



## **Filing Receipt**

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

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**BEFORE THE STATE OFFICE  
  
OF  
  
ADMINISTRATIVE HEARINGS**

**HUNT ENERGY NETWORK LLC’S MOTION TO INTERVENE**

Hunt Energy Network, L.L.C. (“HEN”) moves to intervene in the above styled proceeding pursuant to 16 Texas Administrative Code (“TAC”) §§ 22.101, 22.103(b), and 22.104. HEN shows as follows:

1. The name, address, and telephone number of HEN’s authorized representatives are:

Marty Hopkins  
State Bar No. 24059970  
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All pleadings and other documents should be served upon HEN’s authorized representatives.

2. On January 31, 2025, CenterPoint Energy Houston Electric, LLC (“CenterPoint”) filed its application for approval of its 2026-2028 Transmission and Distribution System Resiliency Plan (“System Resiliency Plan”) pursuant to Public Utility Regulatory Act (“PURA”) § 38.078 and 16 TAC Code § 25.62 (the “Application”). In its Application, CenterPoint requests the Public Utility Commission of Texas (“Commission”) approve a utility-scale microgrid pilot program and associated study, design, implementation, and operation costs.

3. HEN currently has 29 Distribution Energy Storage Resource (“DESR”) facilities in operation in the Electric Reliability Council of Texas (“ERCOT”) region and is continuing its development of DESRs in ERCOT. HEN has requested screening studies from CenterPoint in the past and continues to evaluate locations within the CenterPoint service area to install DESR facilities that will be required to pay charges to CenterPoint under the Wholesale Distribution Service tariff pending approval in Docket No. 56211. HEN is also evaluating microgrids in combination with its DESR facilities. CenterPoint’s proposed Microgrid Pilot Project may impact HEN’s development of DESR facilities in CenterPoint’s service territory. Thus, HEN may be adversely affected by decisions made in this proceeding.

4. HEN has a justiciable interest in the outcome of this proceeding and therefore requests to intervene as a directly affected party.

For the above stated reasons, HEN respectfully requests that the Commission grant this Motion to Intervene and admit HEN as an intervenor in this proceeding, and for such other relief to which it may be justly entitled.

Respectfully Submitted,

By */s/ Marty Hopkins*

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**ATTORNEY FOR HUNT ENERGY  
NETWORK, L.L.C**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document has been forwarded to all parties of record in this proceeding via electronic mail on this 18<sup>th</sup> day of February, 2025, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/Melvina Rhetta-Fair