



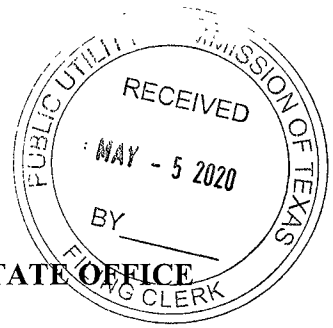
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SOAH DOCKET NO. 473-20-3568  
PUC DOCKET NO. 50804



APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
PUBLIC SERVICE COMPANY TO §  
ADJUST ITS ENERGY EFFICIENCY § OF  
COST RECOVERY FACTOR § 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 above-referenced proceeding, respectfully showing as follows:

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

Mr. Rex D. VanMiddlesworth  
Mr. Benjamin B. Hallmark  
Mr. James Z. Zhu  
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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, 2020, Southwestern Public Service Company ("SPS") 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.

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,

THOMPSON & KNIGHT LLP

/s/ James Z. Zhu

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**ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS**

#### **CERTIFICATE OF SERVICE**

I, James Z. Zhu, Attorney for TIEC, hereby certify that a copy of TIEC's Motion to Intervene was served on all parties of record in this proceeding on this 5<sup>th</sup> day of May, 2020 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s/ James Z. Zhu

James Z. Zhu