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**EXPEDITED PETITION FOR APPROVAL §
OF INTERIM LOAD MANAGEMENT §
PROGRAMS FOR NONRESIDENTIAL §
CUSTOMERS AND FOR AN §
ACCOUNTING ORDER §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**GULF COAST COALITION OF CITIES’
MOTION TO INTERVENE**

COMES NOW, the Gulf Coast Coalition of Cities (GCCC) and files this Motion to Intervene in the above-styled proceeding. In support thereof, GCCC shows the following:

1. 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 approval of interim load management programs for non-residential customers and for an accounting order.

2. GCCC has a justiciable interest in this proceeding, as it is a coalition of municipalities located within the service territory of CenterPoint Energy Houston Electric, LLC and Texas-New Mexico Power Company. A list of GCCC cities is included as Attachment A.

3. Additionally, GCCC has standing to participate in this proceeding pursuant to Public Utility Regulatory Act (PURA) § 33.025.¹

4. GCCC’s authorized representative in this matter is:

Thomas L. Brocato
LLOYD GOSSELINK ROCHELLE & TOWNSEND, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
512-322-5800 Telephone
512-472-0532 Facsimile
tbrocato@lglawfirm.com

GCCC requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and all other documents in this proceeding be served upon its authorized representative

¹ Public Utility Regulatory Act, Tex. Util. Code Ann. § 33.025 (PURA).

WHEREFORE PREMISES CONSIDERED, GCCC requests that this Motion to Intervene be granted and any other relief to which it may be entitled.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

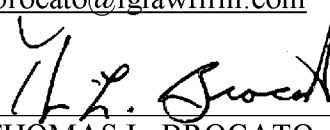
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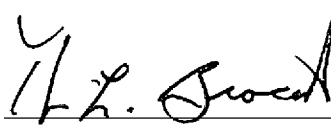
THOMAS L. BROCATO

State Bar No. 03039030

**ATTORNEYS FOR GULF COAST
COALITION OF CITIES**

CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of this document was provided to all parties of record via electronic mail on October 26, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



THOMAS L. BROCATO

Gulf Coast Coalition of Cities (41)

Alvin
Brazos Country
Brookshire
Bunker Hill Village
Clear Lake Shores
Deer Park
Dickinson
Friendswood
Fulshear
Galveston
Hedwig Village
Hilshire Village
Hunters Creek
Iowa Colony
Jersey Village
Kemah
La Marque
Lake Jackson
Manvel
Missouri City
Mont Belvieu
Morgan's Point
Nassau Bay
Oyster Creek
Pattison
Piney Point Village
Pleak
Rosenberg
Santa Fe
Seabrook
Sealy
Simonton
South Houston
Spring Valley Village
Stafford
Sugar Land
Taylor Lake Village
Texas City
Tiki Island
Webster
Weston Lakes