



Control Number: 52067



Item Number: 5

Addendum StartPage: 0

PUCT DOCKET NO. 52067

**APPLICATION OF ENTERGY
TEXAS, INC. TO ADJUST ITS
ENERGY EFFICIENCY COST
RECOVERY FACTOR AND
REQUEST TO ESTABLISH
REVISED COST CAPS** §
§
§
§
§
§

**PUBLIC UTILITY COMMISSION
OF TEXAS**

2011 MAY 13 PM 2:02

CITIES' MOTION TO INTERVENE

The Cities of Anahuac, Beaumont, Bridge City, Cleveland, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pine Forest, Pinehurst, Port Arthur, Port Neches, Roman Forest, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, West Orange, and Willis ("Cities") file this Motion to Intervene in the above styled and numbered docket. In support of the motion, Cities state the following:

1. Movants are municipalities located in the service territory of Entergy Texas, Inc. ("ETI"). Municipalities have standing in each proceeding before the Commission that relates to an electric utility providing service in the municipality, as provided by Public Utility Regulatory Act ("PURA") § 33.025. Entergy Texas, Inc. provides service inside the corporate boundaries of Cities.
2. In addition, Cities and their residents within the ETI boundaries of Cities have a justiciable interest that may be adversely affected by ETI's application. Thus, Cities have standing to intervene pursuant to 16 Texas Administrative Code ("TAC") § 22.103 and the motion is timely filed in accordance with 16 TAC § 22.104.
3. Cities' authorized representative is Daniel J. Lawton, 12600 Hill Country Bld., Suite R-275, Austin, Texas 78738; telephone (512) 322-0019; fax (512) 329-2604. Service of all pleadings and other documents should be made upon Cities' authorized representative. Cities request that all e-mail correspondence be directed to Daniel J. Lawton at danlawtonlawfirm@gmail.com and Molly Mayhall Vandervoort at molly@mayhallvandervoort.com.

5

PRAYER

For the above stated reasons, Cities respectfully request that Cities' Motion to Intervene in this proceeding be granted along with all other relief to which they may show themselves to be justly entitled.

Respectfully submitted,
LAWTON LAW FIRM, P.C.



Daniel J. Lawton 00791082
Molly Mayhall Vandervoort 24048265
12600 Hill Country Blvd., Suite R275
Austin, Texas 78738
(512) 322-0019
(512) 329-2604 Fax
ATTORNEY FOR CITIES

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this the 18th day of May, 2021, in accordance with 16 TAC § 22.74.



Molly Mayhall Vandervoort