



## Filing Receipt

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<b>APPLICATION OF THE ELECTRIC</b>	<b>§</b>	<b>BEFORE THE</b>
<b>RELIABILITY COUNCIL OF TEXAS,</b>	<b>§</b>	
<b>INC. FOR A DEBT OBLIGATION</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ORDER UNDER PURA CHAPTER 39,</b>	<b>§</b>	
<b>SUBCHAPTER M, AND REQUEST</b>	<b>§</b>	<b>OF TEXAS</b>
<b>FOR A GOOD CAUSE EXCEPTION</b>	<b>§</b>	

**CITY OF AUSTIN D/B/A AUSTIN ENERGY’S MOTION TO INTERVENE**

COMES NOW, the City of Austin d/b/a Austin Energy (Austin Energy) and files this Motion to Intervene in the above-referenced proceeding pursuant to 16 Texas Administrative Code (TAC) §§ 22.103 and 22.104. In support of its Motion, Austin Energy shows as follows:

1. Austin Energy is a municipally-owned utility that manages a large, diverse generation resource portfolio, operates as a transmission and distribution utility including responding to load shed directives from the Electric Reliability Council of Texas (ERCOT), and provides retail electricity service to an expansive customer base ranging from residential to large commercial and industrial customers in the Austin metropolitan region.

2. On July 16, 2021, ERCOT filed its Application for a Debt Obligation Order under PURA Chapter 39, Subchapter M, and Request for a Good Cause Exception (ERCOT’s Default Application). On July 20, 2021, the Public Utility Commission of Texas (Commission) issued Order No. 1, which set an intervention deadline of July 27, 2021.<sup>1</sup> Therefore, this motion is timely filed.

3. In its application, ERCOT states that all wholesale market participants in ERCOT will be affected by the Debt Obligation Order requested in its application.<sup>2</sup> The issues addressed in ERCOT’s Default Application concern default balance financing and default charges to be allocated to and collected from market participants. Austin Energy is a market participant in ERCOT. Austin Energy, as well as its residents and businesses, may be adversely impacted by the relief requested by ERCOT. Therefore, Austin Energy has a justiciable interest in this proceeding.

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<sup>1</sup> Order No. 1 – Entering Protective Order, Requiring Commission Staff’s Recommendation, Adopting a Procedural Schedule, Notifying the Parties of a Prehearing Conference, and Discussing Other Procedural Matters at 2 (Jul. 20, 2021).

<sup>2</sup> Application at 5 (Jul. 16, 2021).

4. Additionally, Austin Energy has standing to participate in this proceeding pursuant to Public Utility Regulatory Act (PURA) § 33.025.<sup>3</sup>

5. Austin Energy's authorized representatives in this matter are:

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WHEREFORE PREMISES CONSIDERED, Austin Energy respectfully requests that this Motion to Intervene be granted.

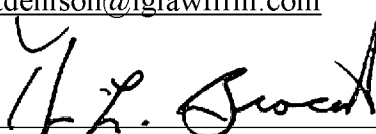
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<sup>3</sup> Public Utility Regulatory Act, Tex. Util. Code Ann. § 33.025 (PURA).

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

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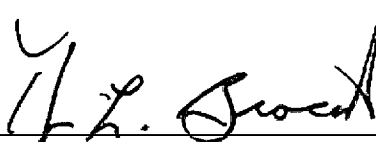
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**ATTORNEY FOR CITY OF AUSTIN,  
D/B/A AUSTIN ENERGY**

**CERTIFICATE OF SERVICE**

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on July 23, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



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THOMAS L. BROCATO