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DOCKET NO. 52321

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

**THE COALITION OF COMPETITIVE
RETAIL ELECTRIC PROVIDERS’
MOTION TO INTERVENE**

The Coalition of Competitive Retail Electric Providers (“CCR”) files this Motion to Intervene on behalf of the identified Retail Electric Providers (“REPs”) and respectfully requests that it be granted party status in this proceeding.¹

I.

The CCR seeks to participate in the above-captioned proceeding on behalf of the identified REPs pursuant to Public Utility Commission ("Commission" or "PUC") PROC. R. 22.103 and 22.104. The CCR is comprised of retail electric providers certificated by the Commission to provide retail electric service in regions of Texas within the Electric Reliability Council of Texas ("ERCOT") and who are load-serving entities ("LSEs") and wholesale market participants that will be affected by the financing order sought in this docket. Additionally, ERCOT's request for an order initiating a parallel docket concerns collection of information from LSEs, and thus concerns and affects the identified REPs. Therefore, the CCR on behalf of its participating REPs has a justiciable interest that may be adversely affected by the outcome of this proceeding and should be granted party status.

¹ The Coalition of Competitive Retail Electric Providers requesting intervention status are identified in Attachment One.

II.

The CCR requests that it be served with all future discovery, pleadings, orders and correspondence regarding this case in accordance with the following service address:

THE LAW OFFICE OF MIGUEL A. HUERTA, PLLC
7500 Rialto Blvd., Ste. 250
Austin, Texas 78735
512-502-5544 (Telephone)
512-532-0757 (Facsimile)
miguel@mhuertalaw.com

III.

Wherefore, Premises Considered, the CCR respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully Submitted,

By: _____



Miguel A. Huerta
State Bar No. 00787733

**THE LAW OFFICE OF MIGUEL A.
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**ATTORNEY FOR THE COALITION OF
COMPETITIVE RETAILERS**

CERTIFICATE OF SERVICE

I certify that on July 26, 2021 this instrument was filed with the Public Utility Commission of Texas and a true and correct copy of it was served on all parties of record in this proceeding by e-mail.



Miguel A. Huerta

Attachment One

Coalition of Competitive Retail Electric Providers Supporting These Comments

Background

The Coalition of Competitive Retailers is an ad hoc group of competitive Retail Electric Providers that joined together in its desire to address the market issues stemming from the February 2021 Winter Weather Emergency.

Participants in this filing:

Alliance Power Company LLC – certificate number 10074
Brooklet Energy Distribution LLC – certificate number 10137
Bulb US LLC – certificate number 10266
Freepoint Energy Solutions LLC – certificate number 10248
Summer Energy LLC – certificate number 10205
Young Energy LLC – certificate number 10110