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

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

SOUTH TEXAS ELECTRIC COOPERATIVE’S REQUEST TO INTERVENE

COMES NOW South Texas Electric Cooperative, Inc. (“STEC”) and files this Motion to Intervene in the above-styled proceeding pursuant to 16 Tex. Admin. Code (“TAC”) §§ 22.103 and 22.104, and in support thereof would show as follows:

I. INTRODUCTION

On July 16, 2021, the Electric Reliability Council of Texas, Inc. (“ERCOT”) filed its Application for a Debt Obligation Order under PURA Chapter 39, Subchapter M, and Request for a Good Cause Exception (“ERCOT’s Default Balance Application”). On July 20, 2021, the Public Utility Commission of Texas (“Commission”) issued Order No. 1, which set an intervention deadline of July 27, 2021. Therefore, this motion is timely filed.

II. AUTHORIZED REPRESENTATIVES

Pursuant to 16 TAC §§ 22.101, 22.103, and 22.104, STEC seeks to intervene in this proceeding. The names, addresses, and telephone numbers of STEC’s authorized representatives are as follows:

Diana M. Liebmann
Texas State Bar No. 00797058
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STEC requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in the proceeding be served upon STEC's authorized representatives.

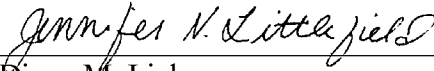
III. JUSTICIABLE INTEREST

The issues addressed in this proceeding concern the financing of default balances that may result in the allocation of default charges to ERCOT market participants. STEC is a generation and transmission electric cooperative that is a registered market participant in the ERCOT market. As an owner and operator of generation and transmission services, STEC participates in the ERCOT market in various manners, including as a resource entity, a transmission service provider, and a qualified scheduling entity. Therefore, STEC has a justiciable interest that may be adversely affected by the outcome of this proceeding.

STEC's interests may not be adequately represented by any other party, so STEC seeks to intervene in this proceeding to protect its interests. Having demonstrated standing to intervene, as required by 16 TAC § 22.103, STEC's request for intervention should be granted.

WHEREFORE, PREMISES CONSIDERED, STEC respectfully requests that it be granted intervenor status to participate as a party in this proceeding, and for such other relief to which it may be justly entitled.

Respectfully submitted,



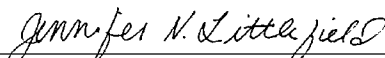
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**ATTORNEYS FOR SOUTH TEXAS
ELECTRIC COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was forwarded to all parties of record via electronic mail on the 27th day of July 2021 in accordance with the Second Order Suspending Rules, issued on July 16, 2020 in Project No. 50664.



Jennifer N. Littlefield