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EXPEDITED PETITION FOR	§	PUBLIC UTILITY
APPROVAL OF INTERIM LOAD	§	
MANAGEMENT PROGRAMS FOR	§	COMMISSION OF TEXAS
NONRESIDENTIAL CUSTOMERS AND	§	
FOR AN ACCOUNTING ORDER	§	

THE JOINT TDUS' MOTION TO ADMIT

AEP Texas Inc. (AEP Texas); CenterPoint Energy Houston Electric, LLC (CenterPoint Houston); and Texas-New Mexico Power Company (TNMP) (collectively, the Joint TDUs) file this Motion to Admit. In support of their Motion to Admit, the Joint TDUs state the following:

I. Background

On October 8, 2021, the Joint TDU's filed their Expedited Petition that requested expedited approval of the Joint TDUs: (1) designing and operating load management programs for nonresidential customers during the period of December 1, 2021 through February 28, 2022 (the Interim Load Management Programs) and (2) recording a regulatory asset for the reasonable and necessary costs associated with the design and operation of the Interim Load Management Programs and for future load management programs for nonresidential customers.

On November 9, 2021, Public Utility Commission of Texas (Commission) Staff and the Joint TDUs filed a Stipulation and Settlement Agreement (Agreement) that resolves the Joint TDUs' Expedited Petition and their respective Interim Load Management Programs.

II. Motion to Admit

The Joint TDUs request that the following be admitted into evidence:

- Expedited Petition (filed on October 8, 2021);
- The Joint TDUs' Response to Order No. 2 and respective proofs of notice (filed on October 22, 2021);
- The Joint TDUs' Additional Information and description of the Joint TDUs' respective Interim Load Management Programs (filed on November 1, 2021);
- Agreement (filed on November 9, 2021);
- Direct Testimony of Shea Richardson (filed on November 9, 2021);


- Direct Testimony of Robert Cavazos (filed on November 9, 2021); and
- Direct Testimony of Stefani Case (filed on November 9, 2021).

III. Conclusion

The Joint TDUs request that the Commission grant their request and admit into evidence the items described above.

Date: November 9, 2021

Respectfully submitted,



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On Behalf of the Joint TDUs

CERTIFICATE OF SERVICE

I, Pandy Livingston, certify that a copy of this document was served on all parties of record in this proceeding on November 9, 2021, by e-mail pursuant to the Order Suspending Rules - PUC Docket No. 50664.

