



## **Filing Receipt**

**Filing Date - 2024-08-26 02:30:31 PM**

**Control Number - 56963**

**Item Number - 8**

**PUC DOCKET NO. 56963**

<b>APPLICATION OF ONCOR ELECTRIC</b>	<b>§</b>	
<b>DELIVERY COMPANY LLC TO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>AMEND ITS DISTRIBUTION COST</b>	<b>§</b>	<b>OF TEXAS</b>
<b>RECOVERY FACTOR</b>	<b>§</b>	

**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:

Michael A. McMillin  
John R. Hubbard  
O'Melveny & Myers LLP  
303 Colorado St., Suite 2750  
Austin, TX 78701  
(737) 261-8600  
[mmcmillin@omm.com](mailto:mmcmillin@omm.com)  
[jhubbard@omm.com](mailto:jhubbard@omm.com)  
[ommeservice@omm.com](mailto:ommeservice@omm.com)

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 16, 2024, Oncor Electric Delivery Company LLC ("Oncor") filed an application to amend its distribution cost recovery factor ("DCRF").

4. TIEC member companies own and operate industrial facilities within the Oncor region. Therefore, TIEC members will be impacted by any determination the Commission may make regarding Oncor's application. Accordingly, TIEC has a justiciable interest in this proceeding and should be granted intervenor status.

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/ Michael A. McMillin

Michael A. McMillin

State Bar No. 24088034

John R. Hubbard

State Bar No. 24120909

303 Colorado St., Suite 2750

Austin, TX 78701

(737) 261-8600

[mmcmillin@omm.com](mailto:mmcmillin@omm.com)

[jhubbard@omm.com](mailto:jhubbard@omm.com)

[OMMeservice@omm.com](mailto:OMMeservice@omm.com)

**ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS**

**CERTIFICATE OF SERVICE**

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 26<sup>th</sup> day of August, 2024 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard