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PUC DOCKET NO. 52689

EXPEDITED PETITION OF CENTERPOINT	§	PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR APPROVAL OF INTERIM LOAD	§	OF
MANAGEMENT PROGRAMS FOR	§	
NONRESIDENTIAL CUSTOMERS AND	§	TEXAS
FOR AN ACCOUNTING ORDER	§	

CITY OF HOUSTON’S MOTION TO INTERVENE

Pursuant to Public Utility Commission (“PUC” or “Commission”) Procedural Rules 22.103 and 22.104, the City of Houston files this Motion to Intervene as a party in the above-captioned proceeding and in support thereof would respectfully show as follows:

I. AUTHORIZED REPRESENTATIVE

1. The names, address and telephone numbers of the person(s) designated to represent the City of Houston are:

YuShan Chang, Sr. Assistant City Attorney
City of Houston Legal Department
900 Bagby, 4th Floor
Houston, TX 77002
832.393.6442
832.393.6259 (Facsimile)
YuShan.Chang@houstontx.gov

Nicholas Hadjigeorge
Executive Staff Analyst
Administration & Regulatory Affairs Department
City of Houston
611 Walker, 13th Floor
Houston, Texas 77002
832.393.8507
832.393.8527 (Facsimile)
Nicholas.Hadjigeorge@houstontx.gov

2. The City of Houston 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 City of Houston's designated representatives.

II. STANDING TO INTERVENE

3. The City of Houston has standing to intervene under P.U.C. Proc. Rules 22.103 and 22.104 as a party with justiciable interest which may be affected by the outcome of this docket. The City of Houston is a nonresidential customer served by CenterPoint Energy Houston Electric, LLC ("CenterPoint").

4. The City of Houston also has standing to intervene under §33.025 of the Texas Utilities Code because this proceeding relates to CenterPoint providing electric utility service within the City of Houston.

III. REQUEST TO INTERVENE

WHEREFORE PREMISES CONSIDERED, the City of Houston respectfully requests the Commission grant the City of Houston's Motion to Intervene.

Respectfully submitted,

CITY OF HOUSTON, TEXAS
ARTURO G. MICHEL, CITY ATTORNEY

DocuSigned by:
YuShan Chang
By: _____
18E25548DE5A44F...
YuShan Chang
Senior Assistant City Attorney
State Bar No. 24040670

P.O. Box 368, Houston, Texas 77001-0368
City Hall Annex, 900 Bagby, 4th Floor
Houston, Texas 77002
(832) 393-6442 (phone)
(832) 393-6259 (fax)
yushan.chang@houstontx.gov

ATTORNEYS FOR THE CITY OF
HOUSTON, TEXAS

CERTIFICATE OF SERVICE

I, YuShan Chang, Senior Assistant City Attorney for City of Houston hereby certify that on this 2nd day of November 2021, a true and correct copy of the foregoing document was served upon all parties of record by email pursuant to Order Suspending Rules in PUC Docket No. 50664.

DocuSigned by:
YuShan Chang
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YuShan Chang