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PUC DOCKET NO. 57172

COMMISSION STAFF'S PETITION TO	§	BEFORE THE
ESTABLISH A SECONARY CAP ON	§	
PERFORMANCE BONUSES UNDER 16	§	PUBLIC UTILITY COMMISSION
TAC § 25.182(e) FOR THE 2024	§	
PROGRAM YEAR	§	OF TEXAS

**CITY OF EL PASO'S
MOTION TO INTERVENE**

Comes now the City of El Paso (the "City") and files this Motion to Intervene in the above styled and numbered docket and as grounds for said intervention would respectfully show the Commission as follows:

1. The City is a duly incorporated home rule city served by El Paso Electric Company and is a regulatory authority having original jurisdiction over electric rates and service by El Paso Electric Company. The Mayor of the City is Oscar Leaser whose office address is 300 N. Campbell, El Paso, Texas 79901. The attorneys for the City are Karla Nieman, City Attorney and Matthew G. Marquez, Assistant City Attorney, 300 N. Campbell, 2nd Floor, El Paso, Texas 79901, 915-212-0033, fax 915-212-0034; Donald C. Davie, ScottHulse P.C., One San Jacinto Plaza, 201 E. Main Drive, Suite 1100, El Paso, Texas 79901, (915) 533-2493; fax (915) 546-8333; and Norman J. Gordon, Attorney, P.O. Box 8, El Paso, Texas 79940, 915-203-4883.

2. The City files this Motion pursuant to the Commission's Procedural Rules on behalf of its citizens, as an affected person and as municipality regarding a utility serving within its corporate limits. The City is entitled to intervene pursuant to TEX. UTIL. CODE ANN. 33.025.

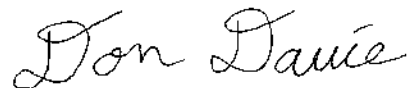
The City prays that this Motion to Intervene be granted and that it be given full rights of a party including the right to appear at all proceedings involving this docket, conduct discovery, present evidence, cross-examine witnesses and present legal arguments.

Respectfully submitted,

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By: _____
Donald C. Davie

Certificate of Service

I certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding on this 22ND day of October 2024 by facsimile, electronic mail, and/or first class, U.S. Mail.

Don Davie

Donald C. Davie