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PUC DOCKET NO. 56211

APPLICATION OF	§	BEFORE THE
CENTERPOINT ENERGY	§	
HOUSTON ELECTRIC, LLC	§	PUBLIC UTILITY COMMISSION
FOR AUTHORITY TO CHANGE	§	OF TEXAS
RATES	§	

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 66
MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW, International Brotherhood of Electrical Workers Local 66 (IBEW Local 66 or Movant) under 16 Texas Administrative Code (TAC) §§ 22.103 and 22.104, timely files this Motion to Intervene in the above-referenced proceeding and in support thereof respectfully shows:

I. IDENTITY OF INTERVENOR

International Brotherhood of Electrical Workers Local 66
Edward Allen
Business Manager/Financial Secretary
4345 Allen Genoa
Pasadena, Texas 77504

II. LEGAL REPRESENTATIVE

The name, mailing address, telephone number, and email address of the Movant's legal representative is:

Bradford W. Bayliff
Bayliff Law Firm PLLC
420 Crosswind Drive
Blanco, Texas 78606
(512) 225-0027 Telephone
(512) 480-9200 Facsimile
Brad@Bayliff.law

Movant requests that all pleadings, orders, correspondence, and filings be served on its legal representative.

III. BASIS FOR INTERVENTION

IBEW Local 66 is a labor organization that is an affiliate of the International Brotherhood of Electrical Workers. The applicant, CenterPoint Energy Houston Electric, LLC (CenterPoint Energy), operates under a collective bargaining agreement with IBEW Local 66. IBEW Local 66 represents CenterPoint Energy CenterPoint Energy employees on matters relating to their health, safety, and welfare and quality of electric service. The IBEW Local 66 members CenterPoint Energy employs perform various construction, operation, and maintenance work for CenterPoint Energy. Many members of IBEW Local 66 and their families also are ratepayers living within CenterPoint Energy's service territory.

IBEW Local 66 members may be affected by CenterPoint's application for authority to change rates. IBEW Local 66 is concerned about the issues in this proceeding related to its representation of its members who are CenterPoint Energy's employees.

IBEW Local 66 and its members have justiciable interests that may be adversely affected by the outcome of this proceeding and, on that basis, it seeks to intervene. Movant's interests are factually and legally distinct from any other party and no other party can adequately represent its interests.

IV. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, IBEW Local 66 respectfully requests its Motion to Intervene be granted, IBEW Local 66 be allowed to participate as a party to this proceeding, and for such further relief to which it may be entitled.

Respectfully submitted,

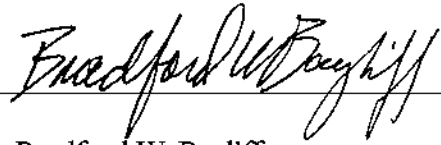
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By: 

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**ATTORNEY FOR
INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS
LOCAL UNION 66**

CERTIFICATE OF SERVICE

A copy of this document is being filed in the Public Utility Commission's Interchange system and served on all parties of record as required by the orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020 in Project No. 50664.



Bradford W. Bayliff