



Control Number: 49586



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DOCKET NO. 49586

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

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2019 JUN 14 09
BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

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

COMES NOW, the Cities Served by Texas-New Mexico Power Company¹ (Cities) and files this Motion to Intervene. 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. Additionally, Cities have standing pursuant to Public Utility Regulatory Act (PURA) § 33.025.²

3. Cities' authorized representatives in this matter are:

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4. Docket No. 49586 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to timely reimbursement of rate case expenses.

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

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

WHEREFORE, PREMISES CONSIDERED, Cities request that this Motion to Intervene be granted.

Respectfully submitted,

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ATTORNEYS FOR THE CITIES
SERVED BY TNMP

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of June 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.



THOMAS L. BROCATO