



Control Number: 52195



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PUC DOCKET NO. 52195
SOAH DOCKET NO. 473-21-2606

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APPLICATION OF EL PASO § **PUBLIC UTILITY COMMISSION**
ELECTRIC COMPANY § **OF**
TO CHANGE RATES § **TEXAS**

MOTION IN INTERVENTION OF
TEXAS COTTON GINNERS' ASSOCIATION

COME NOW Texas Cotton Ginnners' Association (hereinafter, "TCGA") and files this, its Motion to Intervene in the above-captioned docket. In support of this Motion, TCGA would show the following:

I.

The name, address, telephone number and e-mail address of TCGA is as follows:

TEXAS COTTON GINNERS' ASSOCIATION
Tony D. Williams
J. Kelley Green
211 W. Bagdad Ave.
Round Rock, Texas 78664
(512) 476-8388 (Office)
(512) 476-8215 (Fax)
tony@tcga.org
kelley@tcga.org

II.

The name, address, telephone number and e-mail address of TCGA's authorized representative is as follows:

BRADY & HAMILTON, LLP
Zachary S. Brady
Laura Pratt
1602 13th Street
Lubbock, Texas 79401
(806) 771-1850 (Office)
(806) 771-3750 (Fax)
zach@bhlawgroup.com
laura@bhlawgroup.com

TCGA requests that the Public Utility Commission of Texas (“the Commission”) and all parties to this proceeding serve copies of all correspondence, pleadings, briefs, and other documents upon TCGA’s authorized representative at the Lubbock address shown above.

III.

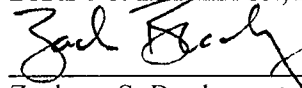
TCGA represents cotton gins around the state. The members of TCGA gin approximately 98 percent of all cotton ginned in Texas.

The TCGA member gins in the Applicant’s service area, listed in Exhibit A, will be affected by the Commission’s decision in this case. The outcome of this case will likely impact the rates paid by and terms of service provided to TCGA members. Therefore, TCGA has a substantial and vital interest in the outcome of this hearing and requests the opportunity to be heard.

TCGA will accept and abide by any existing procedural schedule in this matter.

NOW THEREFORE, for the above-mentioned reasons, TCGA respectfully requests that this, its Motion in Intervention in the above-captioned case be granted and request any other relief to which it may show itself entitled.

Respectfully submitted,
BRADY & HAMILTON, LLP



Zachary S. Brady
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1602 13th Street
Lubbock, Texas 79401
Telephone: (806) 771-1850
Facsimile: (806) 771-3750

ATTORNEYS FOR INTERVENOR
TEXAS COTTON GINNERS’ ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties of record, via facsimile, or U.S. mail, electronic mail or e-service on this 16th day of June, 2021.

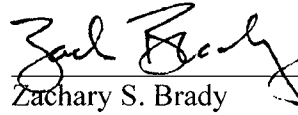

Zachary S. Brady

EXHIBIT A –TCGA MEMBER GINS

COUNTY	GINNAME
El Paso	Valley Gin Co.