



Control Number: 52194



Item Number: 10

Addendum StartPage: 0

**SOAH DOCKET NO. 473-21-2530  
PUC DOCKET NO. 52194**

<b>APPLICATION OF CENTERPOINT</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ENERGY HOUSTON ELECTRIC, LLC</b>	<b>§</b>	
<b>FOR APPROVAL OF AN ADJUSTMENT</b>	<b>§</b>	<b>OF</b>
<b>TO ITS ENERGY EFFICIENCY</b>	<b>§</b>	
<b>COST RECOVERY FACTOR</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**CITY OF HOUSTON’S MOTION TO INTERVENE**

Pursuant to Public Utility Commission (“PUC” or “Commission”) Procedural Rules 22.103 and 22.104, the City of Houston files this Motion to Intervene as a party in the above-captioned proceeding and in support thereof would respectfully show as follows:

**I. AUTHORIZED REPRESENTATIVE**

1. The names, address and telephone numbers of the person(s) designated to represent the City of Houston are:

YuShan Chang  
Sr. Assistant City Attorney  
City of Houston Legal Department  
900 Bagby, 4<sup>th</sup> Floor  
Houston, TX 77002  
832.393.6442  
832.393.6259 (Facsimile)  
[YuShan.Chang@houstontx.gov](mailto:YuShan.Chang@houstontx.gov)

Alisa Talley  
Division Manager  
Administration & Regulatory Affairs Department  
City of Houston  
611 Walker, 13<sup>th</sup> Floor  
Houston, Texas 77002  
832.393.8531  
832.393.8527 (Facsimile)  
[Alisa.Talley@houstontx.gov](mailto:Alisa.Talley@houstontx.gov)

2. The City of Houston hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon the City of Houston's designated representatives.

## II. STANDING TO INTERVENE

3. The City of Houston has standing to intervene under P.U.C. Proc. Rules 22.103 and 22.104 as a party with justiciable interest which may be adversely affected by the outcome of this docket.

4. The City of Houston has original jurisdiction over the rates, operations, and services of an electric utility in areas in the municipality pursuant to § 33.001 of PURA<sup>1</sup>.

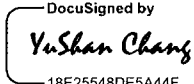
5. The City of Houston has a justiciable interest in the outcome of CenterPoint Energy Houston Electric, LLC's ("CenterPoint") request for approval of an adjustment to its energy efficiency cost recovery factor because it may affect the rates for CenterPoint customers within the City of Houston.

## III. REQUEST TO INTERVENE

WHEREFORE PREMISES CONSIDERED, the City of Houston respectfully requests the Commission grant the City of Houston's Motion to Intervene.

Respectfully submitted

CITY OF HOUSTON, TEXAS

By:   
YUSHAN CHANG  
State Bar No. 24040670

ARTURO G. MICHEL, CITY ATTORNEY  
P.O. Box 368, Houston, Texas 77001-0368

<sup>1</sup> Public Utility Regulatory Act, TEX. UTIL. CODE ANN. ' 33.001 (Vernon1998 & Supp. 2005) (PURA).

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832.393.6259 (FAX)

ATTORNEYS FOR THE CITY OF HOUSTON, TEXAS  
CITY OF HOUSTON, TEXAS

**CERTIFICATE OF SERVICE**

I, YuShan Chang, Senior Assistant City Attorney for City of Houston hereby certify that on this 9th day of June 2021, a true and correct copy of the foregoing document was served upon all parties of record by email pursuant to Order Suspending Rules in PUC Docket No. 50664.

DocuSigned by:  
*YuShan Chang*  
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YuShan Chang