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APPLICATION OF THE ELECTRIC	§	PUBLIC UTILITY COMMISSION
RELIABILITY COUNCIL OF TEXAS,	§	
INC. FOR A DEBT OBLIGATION	§	
ORDER TO FINANCE UPLIFT	§	OF TEXAS
BALANCES UNDER PURA CHAPTER	§	
39, SUBCHAPTER M, AND FOR	§	
GOOD CAUSE EXCEPTION	§	

TEXAS INDUSTRIAL ENERGY CONSUMERS'
STATEMENT OF POSITION

Texas Industrial Energy Consumers (“TIEC”) files this Statement of Position in lieu of testimony in the above-captioned docket. TIEC is still evaluating ERCOT’s application for a financing order under PURA Chapter 39, Subchapter M, but at this time has not identified any issues with the proposal. TIEC reserves its right to participate fully at the hearing on the merits, conduct cross examination, file post-hearing briefs, and take additional positions based on the testimony filed by other parties.

Respectfully submitted,

O’MELVENY & MYERS LLP

/s/ Katie Coleman

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 12th day of August 2021 by hand-delivery, facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard