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

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§

PUBLIC UTILITY COMMISSION  
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**City of Houston's Motion to Intervene**

Pursuant to the Public Utility Regulatory Act, V.T.C.A. Utilities Code 33.025 (Vernon 1998) ("PURA") and Public Utilities Commission Procedural Rules 22.103 and 22.104, the City of Houston files this Motion to Intervene as a party in the above-captioned proceeding and in support thereof would respectfully show as follows:

**I. Authorized Representative**

1. The name address, and telephone numbers of the persons designated to represent the City of Houston are:

Alton J. Hall, Jr.  
Chelsea J. Lu  
ADAMS AND REESE LLP  
LyondellBasell Tower  
1221 McKinney St., Suite 4400  
Houston, Texas 77010  
(713) 652-5151  
(713) 652-5152 (Fax)  
[alton.hall@arlaw.com](mailto:alton.hall@arlaw.com)  
[chelsea.lu@arlaw.com](mailto:chelsea.lu@arlaw.com)

2. The City of Houston 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 City of Houston's designated representative(s).

## **II. Standing to Intervene**

3. As a municipality within whose corporate limits CenterPoint Energy Houston Electric LLC provides service, the City of Houston has standing to intervene as a party under Section 33.025 of PURA and the Commission's Procedural Rules 22.103 and 22.104.

4. The commission has jurisdiction over the parties and subject matter of the intervention pursuant to Chapter 36 of PURA.

## **III. Request to Intervene**

WHEREFORE PREMISES CONSIDERED, the City of Houston respectfully requests the Commission grant the City of Houston's Motion to Intervene.

Respectfully submitted,

Ronald C. Lewis  
City Attorney

YuShan Chang  
State Bar No. 24040670  
Senior Assistant City Attorney  
900 Bagby, 4th Floor  
Houston, Texas 77002  
(832) 393-6442  
(832) 393-6259 Facsimile  
[yushan.chang@houstontx.gov](mailto:yushan.chang@houstontx.gov)

Alton J. Hall, Jr.  
State Bar No.: 08743740  
Chelsea J. Lu  
State Bar No. 24095439  
ADAMS AND REESE LLP  
LyondellBasell Tower  
1221 McKinney St., Suite 4400  
Houston, Texas 77010  
(713) 651-5151  
(713) 652-5152 (Fax)  
[alton.hall@arlaw.com](mailto:alton.hall@arlaw.com)  
[chelsea.lu@arlaw.com](mailto:chelsea.lu@arlaw.com)

By:   
Alton J. Hall, Jr.

**Counsel for City of Houston**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 12<sup>th</sup> day of April, 2019, a true and correct copy of the foregoing document was served upon the parties of record by email, facsimile and/or First Class Mail.

  
Alton J. Hall, Jr.