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PUC DOCKET NO. 57579

APPLICATION OF	§	
CENTERPOINT ENERGY	§	BEFORE THE
HOUSTON ELECTRIC LLC FOR	§	
APPROVAL OF ITS 2026-2028	§	PUBLIC UTILITY COMMISSION
TRANSMISSION AND	§	
DISTRIBUTION SYSTEM	§	OF TEXAS
RESILIENCY PLAN	§	

MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW, International Brotherhood of Electrical Workers Local Union 66 (IBEW LU 66 or Movant), under P.U.C. PROC. R. §§22.103 and 22.104 and PUC Order No. 1, to timely file this Motion to Intervene in the above-referenced proceeding and in support thereof respectfully shows:

I. IDENTITY OF INTERVENOR

International Brotherhood of Electrical Workers Local 66
Edward Allen
Business Manager/Financial Secretary
4345 Allen Genoa
Pasadena, Texas 77504

II. LEGAL REPRESENTATIVE

The name, mailing address, telephone number, and email address of the Movant's legal representative is:

Bradford W. Bayliff
Bayliff Law Firm PLLC
420 Crosswind Drive
Blanco, Texas 78606
(512) 225-0027 Telephone
Brad@Bayliff.law

Movant requests all pleadings, orders, correspondence, and filings be served on its legal representative.

III. BASIS FOR INTERVENTION

IBEW Local 66 is a labor organization that is an affiliate of the International Brotherhood of Electrical Workers. The applicant, CenterPoint Energy Houston Electric, LLC (CenterPoint Energy), operates under a collective bargaining agreement with IBEW Local 66. IBEW Local 66 represents CenterPoint Energy employees and subcontractors' employees on matters relating to their health, safety, and welfare and quality of electric service. The IBEW Local 66 members CenterPoint Energy employs perform various construction, operation, and maintenance work for CenterPoint Energy. Many members of IBEW Local 66 and their families also are ratepayers living within CenterPoint Energy's service territory.

IBEW Local 66 members may be affected by CenterPoint's application for approval of its transmission and distribution resiliency plan. IBEW Local 66 is concerned about the issues in this proceeding related to its representation of its members who are CenterPoint Energy's employees.

IBEW Local 66 and its members have justiciable interests that may be adversely affected by the outcome of this proceeding and, on that basis, it seeks to intervene. Movant's interests are factually and legally distinct from any other party and no other party can adequately represent its interests.

IV. ACKNOWLEDGEMENTS

IBEW Local Union 66 acknowledges that: (1) it will be a party to the case; (2) it will have to respond to all discovery requests from other parties in the case; (3) if Movant files testimony, other parties may cross-examine at a hearing any IBEW LU 66 witness(es) providing testimony in this case; (4) if IBEW LU 66 files any documents, copies of those documents must be provided to every other party to this case under the rules of the Public Utility Commission of Texas and orders of the Administrative Law Judge; and (5) IBEW LU 66 is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

V. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, IBEW LU 66 respectfully requests this Motion to Intervene be granted, IBEW LU 66 be allowed to participate as a party to this proceeding, and for such further relief to which it may be entitled.

Respectfully submitted,

BAYLIFF LAW FIRM PLLC
420 Crosswind Drive
Blanco, Texas 78606

By: 

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Attorney for
IBEW LOCAL UNION 66

CERTIFICATE OF SERVICE

A copy of this document is being filed in the Public Utility Commission's Interchange system and served on all parties of record as required by the orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020 in Project No. 50664.

/s/ Bradford W. Bayliff