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

LUBBOCK POWER & LIGHT’S MOTION TO INTERVENE

The City of Lubbock, acting by and through Lubbock Power & Light (LP&L), files this Motion to Intervene in the above-referenced proceeding pursuant to 16 Tex. Admin. Code (TAC) §§ 22.103 and 22.104, and in support thereof, respectfully shows the following:

I. INTRODUCTION

On July 16, 2021, the Electric Reliability Council of Texas (ERCOT) filed the application for a debt obligation order under PURA Chapter 39, Subchapter M. On July 20, 2021, the Public Utility Commission of Texas (Commission) issued Order No. 1, which set an intervention deadline of July 27, 2021.¹ This motion is timely filed.

II. JUSTICIABLE INTEREST

In its application, ERCOT states that all wholesale market participants in ERCOT will be affected by the Debt Obligation Order requested in its application.² The issues addressed in ERCOT’s application concern default balance financing and default charges to be allocated to and collected from market participants. LP&L is a market participant in ERCOT. Therefore, LP&L has a justiciable interest that may be adversely affected by the outcome of this proceeding.

III. DESIGNATION OF REPRESENTATIVE

The address and telephone number of LP&L’s authorized legal representatives are as follows:

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

² Application at 5 (Jul. 16, 2021).

Lambeth Townsend
William A. "Cody" Faulk, III
Reid Barnes
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Ave., Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
ltownsend@lglawfirm.com
cfaulk@lglawfirm.com
rbarnes@lglawfirm.com

LP&L requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served upon LP&L's authorized representative.

IV. PRAYER

LP&L respectfully asserts that it has a justiciable interest in this proceeding and prays that its Motion to Intervene be granted and that it be afforded full party status in this matter.

Respectfully submitted,

LLOYD GOSSELINK
ROCHELLE & TOWNSEND, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532

/s/ Lambeth Townsend

LAMBETH TOWNSEND
State Bar No. 20167500
E-Mail: ltownsend@lglawfirm.com

WILLIAM A. FAULK, III
State Bar No. 24075674
E-Mail: cfaulk@lglawfirm.com

REID BARNES
State Bar No. 24101487
E-Mail: rbarnes@lglawfirm.com

**ATTORNEYS FOR THE CITY OF LUBBOCK,
ACTING BY AND THROUGH LUBBOCK
POWER & LIGHT**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on July 27, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Lambeth Townsend

LAMBETH TOWNSEND