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

TERRAFORM POWER OPERATING, LLC’S MOTION TO INTERVENE

Pursuant to 16 TEXAS ADMINISTRATIVE CODE (“TAC”) §§ 22.103(b) and 22.104, TerraForm Power Operating, LLC (“TerraForm”) files this Motion to Intervene in the above-referenced filing. Order No. 1 was issued on July 20, 2021 and included a procedural schedule establishing July 27, 2021 as the intervention deadline in this proceeding. Therefore, this Motion is timely filed.

I. AUTHORIZED REPRESENTATIVES

The names and contact information for representatives of this proceeding are:

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All pleadings, orders, and other documents should be served on TerraForm’s authorized representatives.

II. MOTION TO INTERVENE

TerraForm owns and operates power generation companies, Rattlesnake Wind I LLC and South Plains Wind Energy, LLC, which are market participants in the ERCOT wholesale market registered as resource entities (“REs”). Rattlesnake Wind I is also registered as a Qualified Scheduling Entity (“QSE”). Under 16 TAC § 22.103(b), a person has standing to intervene if that person has “a justiciable interest which may be adversely affected by the outcome of the

proceeding.”¹ ERCOT’s requested relief in this proceeding would result in collection of Default Charge payments from QSEs, which would ultimately impact REs. Consequently, TerraForm has a justiciable interest that may be adversely affected by the outcome of this proceeding and therefore has standing to intervene under 16 TAC § 22.103(b).

III. CONCLUSION

For the reasons stated herein, TerraForm respectfully requests that the Public Utility Commission of Texas (“Commission”) grant its motion to intervene, admit TerraForm as party in this proceeding, and grant any other relief to which it may be entitled.

Respectfully submitted,

/s/ Carrie Collier-Brown (with permission)

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¹ See 16 TEX. ADMIN. CODE §§ 22.103(b)(1) and (2).

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on July 27, 2021 via email in accordance with the requirements in the Commission's Second Order Suspending Rules issued in Project No. 50664.

/s/ Matthew Arth

Matthew A. Arth