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Received - 2021-11-19 12:46:38 PM Control Number - 52485 ItemNumber - 60

PUC DOCKET NO. 52485

APPLICATION OF SOUTHWESTERN **ELECTRIC POWER COMPANY TO** AMEND ITS CERTIFICATE OF **CONVENIENCE AND NECESSITY TO CONVERT HARRINGTON GENERATING STATTION FROM COAL TO NATURAL GAS**

PUBLIC UTILITY COMMISSION OF **TEXAS**

MOTION TO INTERVENE OF THE ALLIANCE OF XCEL MUNICIPALITIES

Pursuant to 16 Tex. Admin. Code (TAC) §§ 22.101, 22.102, 22.103, and 22.104, the

Alliance of Xcel Municipalities¹ (AXM) file their motion to intervene, and in support thereof shows

as follows:

- 1. AXM is a coalition of municipalities located in the service territory of Southwestern Public Service Company ("SPS") AXM was formed to address the municipalities' concerns with, and interest in, utility rates, services, and operations.
- AXM, its residents, and businesses located within city limits may be adversely impacted by 2. the outcome of this proceeding in terms of rates, services, and operations SPS provides within the corporate limits of the AXM cities. As such AXM comprises an affected person with standing to intervene
- 3. AXM hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs, or other documents upon the AXM's designated representatives.
- 4. AXM's authorized representatives in this matter are:

Alfred R. Herrera Sergio E. Herrera HERRERA LAW & ASSOCIATES, PLLC P.O. Box 302799 Austin, Texas 78703 4524 Burnet Road Austin, Texas 78756 512-474-1492 (Voice) 512-474-2507 (Fax) aherrera@herreralawpllc.com

Alliance of Xcel Municipalities' Motion to Intervene

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¹ In prior proceedings, AXM has included the Cities of Amarillo, Borger, Canyon, Dalhart, Dimmitt, Dumas, Hereford, Levelland, Littlefield, Muleshoe, Pampa, Perryton, Plainview, and Slaton. AXM will confirms its member Cities in future filings as necessary.

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5. Therefore, AXM respectfully urges the Administrative Law Judge to grant AXM's motion to intervene in this proceeding and to grant it any other relief to which it may be entitled.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

P.O. Box 302799 Austin, Texas 78703 4524 Burnet Road Austin, Texas 78756 (512) 474-1492 (voice) (512) 474-2507 (fax)

By: /s/ Alfred R. Herrera

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ATTORNEYS FOR ALLIANCE OF XCEL MUNICIPALITIES

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November, 2021, a true and correct copy of **Alliance** of **Xcel Municipalities**' *Motion to Intervene* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: <u>/s/Leslie Lindsey</u>

Leslie Lindsey