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APPLICATION OF AEP TEXAS INC. FOR APPROVAL TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

TEXAS ENERGY ASSOCIATION FOR MARKETERS' MOTION TO INTERVENE

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Texas Energy Association for Marketers (TEAM) files this Motion to Intervene and respectfully requests that TEAM be granted party status in this proceeding.

I. BACKGROUND

On June 1, 2022, AEP Texas Inc. (AEP) filed an application to adjust its energyefficiency cost recovery factor (EECRF) for program year 2023 under Public Utility Regulatory Act (PURA)¹ § 39.905 and 16 Texas Administrative Code (TAC) §§ 25.181 and 25.182 (the Application). An intervention deadline has not yet been established in this proceeding, and neither PURA § 39.905 nor 16 TAC §§ 25.181 and 25.182 prescribe the length of the intervention period. Absent a specific intervention period in statute or rule, the intervention deadline under 16 TAC § 22.104(b) is 45 days from the date the application is filed unless otherwise ordered by the presiding officer. Therefore, this motion is timely filed.

II. MOTION TO INTERVENE

TEAM seeks to participate in this proceeding pursuant to 16 TAC §§ 22.103 and 22.104. TEAM is a non-profit industry association whose members are retail electric providers (REPs) certificated by the Commission to provide competitive retail electric service in regions of Texas that are open to competition. The members of TEAM, as individual REPS, will be responsible

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.017.

for payment of any rates or other charges approved in this proceeding. As such, TEAM has a justiciable interest that may be affected by the outcome of this proceeding and should be granted party status.

III. AUTHORIZED REPRESENTATIVES

TEAM requests that all future discovery, pleadings, orders, and correspondence regarding this case be served on its authorized representatives, in accordance with the following service address:

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IV. CONCLUSION

TEAM respectfully requests that it be granted intervenor status to participate as a party in

this proceeding.

Respectfully submitted,

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ATTORNEY FOR TEXAS ENERGY ASSOCIATION FOR MARKETERS

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 June 6, 2022 in accordance with the Order Suspending Rules, issued in Project No. 50664.

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