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PUC DOCKET NO. 56921

**APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY TO §
AMEND ITS INTERRUPTIBLE CREDIT §
OPTION TARIFF, AND FOR §
APPROVAL OF A SOUTHWEST §
POWER POOL INTEGRATED §
MARKETPLACE DEMAND RESPONSE §
OPTION TARIFF AND AN OFF-PEAK §
ALTERNATE RIDER §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers (“TIEC”), pursuant to the Public Utility Regulatory Act (“PURA”), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission’s Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of TIEC’s authorized representatives are:

Mr. Benjamin B. Hallmark
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All pleadings and other documents should be served upon TIEC’s authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC’s principal purpose is to address electricity matters in proceedings before the Commission.

3. On August 23, 2024, Southwestern Public Service Company (“SPS”) filed an application to amend its interruptible credit option tariff, approval of a Southwest Power Pool integrated marketplace demand response option tariff, and approval of an off-peak alternate rider.

4. Because TIEC member companies own and operate industrial facilities in the SPS service territory and purchase electricity from SPS, TIEC members will be impacted by any determinations the Commission may make regarding SPS's application.

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

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Benjamin B. Hallmark

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, James Z. Zhu, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 17th day of September, 2024 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s/ James Z. Zhu

James Z. Zhu