



## Filing Receipt

**Received - 2021-07-19 12:46:08 PM**

**Control Number - 52321**

**ItemNumber - 3**

**PUC DOCKET NO. 52321**

<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>	

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.’S  
REQUEST FOR SCHEDULING CONFERENCE**

Applicant Electric Reliability Council of Texas, Inc. (“ERCOT”) requests that the Administrative Law Judge (“ALJ”) assigned to preside over this docket schedule a conference to establish a procedural schedule in this docket. Because of the expedited schedule mandated by statute for this case, ERCOT requests that the scheduling conference occur on or before July 27, 2021.

**I. Request for Scheduling Conference**

Section 39.603(g) of the Public Utility Regulatory Act (“PURA”) requires that the Public Utility Commission of Texas (“Commission”) issue an order in this docket not later than 90 days after the filing of the application, which occurred on July 16, 2021. Therefore, the Commission must issue a final order on or before October 14, 2021.

To process this case within the 90-day timeline, it will be necessary to retain this case at the Commission and to establish an accelerated procedural schedule. In Attachment 2 to the July 16, 2021 application, ERCOT proposed an accelerated procedural schedule that would allow the Commission to decide this case by the statutory deadline. For the ALJ’s convenience, that proposed procedural schedule is attached to this motion as well.

ERCOT requests a scheduling conference with the ALJ, Staff, and any parties who intervene by the date of the scheduling conference to discuss the proposed procedural schedule.

Because of the expedited deadline for issuing a final order in this docket, ERCOT requests that the scheduling conference occur on or before July 27, 2021.

## II. Prayer

ERCOT requests that the ALJ set a scheduling conference on or before July 27, 2021 to establish a procedural schedule for this docket. ERCOT further requests all other relief to which it may be entitled.

### WINSTEAD PC

By:       /s/      *Elliot Clark*

Elliot Clark  
State Bar No. 24012428  
[eclark@winstead.com](mailto:eclark@winstead.com)  
Ron H. Moss  
State Bar No. 14591025  
[rhmoos@winstead.com](mailto:rhmoos@winstead.com)  
Jeff Nydegger  
State Bar No. 24077002  
[jnydegger@winstead.com](mailto:jnydegger@winstead.com)  
401 Congress Avenue, Suite 2100  
Austin, Texas 78701  
Telephone: (512) 370-2800  
Facsimile: (512) 370-2850

James Doyle  
State Bar No. 06094600  
[jdoyle@winstead.com](mailto:jdoyle@winstead.com)  
Winstead PC  
600 Travis Street, Suite 5200  
Houston, Texas 77002  
Telephone: (713) 650-8400  
Facsimile: (713) 650-2400

### ATTORNEYS FOR ERCOT

**PROPOSED PROCEDURAL SCHEDULE**

<b>DATE</b>	<b>EVENT</b>
July 16, 2021	ERCOT Application Filed
July 19, 2021	ERCOT Provides Proof of Notice to all Market Participants and Relevant ERCOT Committees and Files Proof of Notice with PUC
July 27, 2021	Intervention Deadline
July 27, 2021	Objections to ERCOT Direct Testimony
August 6, 2021	ERCOT Supplemental Testimony (if necessary)
August 13, 2021	Intervenor Direct Testimony
August 25, 2021	Staff Direct Testimony
August 25, 2021	Objections to Intervenor Testimony
August 30, 2021	ERCOT Rebuttal Testimony, Staff and Intervenor Cross-Rebuttal Testimony
August 30, 2021	Objections to Staff Testimony
September 1, 2021	Objections to Rebuttal Testimony and Cross-Rebuttal Testimony
September 1, 2021	Prehearing Conference
September 2-3, 2021	Hearing on the Merits – After PUC Open Meeting and Continues to September 3 if necessary.
September 10, 2021	Initial Briefs (25 page limit)
September 15, 2021	Reply Briefs (20 page limit)
September 23, 2021	PUC Open Meeting Discussion
October 7, 2021	PUC Open Meeting Discussion (if necessary)
October 14, 2021	Statutory Deadline to Issue Final Order

ERCOT proposes that responses to RFIs be due within 7 calendar days, objections to RFIs due within 3 calendar days, motions to compel due within 2 business days, and responses to motions to compel due within 2 business days.