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PUC DOCKET NO. 50790



JOINT REPORT AND APPLICATION §
OF ENTERGY TEXAS, INC. AND §
EAST TEXAS ELECTRIC §
COOPERATIVE, INC. FOR §
REGULATORY APPROVALS §
RELATED TO TRANSFERS OF THE §
HARDIN COUNTY PEAKING §
FACILITY AND A PARTIAL §
INTEREST IN MONTGOMERY §
COUNTY POWER STATION §

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.

3. On April 28, 2020, Entergy Texas, Inc. ("ETI") and East Texas Electric Cooperative, Inc. ("ETEC") filed a joint report and application for transfer of facilities, transfer of

rights under and of amendment to certificates of convenience and necessity (“CCN”), and for other regulatory approvals.

4. Because TIEC member companies own and operate industrial facilities in the ETI service territory and purchase electricity from ETI, TIEC members will be impacted by any determinations the Commission may make regarding this 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/ Benjamin B. Hallmark

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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 8th day of May, 2020 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s/ James Z. Zhu

James Z. Zhu