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SOAH DOCKET NO. 473-22-1070

PUC DOCKET NO. 52221

COMPLAINT OF THIGBE AGGREGATION MEMBERS (OVER 50 KW) AGAINST MIDAMERICAN ENERGY SERVICES LLC	§ § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**THIGBE AGGREGATION MEMBERS (OVER 50 KW)’S MOTION TO
CONSOLIDATE AND ADOPT PROCEDURAL SCHEDULE OF DOCKET NO. 52512**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW, Thigbe Aggregation Members (Over 50 KW) (“Thigbe,” or “Complainant”) and files this Motion to Consolidate and Adopt Procedural Schedule of Docket No. 52512.

Thigbe’s complaint asserts that MidAmerican Energy Services, LLC (“MidAmerican”) billed its members for unauthorized electricity charges in the form of “supplemental ancillary charges” during the month of February, 2021. Thigbe’s complaint is one of approximately sixteen complaints currently pending against MidAmerican at the Commission on substantively similar issues regarding unauthorized electricity charges.

In Docket No. 52512, which involves the complaint of GNL Ridglea, LLC against MidAmerican, Order No. 3 was issued on December 29, 2021 preliminarily adopting a procedural schedule and setting a second prehearing conference for January 7, 2022. Order No. 3 noted that the vast majority of the issues in dispute in all the complaints pending against MidAmerican involved essentially the same contractual language and that the parties generally supported

consolidating these similar cases at SOAH in the interest of judicial efficiency. Order No. 3 further stated that possible consolidation would be discussed at the January 7, 2022 prehearing conference.

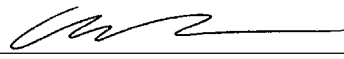
Thigbe agrees with the parties that participated in the prehearing conference in Docket No. 52512 that the issues in the MidAmerican complaint cases are substantively identical and that consolidation of the cases would be beneficial for the parties and facilitate judicial efficiency.

Thigbe therefore respectfully requests that its complaint be consolidated with Docket No. 52512 and all other MidAmerican complaint cases currently pending at SOAH that are procedurally appropriate to consolidate at the January 7, 2022 prehearing conference.

Thigbe further requests that, once consolidated, this docket adopt the procedural schedule preliminarily approved in Docket No. 52512, particularly with respect to the dates for pre-testimony discovery and dispositive motions.

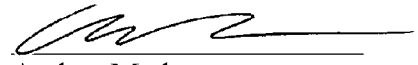
Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that on January 5, 2022, a true and correct copy of this document was served on the following parties by electronic mail and first class mail.


Andres Medrano