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PUC DOCKET NO. 51415  
SOAH DOCKET NO. 473-21-0538

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APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § §	PUBLIC UTILITY REGULATORY COMMISSION OF TEXAS
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**EAST TEXAS SALT WATER DISPOSAL COMPANY'S MOTION TO INTERVENE**

East Texas Salt Water Disposal Company and East Texas Oil and Gas Producers<sup>1</sup> (collectively, "ETSWD"), 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 names, address, and telephone number of ETSWD's authorized representatives are:

Todd F. Kimbrough  
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Dane McKaughan  
Texas Bar No. 24007651  
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All pleadings and other documents should be served upon ETSWD's authorized representatives.

2. On October 14, 2020, Southwestern Electric Power Company ("SWEPCO") filed an application for authority to change rates.

<sup>1</sup> East Texas Oil and Gas Producers includes the following: BASA Resources, Inc., John Linder Operating Co. LLC; Falcon Resources, Inc.; R2Q Operating, LLC; and 4-Sight Operating Co. Ltd.

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3. ETSWD is an industrial consumer of electricity in the Kilgore, Texas area and purchases electricity from SWEPCO. ETSWD's electric rates will be affected by the outcome of this proceeding.

4. ETSWD operates facilities for oil and gas producers in the East Texas oil field known as the Woodbine formation.

5. Because ETSWD owns and operates facilities in the SWEPCO service territory and purchases electricity from SWEPCO, ETSWD will be impacted by any determinations the Commission may make regarding SWEPCO's application.

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

Respectfully submitted,

/s/ Todd F. Kimbrough

Todd F. Kimbrough

Texas Bar No. 24050878

Dane McKaughan

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**ATTORNEYS FOR EAST TEXAS SALT  
WATER DISPOSAL COMPANY**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served by email, facsimile, hand-delivery, overnight delivery, or 1st Class U.S. Mail on all parties of record in this proceeding on November 30, 2020.

/s/ Todd F. Kimbrough  
Todd F. Kimbrough