

Control Number: 49421



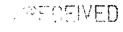
Item Number: 25

Addendum StartPage: 0

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

§

88888



APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES BEFORE THE STATE OFFICE
OFFICE
FILING CLERK
OF

ADMINISTRATIVE HEARINGS

ALLIANCE FOR RETAIL MARKETS' MOTION TO INTERVENE

Pursuant to 16 Texas Administrative Code ("TAC") §§ 22.103(b) and 22.104(a), the Alliance for Retail Markets ("ARM") files its motion to intervene in this proceeding. The individual member companies comprising ARM in this proceeding are Direct Energy, LP; NRG Retail Companies;¹ and TXU Energy Retail Company LLC. The members of ARM are competitive retail electric providers ("REPs") certificated to provide electric service to customers in areas subject to retail competition in Texas, including the service area of CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston").

ARM possesses a justiciable interest in this proceeding that may be adversely affected by the outcome of this docket. All REPs providing retail electric service in CenterPoint Houston's certificated service territory, including ARM's members, will be assessed any new and revised retail delivery rates approved in this docket.

ARM's authorized legal representative in this proceeding is:

Stephen J. Davis
Law Offices of Stephen J. Davis, PC
919 Congress Avenue
Suite 900
Austin, Texas 78701
512/479-9995
512/479-9996 (FAX)
davis@sidlawoffices.com

25

¹ NRG Companies include NRG Texas Power LLC, NRG Power Marketing LLC, Reliant Energy Retail Services LLC, Green Mountain Energy Company, Everything Energy LLC, US Retailers LLC, and NRG Curtailment Solutions LLC.

All pleadings, orders, and other documents should be served on ARM's authorized legal representative.

For the reasons stated in this Motion to Intervene, ARM has a substantial interest may be adversely affected by the outcome of this proceeding. In recognition of this justiciable interest, ARM seeks to intervene as a party. ARM respectfully requests that the Commission grant this Motion to Intervene, allow ARM to participate in this proceeding as a party, and grant ARM any other relief to which it may be entitled.

Respectfully submitted,

Stephen J. Davis

State Bar No. 05547750

LAW OFFICES OF STEPHEN J. DAVIS, P.C.

919 Congress Avenue

Suite 900

Austin, Texas 78701

(512) 479-9995

(512) 479-9996 (Fax)

davis@sidlawoffices.com

ATTORNEY FOR ALLIANCE FOR RETAIL MARKETS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on April 18, 2019 by first class mail.

Bv:

Stephen J. Davis