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PUC DOCKET NO. 54614

APPLICATION OF EL PASO ELECTRIC	§	PUBLIC UTILITY COMMISSION
COMPANY FOR APPROVAL OF ITS	§	OF TEXAS
TEXAS ELECTRIC VEHICLE-READY	§	
PILOT PROGRAMS AND TARIFFS	§	

CITY OF EL PASO’S MOTION TO INTERVENE

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Comes now the City of El Paso (the “City”) and files this Motion to Intervene in the above styled and numbered docket and as grounds for said intervention would respectfully show the Commission as follows:

1. The City is a duly incorporated home rule city served by El Paso Electric Company and is a regulatory authority having original jurisdiction over electric rates and service by El Paso Electric Company. The Mayor of the City is Oscar Leeser whose office address is 300 N. Campbell, El Paso, Texas 79901. The attorneys for the City are Karla Nieman, City Attorney, Juan S. Gonzalez, Senior Assistant City Attorney, Donald C. Davie, Assistant City Attorney, and Ayana I. Estrada, Assistant City Attorney, 300 N Campbell, El Paso, Texas 79901, 915-212-0033, fax, 915-212-0034.
2. The City files this Motion pursuant to the Commission’s Procedural Rules on behalf of its citizens, as an affected person and as a municipality regarding a utility serving within its corporate limits. The City is entitled to intervene pursuant to TEX. UTIL. CODE ANN. § 33.025 (PURA).

The City prays that this Motion to Intervene be granted and that it be given full rights of a party, including the right to appear at any and all proceedings involving this docket, conduct discovery, present evidence, cross-examine witnesses and present legal arguments.

Respectfully submitted,

Karla M. Nieman, City Attorney
State Bar No. 24048542
City of El Paso

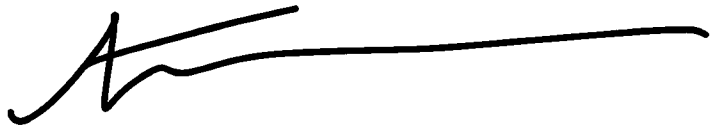
Donald C. Davie
Assistant City Attorney
State Bar No. 24095524
City of El Paso

Ayana I. Estrada
Assistant City Attorney
State Bar No. 24115051
City of El Paso

300 N. Campbell, 2nd Floor
El Paso, Texas 79901
(915) 212-0033
(915) 212-0034 (fax)
Niemarkm@elpasotexas.gov
Daviedc@elpasotexas.gov
EstradaAI@elpasotexas.com

Attorneys for City of El Paso

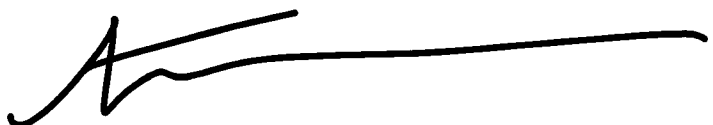
By:



Ayana I. Estrada

CERTIFICATE OF SERVICE

I, Matt Marquez, Attorney for the City of El Paso, certify that a true and correct copy of this document was served electronically or U.S. mail on all parties of record in this proceeding on March 9, 2023.



Ayana I. Estrada