems in the intermediate future. CenterPoint's request could have significant impacts on the reliability of the ERCOT grid and the ERCOT electric wholesale market.

In addition to being consumers, TCPA's member companies rely upon the ERCOT grid to deliver electric power to customers and to support electric, power transactions in ERCOT's electric wholesale market. CenterPoint's battery proposal would allow a transmission-distribution utility (TDU) to include battery facilities in its rates as an ongoing solution for potential intermittent generation issues. The issue of whether battery facilities should be owned by TDUs and included in their rate base will be considered in this docket and the determination of that issue could have a potentially significant impacts on the ERCOT wholesale energy-only power market structure. In addition, the decisions made in this case may set precedent for the deployment and operation of utility-scale battery systems throughout ERCOT. Therefore, TCPA has a justiciable interest that may be adversely affected by the outcome of this proceeding and has standing to intervene in this proceeding.

II. Authorized Representative

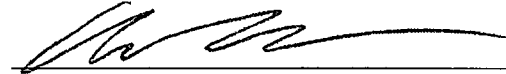
The name, address and telephone number of TCPA's authorized representative in this case is as follows:

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III. Conclusion

For the above-stated reasons, TCPA respectfully requests that its Motion to Intervene be granted and that TCPA be admitted as an intervenor in this proceeding for all purposes, and for any other relief to which it may be entitled.

Respectfully submitted,



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**ATTORNEYS FOR TEXAS
COMPETITIVE POWER ADVOCATES**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served via facsimile or first-class mail to all parties of record in this proceeding on this 7th day of May, 2019.



Andres Medrano