



## **Filing Receipt**

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**Item Number - 18**

**SOAH DOCKET NO. 473-23-20742  
PUC DOCKET NO. 55094**

**APPLICATION OF AEP TEXAS INC.  
TO ADJUST ITS ENERGY  
EFFICIENCY COST RECOVERY  
FACTOR AND RELATED RELIEF**

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**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

**CITIES SERVED BY AEP TEXAS'S  
SUPPLEMENTAL MOTION TO INTERVENE**

COMES NOW, the Cities Served by AEP Texas (Cities)<sup>1</sup> files this Supplemental Motion to Intervene a party to the above-captioned proceeding. In support thereof, Cities shows as follows:

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

2. On June 1, 2023, AEP filed an application to adjust its energy efficiency cost recovery factor (EECRF). Cities, as well as their residents and businesses, may be adversely impacted by the relief requested by AEP regarding its EECRF. Therefore, Cities has a justiciable interest in this proceeding.

3. On June 15, 2023, Cities filed its Motion to Intervene in this proceeding.<sup>2</sup>

4. Cities requests that the additional cities listed in Attachment A be added to the list of cities participating in this proceeding.

5. Additionally, Cities has standing pursuant to Public Utility Regulatory Act (PURA) § 33.025.<sup>3</sup>

6. Docket No. 55094 constitutes a ratemaking proceeding for purposes of PURA § 33.023, and participating cities are entitled to timely reimbursement of rate case expenses.<sup>4</sup>

7. The authorized representatives for Cities are:

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<sup>1</sup> The Cities Served by AEP Texas include the City of McAllen.

<sup>2</sup> Cities Served by AEP Texas Motion to Intervene (June 15, 2023).

<sup>3</sup> Public Utility Regulatory Act, Tex. Util. Code Ann. § 33.025 (PURA).

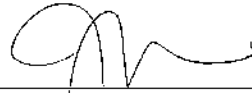
<sup>4</sup> PURA § 33.023.

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WHEREFORE, PREMISES CONSIDERED, Cities respectfully request that this Supplemental Motion to Intervene be granted and that the Cities listed in Attachment A to be permitted to participate fully as parties to this proceeding.

Respectfully submitted,

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**ATTORNEYS FOR THE  
CITIES SERVED BY AEP TEXAS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was sent on this 28th day of June, 2023, to the parties of record.



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JAMIE L. MAULDIN

<b>Additional Cities Requesting Participation</b>
Alamo
Alton
Benjamin
Brownsville
Ingleside on the Bay
Kingsville
Turkey