

# **Filing Receipt**

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## SOAH DOCKET NO. 473-23-20743 PUC DOCKET NO. 55088

APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	
TO ADJUST ITS ENERGY EFFICIENCY	§	
COST RECOVERY FACTOR	Ş	OF ADMINISTRATIVE HEARINGS

## CITY OF HOUSTON'S MOTION TO INTERVENE

Pursuant to Public Utility Commission ("PUC" or "Commission") Procedural Rules 22.103 and 22.104, the City of Houston files this Motion to Intervene as a party in the above-captioned proceeding and in support thereof would respectfully show as follows:

#### I. AUTHORIZED REPRESENTATIVE

1. The names, address and telephone numbers of the person(s) designated to represent the City of Houston are:

YuShan Chang Sr. Assistant City Attorney City of Houston Legal Department 900 Bagby, 4<sup>th</sup> Floor Houston, TX 77002 832,393,6442 832,393,6259 (Facsimile) YuShan.Chang@houstontx.gov

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2. The City of Houston hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence,

pleadings, briefs or other documents upon the City of Houston's designated representatives.

### II. STANDING TO INTERVENE

- 3. The City of Houston has standing to intervene under P.U.C. Proc. Rules 22.103 and 22.104 as a party with justiciable interest which may be affected by the outcome of this docket.
- 4. The City of Houston has original jurisdiction over the rates, operations, and services of an electric utility in areas in the municipality pursuant to § 33.001 of the Texas Utilities Code.
- 5. The City of Houston has a justiciable interest in the outcome of CenterPoint Energy Houston Electric, LLC's ("CenterPoint") request for approval of an adjustment to its energy efficiency cost recovery factor because it may affect the rates for CenterPoint customers within the City of Houston.

## III. REQUEST TO INTERVENE

WHEREFORE PREMISES CONSIDERED, the City of Houston respectfully requests the Commission grant the City of Houston's Motion to Intervene.

Respectfully submitted,

CITY OF HOUSTON, TEXAS
ARTURO G. MICHEL, CITY ATTORNEY

By: YuShan Chang

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ATTORNEYS FOR THE CITY OF HOUSTON, TEXAS

## CERTIFICATE OF SERVICE

I, YuShan Chang, Senior Assistant City Attorney for City of Houston hereby certify that on this <a href="https://doi.org/10.2023">6th</a> day of June 2023, a true and correct copy of the foregoing document was served upon all parties of record by email pursuant to Order Suspending Rules in PUC Docket No. 55088.

YuShan Chang

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YuShan Chang