



Filing Receipt

Received - 2021-10-22 02:14:12 PM

Control Number - 52689

ItemNumber - 6

PUC DOCKET NO. 52689

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

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers (“TIEC”), pursuant to the Public Utility Regulatory Act (“PURA”), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission’s Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of TIEC’s authorized representatives are:

Katherine L. Coleman
Michael A. McMillin
John R. Hubbard
O'Melveny & Myers LLP
303 Colorado Street, Suite 2750
Austin, TX 78701
(737) 261-8600
kcoleman@omm.com
mmcmillin@omm.com
jhubbard@omm.com
ommesevice@omm.com

All pleadings and other documents should be served upon TIEC’s authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC’s principal purpose is to address electricity matters in proceedings before the Commission.

3. On October 8, 2021, AEP Texas Inc., CenterPoint Energy Houston Electric, LLC, and Texas-New Mexico Power Company. (collectively, the Joint TDUs) filed an expedited petition for Commission to authorize the Joint TDUs to: (i) design and operate an interim load management

program for nonresidential consumers (during December 1, 2021 to February 28, 2022), and (ii) record a regulatory asset for any costs associated with developing and operating those programs.

4. Because TIEC member companies own and operate industrial facilities who will be affected by and ultimately bear the cost of the interim load management programs, TIEC members will be impacted by any determinations the Commission may make regarding the Joint TDUs' petition.

For the above stated reasons, TIEC respectfully requests that the Commission grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Katie Coleman

Katherine L. Coleman

State Bar No. 24059596

Michael A. McMillin

State Bar No. 24088034

John R. Hubbard

State Bar No. 24120909

303 Colorado Street, Suite 2750

Austin, TX 78701

(737) 261-8600

kcoleman@omm.com

mmcmillin@omm.com

jhubbard@omm.com

OMMeservice@omm.com

**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 22nd day of October, 2021 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard