

Filing Receipt

Filing Date - 2024-04-19 09:19:56 AM

Control Number - 56211

Item Number - 102

SOAH DOCKET NO. 473-24-13232 DOCKET NO. 56211

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES **BEFORE THE STATE OFFICE**

OF

ADMINISTRATIVE HEARINGS

SMT TX MANAGEMENT II LLC'S MOTION TO INTERVENE

SMT TX Management II LLC ("SMT TX Management II") moves to intervene in the

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above-styled proceeding pursuant to 16 Tex. Admin. Code §§ 22.101, 22.103(b), and 22.104. SMT

TX Management II would show as follows:

 The names, address, and telephone number of SMT TX Management II's authorized representatives are:

> John Switzer David Spotts SMT TX Management II LLC 334 Arapahoe Ave. Boulder, CO 80302 Phone: (561) 866-8234 John@smtenergy.com David@smtenergy.com

Chris Reeder Robert Dakota Parish HUSCH BLACKWELL, LLP 111 Congress Avenue, Suite 1400 Austin, Texas 78701 Phone: (512) 370-3318 Fax: (512) 479-1101 chris.reeder@huschblackwell.com dakota.parish@huschblackwell.com

All pleadings and other documents should be served upon SMT TX Management II's authorized representatives.

2. On March 6, 2024, CenterPoint Energy Houston Electric, LLC ("**CenterPoint**") filed an application for authority to change rates. CenterPoint's application includes a request for approval of a tariff for wholesale transmission service at distribution voltage level for distributed energy storage resources ("Tariff").

3. SMT TX Management II is the managing entity for five development stage 9.95 MW battery energy storage resources located within the CenterPoint service territory. These projects are currently in the interconnection process with CenterPoint. Those projects include: (1) Houston V, (2) Houston VII, (3) Houston XIII, (4) Houston XIV, and (5) Waller. These distributed resources will be within the scope of the proposed Tariff. SMT TX Management II, as managing entity for these projects, is therefore directly affected by the application filed, and any decisions made, in this docket.

4. For the above stated reasons, SMT TX Management II respectfully requests that the Commission grant this Motion to Intervene and admit SMT TX Management II as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

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Respectfully submitted,

John Switzer David Spotts SMT TX Management II LLC 334 Arapahoe Ave. Boulder, CO 80302 Phone: (561) 866-8234 John@smtenergy.com David@smtenergy.com

By:

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ATTORNEYS FOR: SMT TX MANAGEMENT II LLC

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on the 19th day of April 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.

Flort Parish

Robert Dakota Parish