



Control Number: 49421



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SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

2019 MAY 17 AM 11:47

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

§  
§  
§  
§

BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY  
COMMISSION  
ADMINISTRATIVE HEARINGS

**MCCORD DEVELOPMENT, INC.'S MOTION TO INTERVENE**

McCord Development, Inc. (McCord), 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:

McCord Development, Inc.  
250 Assay St., Suite 200  
Houston, Texas 77044  
(713) 860-3000

2. The names, address, and telephone number of McCord'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)  
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All pleadings and other documents should be served upon McCord'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. McCord is the developer of a 4,000-acre mixed-use development in CenterPoint's service area called Generation Park. As a developer, McCord pays for the installation of

electrical facilities under CenterPoint's tariff. Therefore, McCord will be impacted by any determinations the Commission may make regarding CenterPoint's application. Accordingly, McCord has a justiciable interest in this proceeding.

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

Respectfully submitted,

THOMPSON & KNIGHT LLP



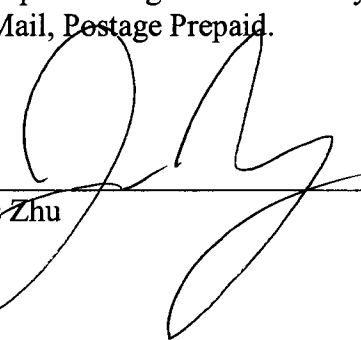
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ATTORNEYS FOR MCCORD DEVELOPMENT,  
INC.

### **CERTIFICATE OF SERVICE**

I, James Zhu, Attorney for McCord, hereby certify that a copy of McCord'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