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**PUC DOCKET NO. 50685**

**APPLICATION OF EL PASO  
ELECTRIC COMPANY FOR  
APPROVAL OF ACCOUNTING  
TREATMENT FOR TEMPORARY  
REASSIGNMENT OF  
JURISDICTIONAL ENERGY**

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**PUBLIC UTILITY COMMISSION**

**OF TEXAS**

**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. TIEC members for this case include Marathon Petroleum Corporation.

3. On March 18, 2020, El Paso Electric Company ("EPE") filed an application for approval to temporarily account for the Macho Springs Purchased Power Agreement (PPA).

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