

Control Number: 52195



Item Number: 9

Addendum StartPage: 0

## PUC DOCKET NO. 52195 1 2 SOAH DOCKET NO. 473-21-2606 7301 JUN 15 PN 2: 56

APPLICATION OF EL PASO§PUBLIC UTILITY COMMISSIONELECTRIC COMPANY TO§ELECTRIC COMPANY TOCHANGE RATES§OF TEXAS

## THE UNIVERSITY OF TEXAS AT EL PASO'S MOTION TO INTERVENE

The University of Texas at El Paso (UTEP"), pursuant to the Public Utility Regulatory Act

(PURA"), Tex. Util. Code Ann. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the

Commission's Rules of Practice and Procedures, files this Motion to Intervene in the above-

referenced proceeding, respectfully showing as follows:

1. The name, address, and telephone number of the movant are:

The University of Texas at El Paso c/o Priscilla M. Castillo, Chief Legal Officer Office of Legal Affairs 500 West University Avenue El Paso, TX 79968 (915) 747-5056 (915) 747-6016 (Fax) Email: <u>castillop@utep.edu</u>

2. The name address, and telephone number of UTEP's authorized representatives are:

ALTON J. HALL, JR. State Bar No.: 08743740 Adams and Reese LLP LyondellBasell Tower 1221 McKinney St., Suite 4400 Houston, Texas 77010 (713) 308-0106 (713) 308-4032 (Fax) Email: <u>Alton.Hall@arlaw.com</u>

All pleadings and other documents should be served upon UTEP's authorized representatives.

3. UTEP is an institution of higher education authorized under the laws of the State of Texas and a member institution of The University of Texas System. UTEP's principal purposes are delivery of higher education and research.

4. On June 1, 2021, El Paso Electric Company (EPE) filed an Application to Change Rates. UTEP operates facilities in the EPE service territory and purchases electricity from EPE. Accordingly, UTEP will be impacted by the Commission's decisions on the Application at issue. Thus, UTEP has a justiciable interest in the outcome of this proceeding and requests that it be granted an opportunity to be heard.

For the above stated reasons, UTEP respectfully requests that the Commission grant this Motion to Intervene and admit UTEP as an intervener in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

> ALTON J. HALL, JR. State Bar No.: 08743740 Adams and Reese LLP LyondellBasell Tower 1221 McKinney St., Suite 4400 Mission, Texas 77010 (713) 308-0106 (713) 308-4032 (Fax) Email: Alton.Hall@arlaw.com

By: <u>/s/ Alton J. Hall, Jr.</u> Alton J. Hall, Jr.

## ATTORNEYS FOR THE UNIVERSITY OF TEXAS AT EL PASO

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15nd day of June, 2021, a true and correct copy of the foregoing document was served upon on all parties of record by electronic mail pursuant to the Order in Docket No. 52195.

/s/ Alton J. Hall, Jr.

Alton J. Hall, Jr.