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APPLICATION OF ENTERGY TEXAS, §  
INC. TO MODIFY SCHEDULE LQF §  
AND METHODOLOGY FOR §  
CALCULATING AVOIDED COST §  
UNDER SCHEDULE SMS §

BEFORE THE  
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 name, address, and telephone number of the movant is:

Texas Industrial Energy Consumers  
Air Liquide America L.P.  
c/o Bill Smith  
P.O. Box 460229  
Houston, TX 77056-8229  
(713) 624-8344  
(713) 624-8350 Fax

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

Mr. Rex D. VanMiddlesworth  
Ms. Meghan Griffiths  
Mr. James Nortey  
Andrews Kurth LLP  
111 Congress Avenue, Suite 1700  
Austin, Texas 78701  
(512) 320-9200  
(512) 320-9292 Fax

All pleadings and other documents should be served upon TIEC's authorized representatives.

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3. 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 participating in this case include Air Liquide America L.P. A complete list of all TIEC members participating in this docket will be provided.


4. On April 30, 2013, Entergy Texas, Inc. (ETI), filed an application to modify the current methodology for calculating avoided cost, to modify its Schedule LQF—Nonfirm Energy Purchased from Large Qualifying Facilities (Schedule LQF), and to make corresponding revisions to billings under Schedule SMS—Standby and Maintenance Service (Schedule SMS).

5. 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 ETI'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,

ANDREWS KURTH LLP

  
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ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS

**CERTIFICATE OF SERVICE**

I, James Nortey, 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 10th day of May, 2013 by hand-delivery, facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

  
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James Nortey