



## Filing Receipt

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**DOCKET NO. 53267**

<b>APPLICATION OF AEP TEXAS INC.</b>	<b>§</b>	
<b>FOR APPROVAL OF A WHOLESALE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>DISTRIBUTION SERVICE</b>	<b>§</b>	
<b>DISTRIBUTED GENERATION ENERGY</b>	<b>§</b>	<b>OF TEXAS</b>
<b>STORAGE TARIFF</b>	<b>§</b>	

**SMT MCALLEN LLC'S MOTION TO INTERVENE**

SMT McAllen LLC ("SMT McAllen") moves to intervene in the above-styled proceeding pursuant to 16 Tex. Admin. Code §§ 22.101, 22.103(b), and 22.104. SMT McAllen would show as follows:

1. The names, address, and telephone number of SMT McAllen's authorized representatives are:

John Switzer  
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SMT McAllen LLC  
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All pleadings and other documents should be served upon SMT McAllen's authorized representatives.

2. On February 24, 2022, AEP Texas Inc. (“AEP”) filed an application for approval of a new Wholesale Distribution Service Distributed Generation (“WDS DG”) Energy Storage Tariff to establish rates and other terms and conditions for distributed generation energy storage facilities that take wholesale service at distribution voltage from AEP.

3. SMT McAllen is developing a battery energy storage project within the AEP service territory that will be interconnected at distribution voltage. SMT McAllen has applied for interconnection with AEP Texas and is currently in the interconnection study process. SMT McAllen is therefore directly affected by the application filed, and the decisions made, in this docket.

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

Respectfully submitted,

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By: /s/ Alaina Zermeno

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**ATTORNEYS FOR:  
SMT MCALLEN LLC**

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on the 28<sup>th</sup> day of March 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Alaina Zermeno  
Alaina Zermeno