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Received - 2021-07-27 02:09:27 PM

Control Number - 52321

ItemNumber - 37

PUC DOCKET NO. 52321

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

CALPINE CORPORATION’S MOTION TO INTERVENE

Calpine Corporation (“Calpine”), on behalf of its subsidiaries participating in wholesale markets, moves to intervene in the above-styled proceeding pursuant to the Public Utility Regulatory Act (“PURA”), Tex. Util. Code Ann. §§ 11.001 et seq., 16 Tex. Admin. Code (“TAC”) §§ 22.101, 22.103(b) and 22.104. Calpine would show as follows:

1. The names, address, and telephone number of Calpine’s authorized representatives are:

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All pleadings and other documents should be served upon Calpine's authorized representatives.

2. On July 16, 2021, the Electric Reliability Council of Texas ("ERCOT") filed an application to issue an order: (1) allowing for financing of \$800 million; (2) allowing ERCOT to finance the amount of the default balance owed to ERCOT as a consequence of default of certain market participants on obligations owed to ERCOT attributable to Winter Storm Uri; (3) to establish default charges to be assessed to certain wholesale market participants; and, (4) to institute an adjustment mechanism ("debt obligation order"). The application was filed pursuant to Subchapter M of PURA.¹

3. Calpine is the upstream corporate owner of power marketer companies, power generation companies,² qualifying facilities, congestion revenue rights account holders, retail electric providers, and qualified scheduling entities (and sub-qualified scheduling entities) that participate in the ERCOT wholesale markets and would therefore be liable to pay the default charges ERCOT seeks authority to assess in this proceeding. As such, Calpine, in its own right and on behalf of these entities, possesses a justiciable interest that may be adversely affected by the outcome of this proceeding.

In recognition of its justiciable interest, Calpine Corporation requests that the Commission grant its Motion to Intervene and admit Calpine as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

¹ Tex. Util. Code Ann. §§ 39.601 et seq.

² Calpine is also a power generation company in its own right.

Respectfully submitted,

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**ATTORNEYS FOR:
CALPINE CORPORATION**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on the 27th day of July, 2021 in accordance with the Order Suspending Rules, issued in Project No. 50664.



Chris Reeder