

Control Number: 49421



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APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES PUBLIC UTILITY COMMISSION OF TEXAS

GULF COAST COALITION OF CITIES' <u>MOTION TO INTERVENE</u>

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COMES NOW, the Gulf Coast Coalition of Cities (GCCC) and files this Motion to Intervene as parties to the above-captioned proceeding. In support of its Motion, GCCC shows as follows:

- 1. GCCC is a coalition of municipalities located within the service territory of CenterPoint Energy Houston Electric, LLC (CenterPoint). A list of the GCCC cities is included as Attachment A.
- 2. On April 5, 2019, CenterPoint filed an application for authority to change rates. GCCC as well as its residents and businesses may be adversely impacted by CenterPoint's request. Therefore, GCCC has a justiciable interest in this proceeding.
- 3. Additionally, GCCC has standing to participate in this proceeding pursuant to Public Utility Regulatory Act (PURA) § 33.025.1
 - 4. GCCC's authorized representatives in this matter are:

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5. Docket No. 49421 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to timely reimbursement of rate case expenses.

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Public Utility Regulatory Act. Tex. Util. Code Ann. § 33.025 (PURA).

6. Movants expect other municipalities to intervene and seek consolidation with GCCC.

WHEREFORE, PREMISES CONSIDERED, GCCC respectfully requests that the Commission, CenterPoint, and all interested parties take notice of this Motion to Intervene and serve GCCC with copies of all documents filed in this docket and that GCCC be permitted to participate fully as a party in this proceeding.

Respectfully submitted,

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ATTORNEYS FOR GULF COAST COALITION OF CITIES

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by e-mail, fax, hand-delivery and/or regular, first class mail on this 4/2 day of April 2019 to all parties of record.

CHRISTOPHER L. BREWSTER

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Gulf Coast Coalition of Cities (39 Members)

Alvin

Brazos Country

Brookshire

Bunker Hill Village

Clear Lake Shores

Deer Park

Dickinson

Friendswood

Fulshear

Galveston

Hedwig Village

Hilshire Village

Hunters Creek

Iowa Colony

Jersey Village

Kemah

La Marque

Lake Jackson

Manvel

Missouri City

Mont Belvieu

Morgan's Point

Nassau Bay

Oyster Creek

Piney Point Village

Pleak

Rosenberg

Santa Fe

Seabrook

Sealy

Simonton

South Houston

Spring Valley Village

Sugar Land

Taylor Lake Village

Texas City

Tiki Island

Webster

Weston Lakes