



Control Number: 49421



Item Number: 259

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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**

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2019 JUN 20 PM 3:01
BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**MOTION TO INTERVENE OF THE
SOLAR ENERGY INDUSTRIES ASSOCIATION**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, the Solar Energy Industries Association (“SEIA”) ¹ and files this Motion to Intervene in the above-referenced proceeding pursuant to the Public Utility Regulatory Act (“PURA”), Texas Utilities Code §§ 11.001 et seq., and §§ 22.103(b) and 22.104 of the Commission’s Rules of Practice and Procedure, and would respectfully show as follows:

1. The name, address, and telephone number of the movant is:

Katherine Gensler
Solar Energy Industries Association
1425 K Street, N.W., Suite 1000
Washington, DC 20005
(202) 556-2873
(202) 682-0559 (FAX)
kgensler@seia.org

2. The name, address, and telephone number of SEIA’s attorney and authorized representative is:

Michael J. Jewell
Jewell & Associates, PLLC
4304 Balcones Drive
Austin, TX 78731-5708
(512) 423-4065
(512) 236-5170 (FAX)
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¹ The comments contained in this filing represent the position of SEIA as an organization, but do not necessarily reflect the views of any particular member with respect to any issue.

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All pleadings and other documents should be served upon SEIA's authorized representative.

3. This motion is timely filed on or before May 20, 2019, the intervention deadline the Administrative Law Judge established in Order No. 2.

4. SEIA is the national trade association of the solar energy industry. Through advocacy and education, SEIA and its members are building a strong solar industry to power America. As the voice of the industry, SEIA works to make solar a mainstream and significant energy source by expanding markets, removing market barriers, strengthening the industry, and educating the public on the benefits of solar energy. SEIA represents solar companies across a variety of solar energy technologies, including photovoltaic ("PV"), solar water heating, and concentrating solar power ("CSP").

5. SEIA has standing to intervene pursuant to §22.103(b) of the Commission's Procedural Rules because its members for this case include Sunrun Inc. ("Sunrun") and ENGIE North America, Inc. ("Engie"). Both Sunrun and Engie develop distributed generation resources in the CenterPoint Energy Houston Electric, LLC ("CenterPoint") service area and also have offices that are served by CenterPoint and pay CenterPoint retail delivery service rates. As discussed below, the relief CenterPoint has requested in this proceeding may adversely impact these SEIA members.

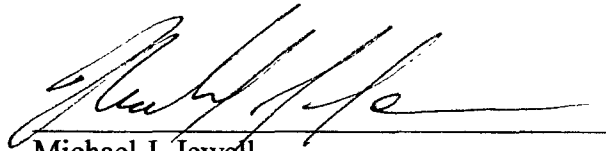
6. In its Application, CenterPoint requests authority to change its rates. CenterPoint requests approval for base rate increases of approximately \$154 million for service to retail customers and approximately \$6.8 million for wholesale transmission service based on a test year ending December 31, 2018. CenterPoint seeks authority to implement several non-rate changes to its Tariff for Retail Delivery Service ("Tariff"). In its Application, CenterPoint proposes changes in its Distribution Generation Service – Rate DGS, including increasing the fees charged

for pre-interconnection studies by as much as 404%. For non-exporting systems, CenterPoint proposes fee increases an average of 198%, and for exporting systems, proposes fee increases an average of 176%. CenterPoint's proposed rate increases will impact Sunrun's and Engie's electricity costs as customers of CenterPoint. In addition, CenterPoint's proposed pre-interconnection study fee increases will have a direct impact on the cost for Sunrun and Engie to develop new distributed generation units. As a result, the Commission's consideration of the relief CenterPoint has requested in this proceeding may adversely impact Sunrun and Engie who are customers of CenterPoint and will be directly impacted as ratepayers as well as members who sell, own, and/or operate solar systems installed on CenterPoint's distribution electric grid and will be impacted by the proposed changes to CenterPoint's proposed changes to its charges for fees for pre-interconnection studies.

7. SEIA member companies have offices located in the CenterPoint service area and sell, own, and/or operate solar installations in the CenterPoint territory. Accordingly, SEIA will be adversely affected by the Commission's decisions on the application at issue. Thus, SEIA has a justiciable interest in the outcome of this proceeding and requests that it be granted an opportunity to be heard.

For the above stated reasons, SEIA respectfully requests that the Commission grant this Motion to Intervene and admit SEIA as an intervener in this proceeding for all purposes and for such other relief to which it may be justly entitled.

Respectfully submitted,

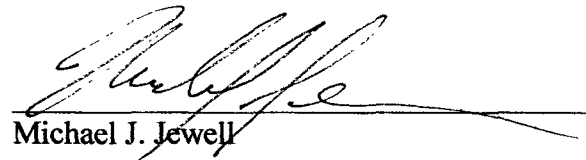


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ATTORNEY FOR THE SOLAR ENERGY
INDUSTRIES ASSOCIATION

CERTIFICATE OF SERVICE

I, Michael J. Jewell, Attorney and Representative for the Solar Energy Industries Association, certify that a copy of this document was served on all parties of record in this proceeding on the 20th day of May, 2019 by hand-delivery, facsimile transmission, electronic mail, and/or First Class U.S. Mail, postage prepaid, to all parties of record.



Michael J. Jewell