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

MOTION TO INTERVENE OF THE ENERGY TRADING INSTITUTE

Pursuant to Procedural Rules 22.103(b) and 22.104 of the Public Utility Commission of Texas (“Commission”), the Energy Trading Institute (“ETI”) hereby files this motion to intervene in the above-captioned proceeding. ETI represents a diverse group of energy market participants, all with substantial interests in wholesale electricity transactions in Commission-jurisdictional markets. ETI members are registered as Qualified Scheduling Entities (“QSE”) and Congestion Revenue Rights Account Holders (“CRRRAH”) with the Electric Reliability Council of Texas (“ERCOT”) and are regular participants in the ERCOT day-ahead and Congestion Revenue Right (“CRR”) auction markets.

In this proceeding, ERCOT proposes to collect Default Charge payments from QSE and CRRRAH registered entities. Accordingly, ETI has standing to intervene under Section 22.103(b) of Title 16 of the Texas Administrative Code since ETI has justiciable interests which may be adversely affected by the outcome of this proceeding.

ETI requests that all notices, correspondence, pleadings, requests and responses for information, and other documents submitted in this proceeding be served upon the following authorized representatives for ETI:

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Attorneys for ETI

For the foregoing reasons, ETI respectfully requests that it be granted leave to intervene in the above-captioned proceeding.

Respectfully submitted,

/s/ Casey Khan

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CERTIFICATE OF SERVICE

I certify that on July 27, 2021 this motion to intervene 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.

/s/ Casey Khan

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