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SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

2019 JUL 20 PM 3:01
PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF CENTERPOINT §
ENERGY HOUSTON ELECTRIC, LLC §
FOR AUTHORITY TO CHANGE §
RATES §
§
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**MOTION TO INTERVENE OF
ENEL X NORTH AMERICA, INC.**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, Enel X North America, Inc. ("Enel X") 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:

Mona Tierney-Lloyd
Enel X
2071 Altair Lane
Reno, NV 89521
(415) 238-3788
Mona.tierney-lloyd@enel.com

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)
michael@jewellandassociates.com

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

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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. Enel X is a new Enel global business line dedicated to developing innovative products and digital solutions in sectors in which energy is showing the greatest potential for transformation: cities, homes, industries and electric mobility. Enel X in North America has nearly 3,400 business customers, spanning more than 10,400 sites, representing around 4.6 GW of demand response capacity and over 20 operational behind-the-meter storage projects. The company's intelligent DER Optimization Software is designed to analyze real-time energy and utility bill data, improve performance, and manage distributed energy assets, including behind-the-meter storage projects. Enel X's electric vehicle charging station technology, called JuiceBox®, and its JuiceNet® platform, provide smart management of electric vehicle charging and other distributed energy storage facilities. Enel X technology is present in more than 38,000 electric vehicle charging stations across North America.

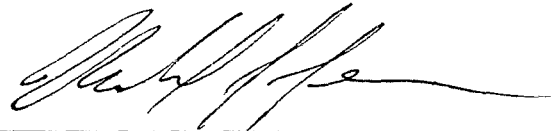
5. Enel X has standing to intervene pursuant to §22.103(b) of the Commission's Procedural Rules because it develops distributed generation resources in the CenterPoint Energy Houston Electric, LLC ("CenterPoint") service area. As discussed below, the relief CenterPoint has requested in this proceeding may adversely impact Enel X and its ability to sell its services in CenterPoint's service area.

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 increases to the fees it assesses for pre-interconnection studies will impact Enel X’s ability to sell on-site energy storage, electric vehicle charging optimization solutions, and other on-site customer generation capabilities, such as solar photovoltaics, that could be installed on CenterPoint’s distribution electric grid. As a result, Enel X 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, Enel X respectfully requests that the Commission grant this Motion to Intervene and admit Enel X as an intervener in this proceeding for all purposes and for such other relief to which it may be justly entitled.

Respectfully submitted,


A handwritten signature in black ink, appearing to read "Michael J. Jewell", written over a horizontal line.

Michael J. Jewell
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Austin, TX 78731
(512) 423-4065
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ATTORNEY FOR ENEL X NORTH
AMERICA, INC.

CERTIFICATE OF SERVICE

I, Michael J. Jewell, Attorney and Representative for Enel X, 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