

## **Filing Receipt**

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#### PUC DOCKET NO. 57579

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR APPROVAL OF ITS 2026-2028 TRANSMISSION AND DISTRIBUTION SYSTEM RESILIENCY PLAN

PUBLIC UTILITY COMMISSION OF TEXAS

### HOUSTON COALITION OF CITIES' MOTION TO INTERVENE

Pursuant to 16 Texas Administrative Code 22.103(b) and 22.104, the Houston Coalition of

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Cities<sup>1</sup> 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 the Houston Coalition of Cities' designated representative(s).

<sup>&</sup>lt;sup>1</sup> At the time of this filing, the Houston Coalition of Cities includes the City of Houston, Wes University, La Porte, and Bellaire. The Houston Coalition of Cities will file an amended or supplemental filing on behalf of the complete list of parties made a part of the Houston Coalition of Cities.

#### **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 Public Utility Regulatory Act, V.T.C.A Utilities Code 33.025 (Vernon 1998) ("PURA") and 16 Texas Administrative Code 22.103(b), 22.104, and 25.62.

4. The Commission has jurisdiction over the parties and subject matter of the intervention pursuant to 16 Texas Administration Code 25.62 and PURA § 38.078.

#### **III. Request to Intervene**

WHEREFORE PREMISES CONSIDERED, Houston Coalition of Cities respectfully

requests the Commission grant 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

-and-

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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 4th day of February 2025, 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.

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