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SOAH DOCKET NO. 473-21-2531

PUC DOCKET NO. 52199

2021 JUN 17 AM 9:06

APPLICATION OF AEP TEXAS INC. § BEFORE THE STATE OFFICE  
FOR APPROVAL TO ADJUST §  
ENERGY EFFICIENCY COST § OF  
RECOVERY FACTOR AND RELATED § ADMINISTRATIVE HEARINGS  
RELIEF

**CITIES SERVED BY  
AEP TEXAS'  
MOTION TO INTERVENE**

COMES NOW, the Cities Served by AEP Texas (Cities)<sup>1</sup> and files this Motion to Intervene as a party to this proceeding. In support of its Motion, Cities show as follows:

1. Cities are municipalities located within the service territory of AEP Texas, Inc. (AEP Texas).

2. On June 1, 2021, AEP Texas filed an application to adjust its energy efficiency cost recovery factor (EECRF). Cities, as well as their residents and businesses, may be adversely impacted by the relief requested by AEP Texas regarding its EECRF. Therefore, Cities have a justiciable interest in this proceeding.

3. Additionally, Cities has standing pursuant to Public Utility Regulatory Act (PURA) § 33.025.<sup>2</sup>

4. Cities' authorized representatives in this matter are:

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<sup>1</sup> Cities Served by AEP Texas include the following cities: Haskell, McAllen, Portland, Vernon and Weslaco. Other cities are expected to join the coalition and will be added at a future date.

<sup>2</sup> Public Utility Regulatory Act, Tex. Util. Code Ann. § 33.025 (PURA).

5. Docket 52199 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to timely reimbursement of rate case expenses.

WHEREFORE, PREMISES CONSIDERED, Cities request that this Motion to Intervene be granted.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

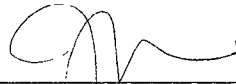
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**ATTORNEYS FOR THE CITIES  
SERVED BY AEP TEXAS**

**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on June 17, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



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JAMIE L. MAULDIN