



## Filing Receipt

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**PUC 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 §  
§  
§**

**BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS**

**BP ENERGY COMPANY’S MOTION TO INTERVENE**

BP Energy Company (“BP Energy”) files this Motion to Intervene and respectfully requests that BP Energy be granted party status in this proceeding.

**I.**

BP Energy seeks to participate in the above-captioned proceeding pursuant to Public Utility Commission (“Commission”) PROC. R. 22.103 and 22.104. BP Energy is a wholesale market participant within the Electric Reliability Council of Texas (“ERCOT”), a Congestion Revenue Right (“CRR”) Holder, a retail electric provider (“REP”) certificated by the Commission to provide retail electric service in regions of Texas and a load-serving entity (“LSE”), and an ERCOT Qualified Scheduling Entity for multiple other REPs who are LSEs. ERCOT’s requested relief in this docket would result in the collection of Default Charge payments from QSEs and CRR Account Holders, which could ultimately impact LSEs. As such, BP Energy has standing to intervene under 16 TAC § 22. 103(b) because its justiciable interests may be adversely affected by the outcome of this proceeding.

**II.**

BP Energy requests that it be served with all future discovery, pleadings, orders and correspondence regarding this case in accordance with the following service addresses:

Andrea Kunkel  
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**III.**

BP Energy respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully submitted,

*/s/ Andrea Kunkel*  
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**ATTORNEY FOR  
BP ENERGY COMPANY**

## **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 27<sup>th</sup> day of July 2021 by e-mail.

*/s/ Betsy Carr*  
Betsy Carr