

APR 25 2016

UNITED STATES OF AMERICA **Electricity Delivery and Energy Reliability**
BEFORE THE DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY

Tenaska Energía de Mexico,
S. de R.L. de C.V.

Docket No. EA-417

PUBLIC UTILITY COMMISSION OF TEXAS'S
MOTION TO INTERVENE OUT OF TIME

Pursuant to Rules 210(b) and 214(a)(2) of the Federal Energy Regulatory Commission's (FERC) Rules of Practice and Procedure, 18 C.F.R. §§ 385.210(b) & 385.214(a)(2), the Public Utility Commission of Texas (PUC), through the Office of the Attorney General of Texas, respectfully files its motion to intervene out of time in the above proceedings. In requesting to intervene, the PUC understands that should it be granted status as intervenor, it must accept and be bound by the record of this matter as it exists at this time.

1. **Name and representatives.** Movant's name is the Public Utility Commission of Texas. The representatives of the PUC to whom communications concerning this proceeding should be addressed are:

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2. **Nature of proceedings.** On March 10, 2016, Tenaska Energía de Mexico, S. de R.L. de C.V. (TEM) filed an application for authorization to transmit electric energy from the United States to Mexico under section 202(e) of the Federal Power Act. The application requests authorization from the Department of Energy (the Department) to export power to Mexico over any authorized international transmission facility appropriate for open access transmission by third parties under export limits authorized by the Department.

3. **Basis for intervention.** The PUCT is a “State Commission” as defined in 18 C.F.R. § 1.101(k) and may be a party to this proceeding under FERC Rule 214(a)(2). The PUCT has a direct, material interest in the outcome of this proceeding as a regulator of electric utilities and providers in Texas that no other party can adequately represent.

Inasmuch as the proceeding is in a very early stage and the PUCT agrees to accept the record as it presently exists, no disruption to the proceedings and no prejudice to, or additional burdens upon, the existing parties will result from permitting this motion to intervene.

4. **Position.** As a state regulatory commission, the PUCT seeks to monitor the request to insure no adverse impact on electric service within Texas.

PRAYER

The PUCT respectfully requests that it be permitted to intervene out of time and that the PUCT be included on the official service list in the above proceedings.

Respectfully submitted,

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Attorney General of Texas

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First Assistant Attorney General

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ATTORNEYS FOR THE
PUBLIC UTILITY COMMISSION
OF TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the secretary in this proceeding.

Dated at this 25th Day of April 2016.

/s/ Kellie E. Billings-Ray
KELLIE E. BILLINGS-RAY