



Control Number: 49421



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**SOAH DOCKET NO. 473-19-3864  
PUC DOCKET NO. 49421**

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

§  
§  
§  
§

**BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY REGULATION  
ADMINISTRATIVE HEARINGS**

2019/07/23 PM 1:46

**MOTION TO INTERVENE OF H-E-B, LP**

COMES NOW H-E-B, LP (“HEB”) and files this Motion to Intervene in the above-referenced proceeding and respectfully shows the following:

**I. INTRODUCTION**

On April 5, 2019, CenterPoint Energy Houston Electric, LLC (“CenterPoint”) filed an application with the Public Utility Commission of Texas (“Commission” or “PUC”) for regulatory approval to change its transmission and distribution rates. HEB seeks to intervene, comment, and fully participate as needed in this proceeding pursuant to the Public Utility Regulatory Act,<sup>1</sup> and Sections 22.101 through 22.104 of the Commission’s Procedural Rules [16 Texas Administrative Code (“TAC”) §§ 22.101 – 22.104]. As set forth below, HEB is a commercial customer of CenterPoint, has a justiciable interest which may be adversely affected by the outcome of this proceeding, and has standing to intervene in this proceeding. In accordance with 16 TAC § 22.104(b), this motion is timely filed within 45 days of the filing of the application.

**II. AUTHORIZED REPRESENTATIVES**

The names, addresses, and telephone numbers of HEB’s authorized outside counsel representatives are as follows:

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<sup>1</sup> Public Utility Regulatory Act, Tex. Util. Code §§ 11.001–66.016 (“PURA”).

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Carlos Carrasco  
Texas State Bar No. 24092223  
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HEB's authorized Company Representative and internal counsel is:

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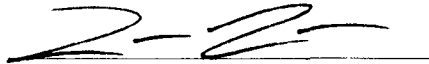
HEB hereby requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on its above-listed authorized representatives.

### **III. JUSTICIABLE INTEREST**

HEB operates several stores, gas stations, and other facilities that provide groceries and other products to customers in CenterPoint's service area. As a commercial customer of CenterPoint, HEB pays CenterPoint's current retail rates and will be assessed any new, revised rates for retail service that are approved in this proceeding. Accordingly, HEB has a justiciable interest in this case which will be affected by the decisions made herein. HEB's interests will not be adequately represented by any other party. HEB is intervening in this proceeding to protect its interests. Having demonstrated standing to intervene, as required by 16 TAC § 22.103, HEB's request for intervention should be granted.

WHEREFORE, PREMISES CONSIDERED, HEB respectfully requests that the ALJs grant its Motion to Intervene and admit HEB as an intervenor in this proceeding for all purposes, and grant HEB such other relief to which it may be justly entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D-Liebmann', written over a horizontal line.


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ATTORNEYS FOR H-E-B, LP

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document was served on all parties to this Docket on May 20, 2019.

  
Carlos Carrasco