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

**TEXAS COMPETITIVE POWER ADVOCATES  
MOTION TO INTERVENE**

Texas Competitive Power Advocates (TCPA), pursuant to 16 TAC § 22.103 and 22.104 of the Commission’s Procedural Rules, and Order No. 1 issued on October 12, 2021, files this Motion to Intervene in the above-referenced proceeding.

**I. Standing to Intervene**

TCPA is a trade association representing power generation companies and wholesale power marketers with investments in Texas and ERCOT’s wholesale electric market. TCPA members and their affiliates provide a wide range of important market functions and services in ERCOT, including the development, operation, and management of power generation assets, the scheduling and marketing of power, the provision of energy management services, and sales of competitive electric service to consumers. TCPA members provide nearly ninety percent of the non-wind electric generating capacity in ERCOT, represent billions of dollars of investment in the state, and employ thousands of Texans.

On April 5, 2019, AEP Texas, Inc. (AEP), CenterPoint Energy Houston Electric LLC (CenterPoint), and Texas-New Mexico Power Company (TNMP) (together, Joint TDUs) filed an expedited petition requesting approval of the design and operation of load management programs for the period of December 1, 2021 through February 28, 2022 and the recording of a regulatory

asset for any and all costs associated with the design and operation of the Interim Load Management Programs. The Joint TDU's application could have significant impacts on the ERCOT electric wholesale market. Therefore, TCPA has a justiciable interest that may be adversely affected by the outcome of this proceeding and has standing to intervene in this proceeding.

## **II. Authorized Representative**


The name, address and telephone number of TCPA's authorized representative in this case is as follows:

Andres Medrano  
Foley & Lardner LLP  
600 Congress Avenue  
Suite 3000  
Austin, Texas 78701-2978  
(512) 542-7013  
(512) 542-7100 (Fax)  
[amedrano2@foley.com](mailto:amedrano2@foley.com)

## **III. Conclusion**

For the above-stated reasons, TCPA respectfully requests that its Motion to Intervene be granted and that TCPA be admitted as an intervenor in this proceeding for all purposes, and for any other relief to which it may be entitled.

Respectfully submitted,

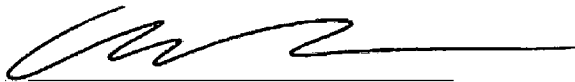


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**ATTORNEY FOR TEXAS  
COMPETITIVE POWER ADVOCATES**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served via facsimile or first-class mail to all parties of record in this proceeding on this 9<sup>th</sup> day of November, 2021.

A handwritten signature in black ink, appearing to read 'Andres Medrano', written over a horizontal line.

Andres Medrano