



Control Number: 49421



Item Number: 13

Addendum StartPage: 0

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

§ PUBLIC UTILITY REGULATION
§ BEFORE THE STATE OFFICE
§ FILING CLERK
§ OF
§ ADMINISTRATIVE HEARINGS

**MOTION TO INTERVENE OF
TEXAS COAST UTILITIES COALITION**

COMES NOW, Texas Coast Utilities Coalition¹ ("TCUC"), and files its motion to intervene, and in support thereof shows as follows:

1. TCUC is a coalition of municipalities located in the service territory of CenterPoint Energy Houston Electric, LLC ("CenterPoint"). TCUC was formed to address the municipalities' concerns with, and interest in, utility rates, services, and operations. TCUC, its residents, and businesses located within city limits may be adversely impacted by the outcome of this proceeding.
2. TCUC consists of regulatory authorities with standing to participate in this proceeding pursuant to the Public Utility Regulatory Act ("PURA"), TEX. UTIL. CODE ANN. § 33.025, and 16 Tex. Admin. Code §§ 22.102 and 25.243(e)(3). TCUC hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon the TCUC's designated representative.
3. TCUC's authorized representatives in this matter are:

Alfred R. Herrera
Brennan J. Foley
Sergio E. Herrera
HERRERA LAW & ASSOCIATES, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701
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¹ TCUC includes the Cities of Baytown, Clute, Freeport, League City, Pasadena, Pearland, Shoreacres, West Columbia, and Wharton. TCUC will designate additional member Cities in future filings as necessary.

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4. The Commission has jurisdiction over the parties and subject matter of this intervention pursuant to Chapters 33 and 36 of the Public Utility Regulatory Act ("PURA" or the "Act") as well as other provisions of the Act.

WHEREFORE, TCUC respectfully requests the entry of the Commission's order granting TCUC leave to intervene as a party.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

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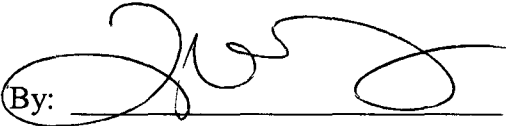
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**ATTORNEYS FOR TEXAS COAST
UTILITIES COALITION**

CERTIFICATE OF SERVICE

I hereby certify that on this the 11th day of April 2019, a true and correct copy of the ***Motion to Intervene of Texas Coast Utilities Coalition*** was served upon all parties of record by facsimile and/or First-Class United States mail, postage paid.

By: 
Leslie Lindsey