



Control Number: 49421



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SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

2019 MAY 17 AM 11:46

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

§  
§  
§  
§

BEFORE THE STATE OFFICE

FILED  
FILING CLERK

ADMINISTRATIVE HEARINGS

**GENERATION PARK MANAGEMENT DISTRICT'S MOTION TO INTERVENE**

Generation Park Management District (GPMD), 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 name, address, and telephone number of the movant is:

Generation Park Management District  
1300 Post Oak Blvd., Suite 1400  
Houston, Texas 77056  
(713) 623-4531

2. The names, address, and telephone number of GPMD's authorized representatives are:

Mr. Rex D. VanMiddlesworth  
Mr. James Z. Zhu  
Thompson & Knight LLP  
98 San Jacinto Blvd., Suite 1900  
Austin, Texas 78701  
(512) 469-6100  
(512) 469-6180 (fax)  
[rex.vanm@tklaw.com](mailto:rex.vanm@tklaw.com)  
[james.zhu@tklaw.com](mailto:james.zhu@tklaw.com)  
[tk.eservice@tklaw.com](mailto:tk.eservice@tklaw.com)

All pleadings and other documents should be served upon GPMD's authorized representatives.

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

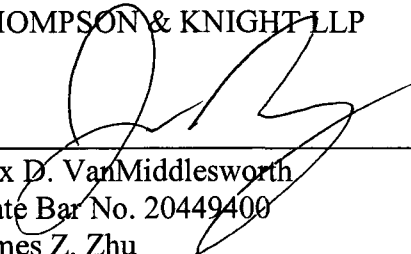
4. GPMD is a special district and political subdivision of the State of Texas created and operating pursuant to Chapter 3916, Texas Special District Local Laws Code. The territorial

limits of GPMD are within CenterPoint's service area, and GPMD pays CenterPoint's rates. Therefore, GPMD will be impacted by any determinations the Commission may make regarding CenterPoint's application. Accordingly, GPMD has a justiciable interest in this proceeding.

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

Respectfully submitted,

THOMPSON & KNIGHT LLP



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Rex D. VanMiddlesworth  
State Bar No. 20449400  
James Z. Zhu  
State Bar No. 24102683  
98 San Jacinto Blvd., Suite 1900  
Austin, Texas 78701  
(512) 469.6100  
(512) 469.6180 (fax)

ATTORNEYS FOR GENERATION PARK  
MANAGEMENT DISTRICT

### **CERTIFICATE OF SERVICE**

I, James Zhu, Attorney for GPMD, hereby certify that a copy of GPMD's Motion to Intervene was served on all parties of record in this proceeding on this 17<sup>th</sup> day of May, 2019 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



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James Zhu