



Filing Receipt

Received - 2021-07-15 02:44:13 PM
Control Number - 52195
ItemNumber - 48

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

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO CHANGE	§	OF
RATES	§	ADMINISTRATIVE HEARINGS
	§	

W. SILVER INC.'S MOTION TO INTERVENE

W. Silver, Inc. ("W. Silver") files this Motion to Intervene in the above-referenced proceeding pursuant to 16 TEXAS ADMINISTRATIVE CODE ("TAC") §§ 22.103(b) and 22.104. In support of its motion, W. Silver respectfully shows:

I. AUTHORIZED REPRESENTATIVE

W. Silver's authorized legal representatives in this proceeding are:

Carrie Collier-Brown
Matthew A. Arth
LOCKE LORD LLP
600 Congress Avenue
Suite 2200
Austin, Texas 78701
(512) 305-4732 (telephone)
(512) 391-4883 (fax)
carrie.collierbrown@lockelord.com
matthew.arth@lockelord.com

All pleadings, orders and other documents should be served upon W. Silver's authorized representatives.

II. MOTION TO INTERVENE

On June 1, 2021, El Paso Electric Company ("EPE") filed an application with the Public Utility Commission of Texas ("Commission") to change rates. W. Silver purchases electricity from EPE, and W. Silver's electric rates will be affected by the outcome of this proceeding. W. Silver is an affected person within the meaning of PURA § 11.003 and an intervenor within the meaning of the Commission's procedural rules 16 TAC §§ 22.2(25) and 22.103. Thus, W. Silver has a justiciable interest in this proceeding that may be adversely affected by the outcome of this docket.

III. CONCLUSION

For the above stated reasons, W. Silver respectfully requests that this Motion to Intervene be granted, that it be afforded full party status in this matter, and that it have any further or additional relief to which it may be entitled.

Dated: July 15, 2021

Respectfully submitted,

/s/ Carrie Collier-Brown (with permission)

LOCKE LORD LLP
Carrie Collier-Brown
State Bar No. 24065064
Matthew A. Arth
State Bar No. 24090806
600 Congress Avenue, Suite 2200
Austin, Texas 78701
(512) 305-4732 (telephone)
(512) 391-4883 (fax)
carrie.collierbrown@lockelord.com
matthew.arth@lockelord.com

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties to this proceeding on July 15, 2021 via email in accordance with the instructions in SOAH Order No. 2.

/s/ Matthew Arth

Matthew A. Arth