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Received - 2023-03-20 02:42:35 PM
Control Number - 54614
ItemNumber - 9

PUC DOCKET NO. 54614

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

OFFICE OF PUBLIC UTILITY COUNSEL'S

MOTION TO INTERVENE

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a)(3)(A)-(B), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of the residential and small commercial consumers in El Paso Electric Company's ("EPE") service territory. OPUC's Chief Executive and Public Counsel has determined that residential and small commercial consumers in EPE's service territory are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute. Staff of the Public Utility Commission ("Staff") and EPE are unopposed to OPUC's motion to intervene.

Date: March 20, 2023

Respectfully submitted,

Courtney Hjaltman
Chief Executive and Public Counsel
State Bar No. 24070294



Renee L. Wiersema
Assistant Public Counsel
State Bar No. 24094361
Justin Swearingen
Senior Assistant Public Counsel
State Bar No. 24096794
Chris Ekoh
Deputy Public Counsel
State Bar No. 06507015

OFFICE OF PUBLIC UTILITY COUNSEL
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397
512-936-7500 (Telephone)
512-936-7525 (Facsimile)
renee.wiersema@opuc.texas.gov (Service)
justin.swearingen@opuc.texas.gov (Service)
chris.ekoh@opuc.texas.gov (Service)
opuc_eservice@opuc.texas.gov (Service)

**ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL**

CERTIFICATE OF SERVICE
PUC DOCKET NO. 54614

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 20th day of March 2023 by facsimile, electronic mail, and/or first class, U.S. Mail.



Renee L. Wiersema