



## Filing Receipt

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

**SARACEN ENERGY WEST LP**  
**MOTION TO INTERVENE**

Saracen Energy West LP (“Saracen”) hereby files this motion to intervene in the above-referenced proceeding pursuant to Procedural Rules 22.103 and 22.104 of the Public Utility Commission of Texas.

Saracen is registered as a Congestion Revenue Right Account Holder (“CRRRAH”) with the Electric Reliability Council of Texas (“ERCOT”). In the referenced proceeding, ERCOT proposes to collect payments of “Default Charges” from CRRRAH participants like Saracen. Accordingly, Saracen has a justiciable interest which may be adversely affected by the outcome of the proceeding and standing to intervene under Procedural Rule 22.103(b).

The name, address, telephone number and email address of Saracen’s authorized representative is:

Allison Duensing  
General Counsel  
Saracen Energy West LP  
3033 W. Alabama  
Houston, Texas 77098  
Phone: (713) 366-7059  
Email: [aduensing@saracenenergy.com](mailto:aduensing@saracenenergy.com)

All pleadings and other documents should be served upon Saracen’s authorized representative.

Saracen respectfully requests this motion to intervene be granted and Saracen be admitted as an intervenor in this proceeding.

Respectfully submitted,

/s/ Allison Duensing  
Allison Duensing  
General Counsel  
TX State Bar No. 24040832  
Saracen Energy West LP  
3033 W. Alabama  
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(713) 366-7059  
aduensing@saracenenergy.com  
*Authorized Rep for Saracen*

**CERTIFICATE OF SERVICE**

I, Allison Duensing, General Counsel, certify that a copy of this document was served on all parties of record in this proceeding on July 27, 2021 in the following manner: electronic mail.

/s/ Allison Duensing  
Allison Duensing