

Filing Receipt

Filing Date - 2024-11-19 12:53:43 PM

Control Number - 57271

Item Number - 7

PUC DOCKET NO. 57271

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR DETERMINATION OF SYSTEM RESTORATION COSTS

PUBLIC UTILITY COMMISSION OF TEXAS

HOUSTON COALITION OF CITIES' MOTION TO INTERVENE

Pursuant to the Public Utility Regulatory Act Utilities Code ("PURA") §§ 33.025, 36.401-36.406 and Public Utilities Commission Procedural Rules 22.103 and 22.104, the Houston Coalition of Cities files this Motion to Intervene as a party in the above-captioned proceeding and in support thereof would respectfully show as follows:

I. Authorized Representative

1. The name, address, and telephone numbers of the persons designated to represent the Houston Coalition of Cities are:

Alton J. Hall Anam Fazli Steven T. Moritz ADAMS AND REESE LLP LyondellBasell Tower 1221 McKinney St., Suite 4400 Houston, Texas 77010 (713) 308-0106 (713) 308-4032 (Fax) <u>Alton.Hall@arlaw.com</u> <u>Anam.Fazli@arlaw.com</u> Steven.Moritz@arlaw.com

2. The Houston Coalition of Cities hereby requests the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon Houston Coalition of Cities' designated representative(s).

II. Standing to Intervene

3. As a municipality within whose corporate limits CenterPoint Energy Houston Electric LLC provides service the Houston Coalition of Cities has standing to intervene as a party under Section 33.025 of PURA and the Commission's Procedural Rules 22.103 and 22.104.

4. The commission has jurisdiction over the parties and subject matter of the intervention pursuant to Chapter 36 of PURA.

III. Request to Intervene

WHEREFORE PREMISES CONSIDERED, the Houston Coalition of Cities respectfully

requests the Commission grant the Houston Coalition of Cities' Motion to Intervene.

Respectfully submitted, Arturo G. Michel City Attorney

YuShan Chang State Bar No. 24040670 Senior Assistant City Attorney 900 Bagby, 4th Floor Houston, Texas 77002 (832) 393-6442 (832) 393-6259 Facsimile yushan.chang@houstontx.gov

City of Houston

-and-

Alton J. Hall, Jr. State Bar No.: 08743740 Anam Fazli State Bar No.: 24108599 Steven T. Moritz State Bar No.: 24138686 ADAMS AND REESE LLP LyondellBasell Tower 1221 McKinney St., Suite 4400 Mission, Texas 77010 (713) 308-0106 (713) 308-0106 (713) 308-4032 (Fax) Alton.Hall@arlaw.com <u>Anam.Fazli@arlaw.com</u> Steven.Moritz@arlaw.com

By: <u>/s/ Alton J. Hall, Jr.</u> Alton J. Hall, Jr.

Counsel for Houston Coalition of Cities

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November 2024, a true and correct copy of the foregoing document was served upon on all parties of record by email, facsimile and/or First Class Mail.

/s/ Alton J. Hall, Jr. Alton J. Hall, Jr.