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APPLICATION OF TEXAS-NEW §  
MEXICO POWER COMPANY FOR §  
APPROVAL TO ADJUST THE §  
ENERGY EFFICIENCY COST §  
RECOVERY FACTOR §

BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
OF FILING CLERK  
ADMINISTRATIVE HEARINGS

**CITIES SERVED BY TEXAS-NEW MEXICO  
POWER COMPANY'S SECOND SUPPLEMENTAL MOTION TO INTERVENE**

COMES NOW, the Cities Served by Texas-New Mexico Power Company<sup>1</sup> (Cities) and files this Second Supplemental Motion to Intervene. The cities of Blue Ridge and Emory request to intervene in this proceeding and be aligned with Cities. In support of its Motion, Cities show as follows:

1. Cities are municipalities located within the service territory of Texas-New Mexico Power Company (TNMP). Cities as well as their residents and businesses may be adversely impacted by the relief requested by TNMP regarding its energy efficiency cost recovery factor.
2. On May 31, 2019, TNMP filed with the Public Utility Commission its Application to Adjust Its Energy Efficiency Cost Recovery Factor, which was referred to the State Office of Administrative Hearings (SOAH) on June 3, 2019.
3. On June 3, 2019, Cities filed a Motion to Intervene in this proceeding.
4. On June 24, 2019, Cities filed a Supplemental Motion to Intervene in this proceeding.
5. Additionally, Cities have standing pursuant to Public Utility Regulatory Act (PURA) § 33.025.<sup>2</sup>
6. Cities expect other municipalities to intervene and seek consolidation.

WHEREFORE, PREMISES CONSIDERED, Cities request that the Commission, TNMP, and all interested parties take notice of this Second Supplemental Motion to Intervene

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<sup>1</sup> Cities Served by TNMP include the following cities: Alvin, Dickinson, Farmersville, Friendswood, La Marque, and Texas City. Other cities are expected to join the coalition and will be added at a future date.

<sup>2</sup> Public Utility Regulatory Act, Tex. Util. Code Ann. § 33.025 (PURA).

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and that the cities of Blue Ridge and Emory be permitted to participate fully as parties to this proceeding.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

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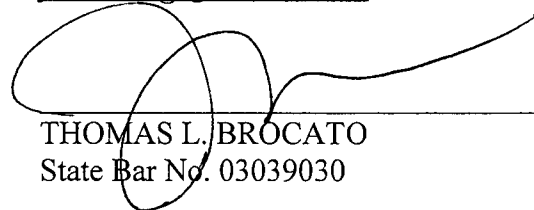
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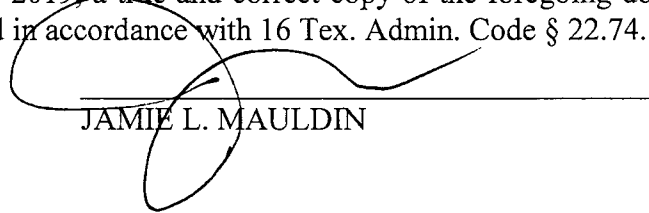
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ATTORNEYS FOR THE CITIES  
SERVED BY TNMP

**CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2019, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with 16 Tex. Admin. Code § 22.74.



JAMIE L. MAULDIN