



Control Number: 50731



Item Number: 42

Addendum StartPage: 0



**SOAH DOCKET NO. 473-20-3299
PUC DOCKET NO. 50731**

APPLICATION OF TEXAS-NEW MEXICO POWER COMPANY FOR A DISTRIBUTION COST RECOVERY FACTOR	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
--	------------------	---

**CITIES SERVED BY
TEXAS-NEW MEXICO POWER COMPANY'S
SUPPLEMENTAL MOTION TO INTERVENE**

COME NOW, the Cities Served by Texas-New Mexico Power Company (Cities) and file this Supplemental Motion to Intervene. The cities of Alvin, Coppell, Dickinson, Friendswood, La Marque, Lewisville, and Texas City have previously been granted intervention in this proceeding. The cities of Blue Ridge, Emory, Farmersville, and Fort Stockton now request to intervene in this proceeding to join the previously approved intervening parties in Cities. In support of its Motion, Cities show as follows:

1. Cities are municipalities located within the service territory of Texas-New Mexico Power Company (TNMP).
2. On April 6, 2020, TNMP filed an Application for Approval of a Distribution Cost Recovery Factor. Cities as well as their residents and businesses may be adversely impacted by the relief requested by TNMP. Therefore, Cities have a justiciable interest in this proceeding.
3. On April 9, 2020, Cities¹ filed its Motion to Intervene in this proceeding.
4. Cities' Motion to Intervene was granted at the Prehearing Conference held on April 20, 2020, and was memorialized in SOAH Order No. 2.
5. Cities expect other municipalities to intervene and seek consolidation with Cities served by Texas-New Mexico Power Company.

WHEREFORE PREMISES CONSIDERED, Cities request that the Commission, TNMP, and all other interested parties take notice of this Supplemental Motion to Intervene and that the

¹ On the date of Cities' first Motion to Intervene, April 9, 2020, Cities consisted of Alvin, Coppell, Dickinson, Friendswood, La Marque, Lewisville, and Texas City.

42

cities of Blue Ridge, Emory, Farmersville, and Fort Stockton be permitted to participate fully as parties to this proceeding.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

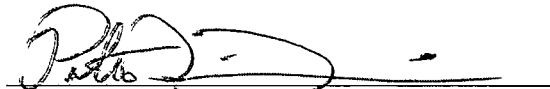
Austin, Texas 78701

(512) 322-5800

(512) 472-0532 (Fax)

cbrewster@lglawfirm.cim

pdinnin@lglawfirm.com



CHRISTOPHER L. BREWSTER

State Bar No. 24043570


W. PATRICK DINNIN

State Bar No. 24097603

ATTORNEYS FOR CITIES SERVED BY
TEXAS-NEW MEXICO POWER COMPANY

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on May 21, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.



W. PATRICK DINNIN