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PUC DOCKET NO. 52321

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

**PUBLIC UTILITY
COMMISSION OF TEXAS**

GOLDEN SPREAD ELECTRIC COOPERATIVE INC.'S MOTION TO INTERVENE

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, Golden Spread Electric Cooperative, Inc. (“Golden Spread”), and files this Motion to Intervene in the above-captioned proceeding, pursuant to Sections 22.103(b) and 22.104 of the Rules of Practice and Procedure of the Public Utility Commission of Texas (“Commission”).

In support thereof, Golden Spread shows the following:

Golden Spread designates the following individuals as its authorized representatives for this proceeding and requests that all pleadings, notices, correspondence, or other documents be served upon the following:

Todd F. Kimbrough
BALCH & BINGHAM LLP
919 Congress Avenue
Suite 1110
Austin, Texas 78701
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Amarillo, Texas 79105-5898
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I. GOLDEN SPREAD

Golden Spread is a non-profit electric generation and transmission cooperative organized under Texas law with its principal place of business in Amarillo, Texas. Its main corporate purpose is to supply cost effective and reliable wholesale electric power to its sixteen (16) member non-profit distribution cooperatives (“Members”).¹ Golden Spread’s Members serve about 310,000 retail electric meters serving their Member-Consumers located over an expansive area, including the Panhandle, South Plains and Edwards Plateau regions of Texas (covering twenty-four percent (24%) of the state, the Panhandle of Oklahoma, and small portions of Southwestern Kansas and Southeastern Colorado.

II. NATURE OF THE CASE

On July 16, 2021, Electric Reliability Council of Texas, Inc. (“ERCOT”) filed an application for a debt obligation order to finance default balances pursuant to Chapter 39, Subchapter M, of the Public Utility Regulatory Act.

III. JUSTICIABLE INTERESTS

Golden Spread and its Members will be directly affected by the Commission’s decision in this Docket because charges approved by the Commission in this proceeding will be applied to Golden Spread and its Members. Consequently, Golden Spread has a justiciable interest in this proceeding and will be directly affected by the Commission’s decision in this proceeding. No

¹ Fifteen (15) of Golden Spread’s sixteen (16) distribution cooperative members operate in Texas. They are Bailey County Electric Cooperative Association (Muleshoe, Texas); Big Country Electric Cooperative, Inc. (Roby, Texas); Coleman County Electric Cooperative, Inc. (Coleman, Texas); Concho Valley Electric Cooperative, Inc. (San Angelo, Texas); Deaf Smith Electric Cooperative, Inc. (Hereford, Texas); Greenbelt Electric Cooperative, Inc. (Wellington, Texas); Lamb County Electric Cooperative, Inc. (Littlefield, Texas); Lighthouse Electric Cooperative, Inc. (Floydada, Texas); Lyntegar Electric Cooperative, Inc. (Tahoka, Texas); North Plains Electric Cooperative, Inc. (Perryton, Texas); Rita Blanca Electric Cooperative, Inc. (Dalhart, Texas); South Plains Electric Cooperative, Inc. (Lubbock, Texas); Southwest Texas Electric Cooperative, Inc. (Eldorado, Texas); Swisher Electric Cooperative, Inc. (Tulia, Texas); and Taylor Electric Cooperative, Inc. (Merkel, Texas). Golden Spread also serves Tri-County Electric Cooperative, Inc. (Hooker, Oklahoma).

other entity can adequately represent Golden Spread's interests, so Golden Spread seeks to intervene in this proceeding to protect its interests. Golden Spread has therefore demonstrated standing to intervene as required by 16 Tex. Admin. Code § 22.103.

IV. CONCLUSION

For the above stated reasons, Golden Spread respectfully requests that the Commission grant this Motion to Intervene and admit Golden Spread as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

/s/ Todd Kimbrough

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Email: mberry@gsec.coop

**ATTORNEYS FOR GOLDEN SPREAD
ELECTRIC COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by email, facsimile, hand-delivery, overnight delivery, or 1st Class U.S. Mail on all parties of record in this proceeding on July 27, 2021.

/s/ Todd F. Kimbrough
Todd F. Kimbrough

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