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SOAH DOCKET NO. 473-19-3864
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APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC §
FOR AUTHORITY TO CHANGE § OF
RATES § ADMINISTRATIVE HEARINGS

OLIN CORPORATION'S MOTION TO INTERVENE

Pursuant to 16 Tex. Admin. Code §§ 22.102, 22.103, and 22.140, Olin Corporation ("Olin") files this Motion to Intervene in the above-referenced, respectfully showing as follows:

I. Authorized Representatives

Olin's authorized representatives for this case are:

Meghan Griffiths
Alisha Mehta
Jackson Walker LLP
100 Congress Avenue, Suite 1100
Austin, TX 78701
(512) 236-2363
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All pleadings, notices, and other documents should be served upon Olin's authorized representatives.

II. Standing to Intervene

On April 5, 2019, CenterPoint Energy Houston Electric, LLC ("CenterPoint") filed an application requesting authority to change rates. The Administrative Law Judge in Order No. 2 established May 20, 2019 as the intervention deadline, and therefore, this motion is timely.

Olin owns and operates chlor alkali manufacturing facilities at the Freeport Industrial Park in Freeport, Texas. Olin is directly impacted by this proceeding as a ratepayer. Olin pays CenterPoint's rates and ERCOT's Transmission Cost of Service ("TCOS") through Transmission

Cost Recovery Factors (“TCRFs”) charged by Transmission and Distribution Service Providers (“TDSPs”). Olin is a ratepayer of CenterPoint, and will be directly impacted by any rate determination the Commission makes in this proceeding. Therefore, Olin has a justiciable interest that may be adversely affected by the outcome of this proceeding.

IV. Conclusion and Prayer

Olin respectfully requests that the Commission grant this Motion to Intervene, admitting Olin as an Intervenor in this proceeding for all purposes. Additionally, Olin requests such other relief to which it may be entitled.

Respectfully submitted,

JACKSON WALKER LLP

/s/ Meghan Griffiths

Meghan Griffiths

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ATTORNEYS FOR OLIN CORPORATION

CERTIFICATE OF SERVICE

I certify that on May 9, 2019, a true and correct copy of the foregoing instrument was served on all parties of record by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Alisha Mehta

Alisha Mehta