

AUSTIN ENERGY'S TARIFF PACKAGE: §
2015 COST OF SERVICE STUDY §
AND PROPOSAL TO CHANGE BASE § BEFORE THE CITY OF AUSTIN
ELECTRIC RATES § IMPARTIAL HEARING EXAMINER

CROWN CASTLE'S MOTION TO INTERVENE

This Motion to Intervene ("Motion") is being filed by Crown Castle (the "Party"). The Party is an Austin Energy customer or is an association which represents Austin Energy customers and is entitled to be an intervenor in this proceeding.

The Party has reviewed Austin Energy's Tariff Package and believes that the Impartial Hearing Examiner should address the following issues:

- (1) Austin Energy is placing an undue burden on its ratepayers due to its failure to issue a franchise to and enter into a pole attachment agreement with Crown Castle. Austin Energy asserts values of financial stability, reliable electric service, community priorities, and customer value. Each of these core tenets is jeopardized by its decision to consistently deny Crown Castle the ability to build and maintain a broadband telecommunications network in Austin. The inaction on the part of the city and Austin Energy fails to access a readily available miscellaneous revenue stream to reduce the cost of service across all rate classes without burdening the ratepayers. Further, by delaying the development and installation of this network, they are denying ratepayers enhanced access to critical services that can have an immediate impact on the quality of life for Austinites.
- (2) Austin Energy is effectively and unjustly denying service to Crown Castle. In order to operate the telecommunications network described in item 1 above, Crown Castle's equipment requires power. By consistently denying Crown Castle access rights to build and maintain its network within the public utility right of way in Austin, Austin Energy is also denying service to additional locations requested by an existing utility customer.

All documents related to this proceeding should be emailed to the Party at the following email address: **Maureen.Whitfield@crowncastle.com**.

Kirk Wampler

(Signature of Party or Party's Authorized Representative)

Kirk Wampler VP Network Real Estate

(Printed Name of Party or Party's Authorized Representative)

(State Bar Number if Party or Party's Auth. Rep. is an attorney)

3/2/14

(Date Submitted)