



Control Number: 49831



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**SOAH DOCKET NO. 473-19-6677**  
**PUC DOCKET NO. 49831**

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**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE**  
**PUBLIC SERVICE COMPANY FOR § OF**  
**AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**MOTION TO INTERVENE (Out of Time)**  
**FOR AMARILLO RECYCLING COMPANY, INC.**

Amarillo Recycling Company, Inc. hereby files its Motion to Intervene (Out of Time) with regard to this proceeding, and states as follows:

1. Amarillo Recycling Company, Inc. is located at 3501 Sanborn Street, Amarillo, Texas.
2. Amarillo Recycling Company, Inc. is a family owned business doing business in the Texas Panhandle and the surrounding states. Amarillo Recycling Company, Inc. employs over 50 people. One facet of its operations is a car shredder, which was constructed in 2010 at an approximate cost of \$15,000,000.00.
3. Good cause exist for this intervention because Amarillo Recycling Company, Inc. has a direct, justiciable interest that may be adversely affected by these proceedings. Amarillo Recycling Company, Inc.'s interest relates to the Cost Allocation/Rate Design issues. Amarillo Recycling Company, Inc.'s issue is crucial to the continued economic future of Amarillo Recycling Company, Inc.
4. The undersigned believed that this Motion to Intervene had been filed on September 5, 2019. In fact, both the Motion to Intervene and the Protective Order Certification were emailed to all parties on September 5, 2019, as set forth in Exhibit A attached hereto. However, through an unintentional mistake, the Motion to Intervene and the Protective Order Certification did not actually get filed.

The undersigned, as Amarillo Recycling Company, Inc.'s attorney, is its authorized representative and all documents, pleadings, discovery, notices and related matters shall be served on him at P.O. Box 718, Dumas, Texas 79029 email address: [rick@lawmlr.com](mailto:rick@lawmlr.com).

Respectfully submitted,

**MOORE, LEWIS & RUSSWURM, P.C.**  
P.O. Box 718  
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157

By: 

Rick L. Russwurm  
Texas Bar No 17443550  
Attorney for Amarillo Recycling Company, Inc.

**CERTIFICATE OF SERVICE**

I certify that on October 8, 2019, a true and correct copy of the Motion to Intervene (Out of Time) for Amarillo Recycling Company, Inc., was served by email, fax or U.S. Mail on all known parties of record, including the following for Xcel Energy:

XCEL ENERGY SERVICES INC.  
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By: 

Rick L. Russwurm  
Attorney for Amarillo Recycling Company, Inc.

## **Rick Russwurm**

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**From:** Rick Russwurm  
**Sent:** Thursday, September 05, 2019 1:28 PM  
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**Subject:** SPS PUC 49831 - Amarillo Recycling Company, Inc.  
**Attachments:** Motion to Intervene - Amarillo Recycling Company, Inc..pdf; Protective Order Certification - ARC.pdf

September 5, 2019

Attached is the Motion to Intervene and the Protective Order Certification filed today on behalf of Amarillo Recycling Company, Inc.

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EXHIBIT A