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DOCKET NO. 52321

APPLICATION OF THE ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC. FOR A DEBT OBLIGATION ORDER UNDER PURA CHAPTER 39, SUBCHAPTER M, AND REQUEST FOR A GOOD CAUSE EXCEPTION	§ § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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EDF ENERGY SERVICES, LLC'S STATEMENT OF POSITION

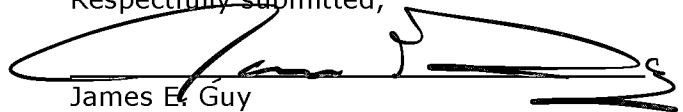
EDF Energy Services, LLC ("EDFES") files the following statement of position in accordance with Order No. 2 and Public Utility Commission of Texas ("PUCT" or "Commission") procedural rule 22.124, 16 Tex. Admin. Code § 22.124. Order No. 2 sets August 12, 2021, as the deadline for Statements of Position and, therefore, this statement is timely filed.

As the applicant in this proceeding, the Electric Reliability Council of Texas, Inc. ("ERCOT") has the burden of proof. EDFES continues to evaluate ERCOT's application and testimony, and plans to review and evaluate issues raised by the other parties in the intervenor testimony that is due on August 12, 2021.

Based on EDFES's consideration of ERCOT's application so far, EDFES supports ERCOT's request for approval of a Debt Obligation Order to securitize \$800 million of default balances. EDFES also generally supports the implementation details included in ERCOT's application, but continues to review ERCOT's application and filings made by other parties. Accordingly, EDFES reserves the right to amend or supplement this Statement of Position after review of the evidence and positions of other parties regarding ERCOT's requested relief.

EDFES also reserves the right to participate in the hearing on the merits and to take additional positions on other issues, including through cross examination at the hearing or through briefing.

Respectfully submitted,



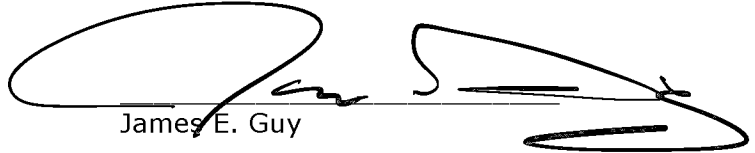
James E. Guy
State Bar No. 24027061
DEACON LAW GROUP PLLC
913 Main Street
Bastrop, Texas 78602
(512) 576-2435 (Telephone)
jamesguy@deaconlawgroup.com

Attorney for EDF Energy Services, LLC

August 12, 2021

CERTIFICATE OF SERVICE

I hereby certify that in accordance with Order No. 2, a copy of this document has been filed on the Commission's Interchange and such filing constitutes service of the document on all parties in this proceeding on the 12th day of August, 2021.

A handwritten signature in black ink, appearing to read "James E. Guy", is written over a horizontal line. The signature is stylized with a large loop on the left and a long, sweeping stroke on the right.

James E. Guy