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PUC DOCKET NO. 52321

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APPLICATION OF THE ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC. FOR A DEBT OBLIGATION ORDER PURSUANT TO CHAPTER 39, SUBCHAPTER M, OF THE PUBLIC UTILITY REGULATORY ACT

BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS

GEXA ENERGY LP'S MOTION TO INTERVENE

Gexa Energy, LP ("Gexa")¹ files this Motion to Intervene and respectfully requests that Gexa be granted party status in this proceeding.

I.

Gexa seeks to participate in the above-captioned proceeding pursuant to Public Utility Commission ("Commission" or "PUC") procedural rules 16 TAC §§ 22.103 and 22.104. Gexa is a retail electric provider ("REP") certificated by the Commission to provide retail electric service in regions of Texas within the Electric Reliability Council of Texas ("ERCOT") and is a loadserving entity ("LSE") and wholesale market participant that will be affected by the financing order sought in this docket. Therefore, Gexa has a justiciable interest that may be adversely affected by the outcome of this proceeding and should be granted party status.

II.

Gexa requests to be served with all future discovery, pleadings, orders and correspondence regarding this case in accordance with the following service address:

¹ Gexa holds REP Certificate No. 10027.

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III.

Wherefore, Premises Considered, Gexa respectfully requests that it be granted intervenor

status to participate as a party in this proceeding.

Respectfully submitted,

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Catherine J. Wébking State Bar No. 21050055 <u>cwebking@scottdoug.com</u> Stephanie Kover State Bar No. 24102042 <u>skover@scottdoug.com</u> SCOTT DOUGLASS & MCCONNICO LLP 303 Colorado Street, Suite 2400 Austin, Texas 78701 512.495.6337 512.495.6399 (facsimile)

ATTORNEYS FOR GEXA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on this 27th day of July 2021.

Stephanie Kover