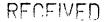


Control Number: 52194

Item Number: 7

Addendum StartPage: 0



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

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APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR APPROVAL OF AN ADJUSTMENT TO ITS ENERGY EFFICIENCY COST RECOVERY FACTOR

#### **BEFORE THE**

## PUBLIC UTILITY COMMISSION

#### **OF TEXAS**

# THE GULF COAST COALITION OF CITIES' MOTION TO INTERVENE

COMES NOW, the Gulf Coast Coalition of Cities (GCCC) and files this Motion to Intervene. In support of its Motion, GCCC shows as follows:

- 1. GCCC is a coalition of municipalities located within the service territory of CenterPoint Energy Houston Electric, LLC (CenterPoint). A list of the GCCC cities is included as Attachment A.
- 2. On June 1, 2021, CenterPoint filed an application for an approval of an adjustment to its energy efficiency cost recovery factor (EECRF). GCCC as well as its residents and businesses may be adversely impacted by the relief requested by CenterPoint regarding the EECRF. Therefore, GCCC has a justiciable interest in this proceeding.
- 3. Additionally, GCCC has standing to participate in this proceeding pursuant to Public Utility Regulatory Act (PURA) § 33.025.<sup>1</sup>
  - 4. GCCC's authorized representatives in this matter are:

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Taylor P. Denison
Lloyd Gosselink Rochelle & Townsend, P.C.
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5. Docket No. 52194 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to timely reimbursement of rate case expenses.

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<sup>&</sup>lt;sup>1</sup> Public Utility Regulatory Act, Tex. Util. Code Ann. § 33.025 (PURA).

WHEREFORE PREMISES CONSIDERED, GCCC requests that this Motion to Intervene be granted.

Respectfully submitted,

LLOYD GOSSELINK ROCHELLE & TOWNSEND, P.C.

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ATTORNEYS FOR THE GULF COAST COALITION OF CITIES

#### **CERTIFICATE OF SERVICE**

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on June 4, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

2

THOMAS I DECCATO

### Gulf Coast Coalition of Cities (41)

Alvin

**Brazos Country** 

Brookshire

Bunker Hill Village

Clear Lake Shores

Deer Park

Dickinson

Friendswood

Fulshear

Galveston

Hedwig Village

Hilshire Village

Hunters Creek

Iowa Colony

Jersey Village

Kemah

La Marque

Lake Jackson

Manvel

Missouri City

Mont Belvieu

Morgan's Point

Nassau Bay

Oyster Creek

Pattison

Piney Point Village

Pleak

Rosenberg

Santa Fe

Seabrook

Sealy

Simonton

South Houston

Spring Valley Village

Stafford

Sugar Land

Taylor Lake Village

Texas City

Tiki Island

Webster

Weston Lakes

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