



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  
ADMINISTRATIVE HEARINGS**

2019 MAY 21 AM 10:10  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**Houston Coalition of Cities' Motion to Intervene**

Pursuant to the Public Utility Regulatory Act, V.T.C.A. Utilities Code 33.025 (Vernon 1998) ("PURA") and Public Utilities Commission Procedural Rules 22.103 and 22.104, the Houston Coalition of Cities ("Coalition"), whose members are identified in Exhibit A hereto, file this Motion to Intervene as a party in the above-captioned proceeding and in support thereof would respectfully show as follows:

**I. Authorized Representative**

1. The name address, and telephone numbers of the persons designated to represent the Coalition are:

Alton J. Hall, Jr.  
Chelsea J. Lu  
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LyondellBasell Tower  
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[chelsea.lu@arlaw.com](mailto:chelsea.lu@arlaw.com)

2. The Coalition hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon the Coalition's designated representative(s).

## **II. Standing to Intervene**

3. As municipalities within whose corporate limits CenterPoint Energy Houston Electric LLC provides service, the Coalition has standing to intervene as a party under Section 33.025 of PURA and the Commission's Procedural Rules 22.103 and 22.104. (The List of Member Cities in Exhibit A is current. It will be updated as new members join.)

4. The Commission has jurisdiction over the parties and subject matter of the intervention pursuant to Chapter 36 of PURA.

## **III. Request to Intervene**


WHEREFORE PREMISES CONSIDERED, the Coalition respectfully requests the Commission grant the Coalition's Motion to Intervene as a party and to represent any cities that subsequently adopt motions, resolutions, or ordinances authorizing their participation in this proceeding.

Respectfully submitted,

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City Attorney

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By:   
Alton J. Hall, Jr.

**Counsel for Houston Coalition of Cities**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 20th day of May, 2019, a true and correct copy of the foregoing document was served upon the parties of record by email, facsimile and/or First Class Mail.

  
Alton J. Hall, Jr.

## **Exhibit A**

**Houston**  
**City of West University Place**  
**City of La Porte**  
**Oak Ridge North**  
**City of Bellaire**