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PUC DOCKET NO. 52195 SOAH DOCKET NO. 473-21-2606 JUN 11 AM 9: 20

APPLICATION OF EL PASO

PUBLIC UTILITY COMMISSION

ELECTRIC COMPANY TO CHANGE

RATES

§ § §

OF TEXAS

CITY OF EL PASO'S MOTION TO INTERVENE

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Comes now the City of El Paso (the "City") and files this Motion to Intervene in the above styled and numbered docket and as grounds for said intervention would respectfully show the Commission as follows:

- 1. The City is a duly incorporated home rule city served by El Paso Electric Company and is a regulatory authority having original jurisdiction over electric rates and service by El Paso Electric Company. The Mayor of the City is Oscar Leeser whose office address is 300 N. Campbell, El Paso, Texas 79901. The attorneys for the City are Karla Nieman, City Attorney, 300 N. Campbell, El Paso, Texas 79901, Manuel Arambula, Senior Assistant City Attorney, (915)212-0033, fax (915)212-0034; and Norman J. Gordon, Attorney, P. 0. Box 8, El Paso, Texas 79940, 915-203-4883.
- 2. The City files this Motion pursuant to the Commission's Procedural Rules on behalf of its citizens, as an affected person and as a municipality regarding a utility serving within its corporate limits. The City is entitled to intervene pursuant to TEX. UTIL. CODE ANN. 33.025 (PURA).

The City prays that this Motion to Intervene be granted and that it be given full rights of a party including the right to appear at any and all proceedings involving this docket, conduct discovery, present evidence, cross-examine witnesses and present legal arguments.

Respectfully submitted,

Norman J. Gordon (ngordon@ngordonlaw.com)
State Bar No. 08203700
P.O. Box 8
El Paso, Texas, 79940
221 N. Kansas, Suite 700
El Paso, Texas, 79901
(915) 203 4883

Karla M. Nieman, City Attorney
State Bar No. 24048542
Manuel Arambula, Senior Assistant City Attorney
State Bar No. 24047423
City of El Paso
300 N. Campbell, 2nd Floor
El Paso, Texas 79901
(915) 212-0033
(915) 212-0034 (fax)
Arambulam1@elpasotexas.gov

Attorneys for the City of El Paso

Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on June 11, 2021.

Norman J. Gordon