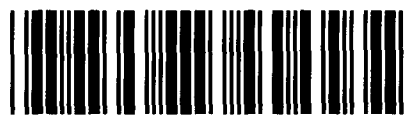




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APPLICATION OF EL PASO ELECTRIC §
COMPANY TO ADJUST ITS ENERGY §
EFFICIENCY COST RECOVERY §
FACTOR AND ESTABLISH REVISED §
COST CAP §

BEFORE THE STATE OFFICE
OF

ADMINISTRATIVE HEARINGS

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers ("TIEC"), pursuant to the Public Utility Regulatory Act ("PURA"), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

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

Texas Industrial Energy Consumers
c/o Mr. VJ Smith
Marathon Petroleum Corporation
212 N. Clark St.
El Paso, TX 79905

2. The names, address, and telephone number of TIEC's authorized representatives are:

Mr. Rex D. VanMiddlesworth
Mr. Benjamin Hallmark
Mr. James Zhu
Thompson & Knight LLP
98 San Jacinto Blvd., Suite 1900
Austin, TX 78701
(512) 469.6100
(512) 469.6180 (fax)
rex.vanm@tklaw.com
benjamin.hallmark@tklaw.com
james.zhu@tklaw.com
tk.eservice@tklaw.com

All pleadings and other documents should be served upon TIEC's authorized representatives.

3. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to address electricity matters in proceedings before the Commission.

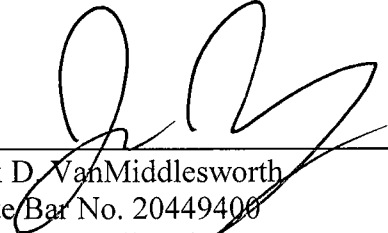
4. On May 1, 2019, El Paso Electric Company ("EPE") filed an application for approval to revise its Energy Efficiency Cost Recovery Factor ("EECRF") and request to establish a revised cost cap.

5. Because TIEC member companies own and operate industrial facilities in the EPE service territory and purchase electricity from EPE, TIEC members will be impacted by any determinations the Commission may make regarding EPE's application.

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

Respectfully submitted,

THOMPSON & KNIGHT LLP



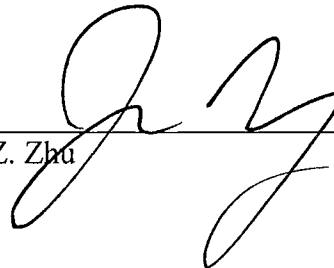
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ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, James Z. Zhu, Attorney for TIEC, hereby certify that a copy of TIEC's Motion to Intervene was served on all parties of record in this proceeding on this 14th day of May, 2019 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

James Z. Zhu

A handwritten signature in black ink, appearing to be 'JZ', is written over a horizontal line. The signature is stylized and cursive.