



Filing Receipt

Received - 2021-09-10 11:52:32 AM

Control Number - 52485

ItemNumber - 13

PUC DOCKET NO. 52485

APPLICATION OF SOUTHWESTERN	§	
PUBLIC SERVICE COMPANY TO	§	
AMEND ITS CERTIFICATE OF	§	PUBLIC UTILITY COMMISSION
CONVENIENCE AND NECESSITY TO	§	
CONVERT HARRINGTON	§	OF TEXAS
GENERATING STATION FROM	§	
COAL TO NATURAL GAS	§	

TEXAS INDUSTRIAL ENERGY CONSUMERS’ MOTION TO INTERVENE

Texas Industrial Energy Consumers (“TIEC”), 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 names, address, and telephone number of TIEC’s authorized representatives are:

Mr. Rex D. VanMiddlesworth
Mr. Benjamin B. Hallmark
Mr. Christian E. Rice
O’Melveny & Myers LLP
303 Colorado St., Suite 2750
Austin, TX 78701
(737) 261-8600
rexvanm@omm.com
bhallmark@omm.com
crice@omm.com
OMMeservice@omm.com

All pleadings and other documents should be served upon TIEC’s authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC’s principal purpose is to address electricity matters in proceedings before the Commission.

3. On August 27, 2021, Southwestern Public Service Company (SPS) filed an application to amend its certificate of convenience and necessity to convert the three generation units at Harrington Generating Station from coal generation to natural gas generation.

4. Because TIEC member companies own and operate industrial facilities in the SPS service territory and purchase electricity from SPS, TIEC members will be impacted by any determinations the Commission may make regarding SPS's application.

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

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Benjamin B. Hallmark

Rex D. VanMiddlesworth

State Bar No. 20449400

Benjamin B. Hallmark

State Bar No. 24069865

Christian E. Rice

State Bar No. 24122294

303 Colorado St., Suite 2750

Austin, TX 78701

(737) 261-8600

rexvanm@omm.com

bhallmark@omm.com

crice@omm.com

OMMeservice@omm.com

**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, Christian E. Rice, Attorney for TIEC, hereby certify that a copy of TIEC's Motion to Intervene was served on all parties of record in this proceeding on this 10th day of September, 2021 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Christian E. Rice

Christian E. Rice