



## **Filing Receipt**

**Filing Date - 2025-01-08 03:30:30 PM**

**Control Number - 57501**

**Item Number - 5**

**PUC DOCKET NO. 57501**

<b>APPLICATION OF EL PASO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ELECTRIC COMPANY TO AMEND</b>	<b>§</b>	
<b>ITS CERTIFICATE OF</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CONVENIENCE AND NECESSITY</b>	<b>§</b>	
<b>FOR A 100 MW SOLAR/100 MW</b>	<b>§</b>	
<b>BATTERY STORAGE FACILITY</b>	<b>§</b>	

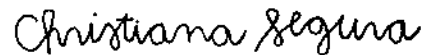
**OFFICE OF PUBLIC UTILITY COUNSEL'S  
MOTION TO INTERVENE**

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a)(3)(A)-(B), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of the residential and small commercial consumers in El Paso Electric Company's ("EPE") service territory. OPUC's Chief Executive and Public Counsel has determined that residential and small commercial consumers in EPE's service territory are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute.

Date: January 8, 2025

Respectfully submitted,

Benjamin Barkley  
Chief Executive and Public Counsel  
State Bar No. 2409208



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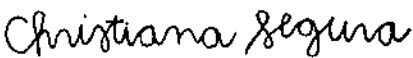
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**ATTORNEYS FOR THE  
OFFICE OF PUBLIC UTILITY COUNSEL**

**CERTIFICATE OF SERVICE**  
PUC DOCKET NO. 57501

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 8<sup>th</sup> day of January 2025 by facsimile, electronic mail, and/or first class, U.S. Mail.

  
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Christiana Segura