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**SOAH DOCKET NO. 473-24-17664
P.U.C. DOCKET NO. 56572**

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY FOR	§	
APPROVAL TO REVISE ITS	§	OF
ENERGY EFFICIENCY COST	§	
RECOVERY FACTOR	§	ADMINISTRATIVE HEARINGS

**JOINT MOTION TO GRANT INTERVENTIONS, APPROVE NOTICE, ADMIT
EVIDENCE AND REMAND TO THE COMMISSION**

El Paso Electric Company (EPE), Texas Industrial Energy Consumers, the Staff (Staff) of the Public Utility Commission of Texas (Commission) and the City of El Paso, (collectively, the Parties) submit this Joint Motion.

I. Motion to Grant Interventions

The Texas Industrial Energy Consumers moved to intervene on May 3, 2024, and the City of El Paso moved to intervene in this proceeding on May 14, 2024. No party has objected to the interventions, but as of this date, no ruling on the pending motions has been made. The Parties therefore request that an order be entered granting the pending motions to intervene.

II. Approval of Notice

Order No. 1 in this proceeding required the Commission Staff to file comments on the sufficiency of EPE’s notice by May 17, 2024. Staff filed a recommendation on May 16, 2024, that EPE’s notice be found to comply with 16 Tex. Admin. Code § 25.182(d)(13)-(14). The parties therefore request that an order be entered finding EPE’s notice to be sufficient.

III. Admission of Evidence

As evidenced by the concurrently filed Stipulation and Settlement Agreement (Agreement) with its accompanying Proposed Order, there are no remaining disputed issues, and no hearing is required in this proceeding. In support of that Agreement, the parties to the Agreement request the following evidence be admitted into the record:

- a. El Paso Electric’s application filed on May 1, 2024, including the direct testimonies with attachments and workpapers of Mr. Reyes and Mr. Silva and the affidavit of Bret J. Slocum;
- b. El Paso Electric’s affidavit of proof of notice, filed on May 10, 2024;
- c. the direct testimony of Rene Gonzalez filed on May 30, 2024;

- d. El Paso Electric's first errata filed on June 12, 2024;
- e. El Paso Electric second errata filed on August 5, 2024;
- f. the testimony with attachments of Mr. Nalepa, including the declarations of Mr. Nalepa and Mr. Gordon filed on August 9, 2024;
- g. testimony of Staff witnesses Ethan Blanchard, Sandra Hale and Tsungirirai Gotorra filed on August 16, 2024;
- h. the agreement and attachments filed on November 14, 2024, 2024; and
- i. Staff testimony of Tsungirirai Gotorra in support of the Agreement filed on November 14, 2024.

IV. Request for Remand to Commission

In light of the Agreement, which resolves all issues in this proceeding, the Parties to the Agreement request this docket be remanded to the Commission in order to allow the Commission to review and consider the Agreement as soon as possible.

Respectfully submitted,

Rosanna Al-Hakeem
State Bar No. 24097285
Attorney
El Paso Electric Company
P.O. Box 982
El Paso, Texas 79960
Telephone: (915) 521-4664
rosanna.alhakeem@epelectric.com

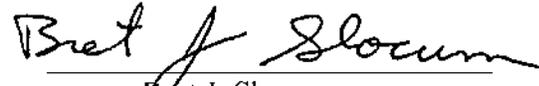
Bret J. Slocum
State Bar No. 18508200
Duggins Wren Mann & Romero, LLP
P.O. Box 1149
Austin, Texas 78767
(512) 744-9300
(512) 744-9399 (fax)
bslocum@dwmrlaw.com


Bret J. Slocum

**ATTORNEY FOR EL PASO
ELECTRIC COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by email on all parties of record in this proceeding on November 14, 2024.


Bret J. Slocum
Bret J. Slocum