

Control Number: 45624



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APPLICATION OF THE CITY OF §
GARLAND, TEXAS, FOR A §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
PROPOSED RUSK TO PANOLA §
DOUBLE-CIRCUIT 345-KV §
TRANSMISSION LINE IN RUSK AND §
PANOLA COUNTIES, TEXAS §

PUBLIC UTILITY COMMISSION
BEFORE THE CLERK

STATE OFFICE OF
ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE OF NRG COMPANIES

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Pursuant to §§22.103 and 22.104 of the Procedural Rules of the Public Utility Commission of Texas and SOAH Order No. 1 issued in this docket, NRG Texas Power, LLC, Reliant Energy Retail Services, LLC, and NRG Power Marketing, LLC (collectively "NRG") files this Motion to Intervene. In support thereof, NRG respectfully show as follows:

I. Authorized Representative

The telephone number and address of NRG's authorized representative is as follows:

Mark A. Walker
NRG Energy, Inc.
300 West 6th Street, Suite 1600
Austin, TX 78701
Telephone: (512) 585-0450
Facsimile: (512) 691-6353
Email: mark.walker@nrg.com

NRG requests that all information, responses to requests for information and documents in this proceeding be served upon its authorized representative at the address or fax number listed above.

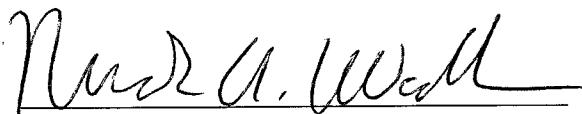
II. Basis for Standing

As a power generation company, power marketer and retail electric provider operating within the Electric Reliability Council of Texas ("ERCOT"), NRG is directly impacted by this application to amend its certificate of convenience and necessity ("CCN") for the proposed Rusk to Panola double-circuit 345 kV transmission line in Rusk and Panola Counties. In addition, this proceeding will address issues of first impression regarding the operation of direct current interconnections for import and export of power to ERCOT. NRG's operations in the ERCOT wholesale and retail markets are directly and significantly impacted by the reliability and adequacy of transmission service within ERCOT and the addition of new interconnections to areas outside of ERCOT. Because it will be affected by the outcome of this proceeding, NRG has a justiciable interest and standing to intervene under §22.103 of the Procedural Rules of the Commission of Texas and hereby respectfully requests that it be granted intervener status and allowed to fully participate in this proceeding as a party hereto.

III. Request for Intervener Status

Based on the foregoing, NRG respectfully requests that its Motion to Intervene be granted and that it be granted full party status in this proceeding.

Respectfully submitted,



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ATTORNEY FOR NRG

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding by hand delivery, courier, overnight delivery, certified mail (return receipt requested), registered mail, facsimile, electronic mail, or United States first class mail on this 28 day of March, 2016.