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

**MOTION TO INTERVENE OF VITOL INC.**

Pursuant to Procedural Rules 22.103(b) and 22.104 of the Public Utility Commission of Texas (“Commission”), Vitol Inc. (“Vitol”) hereby files this motion to intervene in the above-captioned proceeding. Vitol is registered as Qualified Scheduling Entities (“QSE”) for load serving entities (“LSEs”), is a Congestion Revenue Rights Account Holder (“CRRAH”) with the Electric Reliability Council of Texas (“ERCOT”) and is a regular participant in the ERCOT day-ahead and Congestion Revenue Right (“CRR”) auction markets.

In this proceeding, ERCOT proposes to collect Default Charge payments from QSE and CRRAH registered entities. Accordingly, Vitol has standing to intervene under Section 22.103(b) of Title 16 of the Texas Administrative Code since Vitol has justiciable interests which may be adversely affected by the outcome of this proceeding.

Vitol requests that all notices, correspondence, pleadings, requests and responses for information, and other documents submitted in this proceeding be served upon the following authorized representatives for Vitol:

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For the foregoing reasons, Vitol respectfully requests that it be granted leave to intervene in the above-captioned proceeding.

Respectfully submitted,

*/s/ Casey Khan*

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**CERTIFICATE OF SERVICE**

I certify that on July 27, 2021 this motion to intervene was filed with the Public Utility Commission of Texas and a true and correct copy of it was served on all parties of record in this proceeding by e-mail.

/s/ Casey Khan

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