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DOCKET NO. 51476

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PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF EL PASO	§	BEFORE THE
ELECTRIC COMPANY TO AMEND	§	
ITS CERTIFICATE OF	§	PUBLIC UTILITY COMMISSION
CONVENIENCE AND NECESSITY	§	
FOR THE PINE-TO-SEABACK 115-KV	§	OF TEXAS
TRANSMISSION LINE IN EL PASO		
COUNTY		

CITY OF EL PASO'S MOTION TO INTERVENE

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Comes now the City of El Paso (the "City") and files this Motion to Intervene in the above styled and numbered docket and as grounds for said intervention would respectfully show the Commission as follows:

1. The City is a duly incorporated home rule city served by El Paso Electric Company and is a regulatory authority having original jurisdiction over electric rates and service by EL Paso Electric Company. The Mayor of the City is Dee Margo whose office address is 300 N. Campbell, El Paso, Texas 79901. The attorneys for the City are Karla Nieman, City Attorney, Josette Flores, Senior Assistant City Attorney, Abbie Mullin, Assistant City Attorney, and Russell Abeln, Assistant City Attorney, 300 N Campbell, El Paso, Texas 79901, 915-212-0033, fax, 915-212-0034.

2. The City files this Motion pursuant to the Commission's Procedural Rules on behalf of its citizens, as an affected person and as a municipality regarding a utility serving within its corporate limits. The City is entitled to intervene pursuant to Tex. Util. Code Ann. § 33.025 (West).

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The City prays that this Motion to Intervene be granted and that it be given full rights of a party, including the right to appear at any and all proceedings involving this docket, conduct discovery, present evidence, cross-examine witnesses and present legal arguments.

Respectfully submitted,

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Attorneys for Intervener

City of El Paso

CERTIFICATE OF SERVICE

I, Manny Arambula, Attorney for the City of El Paso, certify that on December 23, 2020, a true and correct copy of the foregoing document was served electronically or mail on:

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