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APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR AUTHORITY TO REVISE ITS FUEL FACTOR FORMULA AND RELATED RELIEF PUBLIC UTILITY COMMISSION

OF TEXAS

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 Southwestern Public Service Company's ("SPS") service territory. OPUC's Chief Executive and Public Counsel has determined that residential and small commercial consumers in SPS'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: April 3, 2025

Respectfully submitted,

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

Christiana Segura

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ATTORNEYS FOR THE OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE PUC DOCKET NO. 57791

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 3rd day of April 2025 by facsimile, electronic mail, and/or first class, U.S. Mail.

Christiana Segura

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