



## **Filing Receipt**

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**Item Number - 42**

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

|                                      |          |                                |
|--------------------------------------|----------|--------------------------------|
| <b>APPLICATION OF CENTERPOINT</b>    | <b>§</b> | <b>BEFORE THE STATE OFFICE</b> |
| <b>ENERGY HOUSTON ELECTRIC, LLC</b>  | <b>§</b> | <b>OF</b>                      |
| <b>FOR AUTHORITY TO CHANGE RATES</b> | <b>§</b> | <b>ADMINISTRATIVE HEARINGS</b> |
|                                      | <b>§</b> |                                |

**ENVIRONMENTAL DEFENSE FUND’S**

**MOTION TO INTERVENE**

Pursuant to §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, Environmental Defense Fund (EDF) respectfully files this Motion to Intervene in the above referenced proceeding, showing as follows:

1. EDF is a 501(c)(3) not-for-profit membership organization that seeks to preserve natural systems upon which life depends, including through advocacy before utility regulatory agencies.

2. EDF has standing to participate in this proceeding as an organization with members located within CenterPoint Houston Electric, LLC’s (“CenterPoint”) service territory, who are customers of CenterPoint and who may be adversely affected by the outcome of this proceeding.

3. EDF has an interest in this proceeding as a not-for-profit environmental organization working to promote the environmental health and livelihoods of communities, including in Texas, through widespread deployment of zero-emission medium- and heavy-duty transportation infrastructure. EDF advocates in multiple fora for programs and policies that support equitable and efficient charging of electric vehicles.

4. As a party to this proceeding, EDF will contribute to the development of a complete record which respect to electric vehicle charging and make-ready infrastructure, electric grid planning, and other related issues, and EDF’s participation will benefit the public interest.

5. Environmental Defense Fund’s authorized representatives in this matter are:

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For the reasons stated in this Motion to Intervene, EDF has an interest that may be adversely affected by the outcome of this proceeding. In recognition of this, EDF respectfully requests that the Commission, CenterPoint, and all interested parties take notice of this Motion to Intervene and serve EDF with copies of all documents filed in this docket and that EDF be permitted to participate fully as a party in this proceeding.

Dated: March 18<sup>th</sup>, 2024

Respectfully submitted,

/s/ Casey Horan

Casey Horan

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**ATTORNEYS FOR  
ENVIRONMENTAL DEFENSE  
FUND**

**CERTIFICATE OF SERVICE**  
SOAH DOCKET NO. 473-24-13232  
PUC DOCKET NO. 56211

I certify that today, March 18<sup>th</sup>, 2024, a true copy of the Environmental Defense Fund's Motion to Intervene was served on all parties of record via hand delivery, facsimile, United States First-Class Mail, or electronic mail.

/s/ Casey Horan

Casey Horan