



## Filing Receipt

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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 §**

**MOTION TO INTERVENE OF TEXPO POWER LP**

Texpo Power LP (“Texpo”) files this Motion to Intervene in the above-styled proceeding in accordance with Order No. 1 and 16 Tex. Admin. Code (TAC) §§ 22.102-22.104. Order No. 1 establishes the intervention deadline as July 27, 2021, and, therefore, this Motion is timely filed. In support thereof, Texpo respectfully shows as follows:

**I. AUTHORIZED REPRESENTATIVES**

The contact information for Texpo’s authorized representatives is as follows:

James Guy  
Deacon Law Group PLLC  
913 Main St.  
Bastrop, Texas 78602  
(512) 576-2435 (Telephone)  
jamesguy@deaconlawgroup.com

All pleadings and other documents should be served upon Texpo’s authorized representatives.

**II. TEXPO’S INTEREST**

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. In its application, ERCOT states that all wholesale market participants in ERCOT will be affected by the Debt Obligation Order requested in its application. Texpo is registered as a Qualified Scheduling Entity (QSE), a Congestion Revenue Rights Account Holder (CRRAH), and a Load Serving Entity (LSE), and regularly participates in the ERCOT

market. ERCOT proposes in this proceeding to collect Default Charge payments from QSEs, CRRAHs, and LSEs, including Texpo.

Accordingly, Texpo has a justiciable interest in the outcome of this proceeding and should be admitted as an intervenor.

**III. CONCLUSION AND PRAYER**

WHEREFORE, PREMISES CONSIDERED, Texpo respectfully requests that the Commission grant this Motion to Intervene, admit Texpo as an intervenor in this proceeding for all purposes, and grant Texpo such other relief to which it may be justly entitled.

Respectfully submitted,



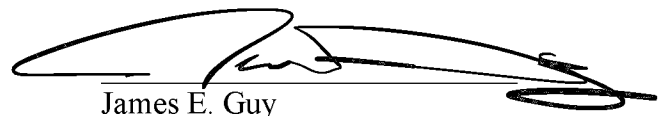
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*Attorney for Texpo Power LP*

July 27, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all parties by email on the 27th day of July, 2021.



James E. Guy