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LA PUBLIC SERVICE
COMMISSION

cc: *Melanie*

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

LOUISIANA PUBLIC SERVICE COMMISSION
EX PARTE

DOCKET NO. R-34003

In re: Proposed Modification to the Commission's Market-Based Mechanism Rules

**Occidental Chemical Corporation's
PETITION OF INTERVENTION**

Occidental Chemical Corporation ("OxyChem"), through undersigned counsel, respectfully petitions to intervene as a party in this proceeding pursuant to Rules 9 through 12 of the Rules of Practice and Procedure of the Louisiana Public Service Commission ("LPSC" or "Commission"), and in support thereof states:

1.

OxyChem is a New York corporation owning Louisiana industrial concerns and operations, and is a large consumer of electric power in Louisiana. OxyChem owns and operates three chlor-alkali facilities—the Taft, Convent, and Geismar Facilities—within Louisiana. At the Taft Facility, OxyChem developed a cogeneration facility from which OxyChem can participate with bids into Requests for Proposals issued pursuant to the Market-Based Mechanism Rules. Therefore, OxyChem has an interest in this proceeding.

2.

Copies of all correspondence and filings with the Commission should be directed
to:

Luke F. Piontek
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8440 Jefferson Highway, Suite 301
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By Hand

3.

The proceeding was included in the Commission's Official Bulletin #1110, dated March 11, 2016. *See* LPSC Official Bulletin #1110, at p. 3. The notice of publication does not state a deadline to intervene; therefore, the default intervention period is applicable, and the filing of this Petition of Intervention is timely.

4.

The outcome of this proceeding regarding this proposed modification to the Commission's Market-Based Mechanism Rules could directly affect OxyChem's business interests in the state of Louisiana. Therefore, OxyChem possesses standing to intervene and requests formal intervenor status in this proceeding.

5.

OxyChem asserts that no other intervenor or party will adequately protect its interests in this docket.

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WHEREFORE, Occidental Chemical Corporation prays that it be granted full intervenor status herein and that it be given notice of any and all proceedings and deadlines in this matter, and for all other relief available to it under the facts and the law.

Respectfully submitted:

**ROEDEL, PARSONS, KOCH, BLACHE,
BALHOFF & McCOLLISTER**

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By:  _____

Luke F. Piontek (Bar Roll #19979)

J. Kenton Parsons (Bar Roll # 10377)

Gayle T. Kellner (Bar Roll # 20585)

Shelley Ann McGlathery (Bar Roll # 32585)

Attorneys for Occidental Chemical Corporation

CERTIFICATE

I hereby certify that on this day a copy of the foregoing Occidental Chemical Corporation's Petition of Intervention has been sent to the official service list by email, and served by United States mail, postage prepaid, through their representatives, at the following addresses:

All Commissioners

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Baton Rouge, Louisiana, this 1st day of April, 2016.

A handwritten signature in black ink, appearing to read "Luke F. Piontek", written over a horizontal line.

Luke F. Piontek