



Filing Receipt

Filing Date - 2024-03-01 01:31:36 PM

Control Number - 56165

Item Number - 14

PUC DOCKET NO. 56165

**APPLICATION OF
AEP TEXAS INC. FOR
AUTHORITY TO CHANGE RATES**

§
§
§
§
§

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

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

COMES NOW, the Cities Served by AEP Texas (Cities)¹ and file this Motion to Intervene as a party to this proceeding. In support thereof, Cities show as follows:

1. Cities are municipalities located within the service territory of AEP Texas Inc. (AEP).

2. On February 29, 2024, AEP filed an application for authority to change rates. Cities, as well as their residents and businesses, may be adversely impacted by AEP's request. Therefore, Cities have a justiciable interest in this proceeding.

3. Additionally, Cities have standing to participate in this proceeding pursuant to Public Utility Regulatory Act (PURA) § 33.025.²

4. Cities' authorized representatives in this matter are:

Thomas L. Brocato
Samantha N. Miller
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800 Tel.
(512) 472-0532 Fax
tbrocato@lglawfirm.com
smiller@lglawfirm.com

5. Docket No. 56165 constitutes a ratemaking proceeding for purposes of PURA § 33.023, and participating cities are entitled to timely reimbursement of rate case expenses.³

¹ Cities Served by AEP Texas include 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).

³ PURA § 33.023.

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

Respectfully submitted,

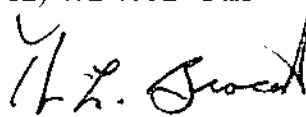
**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

Austin, Texas 78701

(512) 322-5800 Tel.

(512) 472-0532 Fax



THOMAS L. BROCATO

State Bar No. 03039030

tbrocato@lglawfirm.com

SAMANTHA N. MILLER

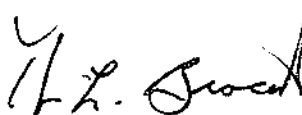
State Bar No. 24131515

smiller@lglawfirm.com

**ATTORNEYS FOR 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 March 01, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.



THOMAS L. BROCATO