

Filing Receipt

Filed Date - 2025-05-09 02:55:10 PM

Control Number - 58017

Item Number - 14

SOAH DOCKET NO. 473-25-18477 PUC DOCKET NO. 58017

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR

are:

BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

\$ \$ \$ \$

Texas Industrial Energy Consumers ("TIEC"), pursuant to the Public Utility Regulatory Act ("PURA"), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, files this Motion to Intervene in the abovereferenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of TIEC's authorized representatives

Mr. Benjamin B. Hallmark Mr. James Z. Zhu O'Melveny & Myers LLP 500 West 2nd St., Suite 1900 Austin, TX 78701 (737) 261-8600 <u>bhallmark@omm.com</u> <u>jzhu@omm.com</u> OMMeservice@omm.com

All pleadings and other documents should be served upon TIEC's authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to address electricity matters in proceedings before the Commission.

3. On May 1, 2025, Southwestern Public Service Company ("SPS") filed an filed an application to adjust its energy-efficiency cost recovery factor ("EECRF").

4. Because TIEC member companies own and operate industrial facilities in the SPS service territory and purchase electricity from SPS, TIEC members will be impacted by any determinations the Commission may make regarding SPS's application.

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

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Benjamin B. Hallmark Benjamin B. Hallmark State Bar No. 24069865 James Z. Zhu State Bar No. 24102683 500 West 2nd St., Suite 1900 Austin, Texas 78701 (737) 261-8600 bhallmark@omm.com jzhu@omm.com ommeservice@omm.com

ATTORNEYS FOR TEXAS INDUSTRIAL ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, James Z. Zhu, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 9th day of May, 2025 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s∕ .James Z. Zhu James Z. Zhu