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PUC DOCKET NO. 52689

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

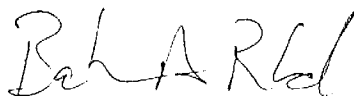
**OFFICE OF PUBLIC UTILITY COUNSEL'S
MOTION TO INTERVENE**

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a)(3)(A)-(B), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel (“OPUC”) moves to intervene in this proceeding as a matter of right on behalf of residential and small commercial consumers. OPUC’s Interim Public Counsel has determined that residential and small commercial consumers are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute.

Dated: November 4, 2021

Respectfully submitted,

Chris Ekoh
Interim Public Counsel
State Bar No. 06507015



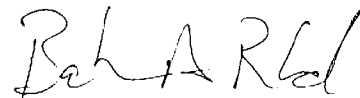
Barham A. Richard
Assistant Public Counsel
State Bar No. 24056201
Tucker Furlow
Senior Assistant Public Counsel
State Bar No. 24060897
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397

512-936-7500 (Telephone)
512-936-7525 (Facsimile)
barham.richard@opuc.texas.gov (Service)
tucker.furlow@opuc.texas.gov (Service)
opuc_eservice@opuc.texas.gov (Service)

ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
PUC DOCKET NO. 52689

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 4th day of November 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.



Barham A. Richard