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PUC DOCKET NO. 53679
SOAH DOCKET NO. 473-22-00990

APPLICATION OF AEP TEXAS INC.	§	BEFORE THE
TO ADJUST ITS ENERGY	§	
EFFICIENCY COST RECOVERY	§	PUBLIC UTILITY COMMISSION
FACTOR AND RELATED RELIEF	§	OF TEXAS

**CITIES SERVED BY
AEP TEXAS’
MOTION TO INTERVENE**

COMES NOW, the Cities Served by AEP Texas (Cities)¹ and files this Motion to Intervene as a party to this proceeding. In support of its Motion, Cities shows as follows:

1. Cities is made up of municipalities located within the service territory of AEP Texas, Inc. (AEP Texas).

2. On June 1, 2022, AEP Texas filed an application to adjust its energy efficiency cost recovery factor (EECRF). Cities’ members, as well as their residents and businesses, may be adversely impacted by the relief requested by AEP Texas regarding its EECRF. Therefore, Cities has a justiciable interest in this proceeding.

3. Additionally, Cities has standing pursuant to Public Utility Regulatory Act (PURA) § 33.025.²

4. Cities’ authorized representatives in this matter are:

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¹ At this time, Cities Served by AEP Texas includes the city of McAllen. Other cities are expected to join the coalition and will be added at a future date.

² Public Utility Regulatory Act, Tex. Util. Code Ann. § 33.025 (PURA).

5. Docket 53679 constitutes a ratemaking proceeding for purposes of PURA § 33.023 and participating cities are entitled to timely reimbursement of rate case expenses.

WHEREFORE, PREMISES CONSIDERED, Cities requests that this Motion to Intervene be granted.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
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**ATTORNEYS FOR THE CITIES
SERVED BY AEP TEXAS**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on June 8, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN