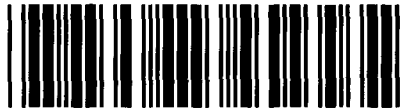




Control Number: 50685



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Addendum StartPage: 0

**DOCKET NO. 50685**

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

§  
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§  
§  
§  
§

**BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS**



**CITY OF EL PASO'S MOTION TO INTERVENE**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Comes now the City of El Paso (the "City") and files this Motion to Intervene in the above styled and numbered docket and as grounds for said intervention would respectfully show the Commission as follows:

1. The City is a duly incorporated home rule city served by El Paso Electric Company and is a regulatory authority having original jurisdiction over electric rates and service by El Paso Electric Company. The Mayor of the City is Dee Margo whose office address is 300 N. Campbell, El Paso, Texas 79901. The attorneys for the City are Karla Nieman, City Attorney, Josette Flores, Senior Assistant City Attorney, Abbie Mullin, Assistant City Attorney, and Russell Abeln, Assistant City Attorney, 300 N Campbell, El Paso, Texas 79901, 915-212-0033, fax, 915-212-0034.
2. The City files this Motion pursuant to the Commission's Procedural Rules on behalf of its citizens, as an affected person and as a municipality regarding a utility serving within its corporate limits. The City is entitled to intervene pursuant to Tex. Util. Code Ann. § 33.025 (West).

The City prays that this Motion to Intervene be granted and that it be given full rights of a party, including the right to appear at any and all proceedings involving this docket, conduct discovery, present evidence, cross-examine witnesses and present legal arguments.

Respectfully submitted,

**Norman J. Gordon**  
State Bar No. 08203700  
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By: \_\_\_\_\_  
**Norman J. Gordon**

**KARLA M. NIEMAN, City Attorney**  
Texas State Bar No. 24048542  
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Tel: (915) 212-0033  
Fax: (915) 212-0034

By: \_\_\_\_\_  
**Abbie Mullin**  
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By: *Russell Abeln*  
**Russell Abeln**  
Assistant City Attorney  
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Attorneys for Intervener  
City of El Paso

## **CERTIFICATE OF SERVICE**

I, Russell Abeln, Attorney for the City of El Paso, certify that on May 1, 2020, a true and correct copy of the foregoing document was served electronically or mail on:

### **EL PASO ELECTRIC COMPANY**

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*Russell Abeln*

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Russell Abeln

**DOCKET NO. 50685**

<b>APPLICATION OF EL PASO</b>	<b>§</b>	<b>BEFORE THE</b>
<b>ELECTRIC COMPANY FOR</b>	<b>§</b>	
<b>APPROVAL OF ACCOUNTING</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>TREATMENT TO ALLOW</b>	<b>§</b>	
<b>TEMPORARY REASSIGNMENT OF</b>	<b>§</b>	<b>OF TEXAS</b>
<b>JURISDICTIONAL ENERGY</b>	<b>§</b>	

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