



## Filing Receipt

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**PUC DOCKET NO. 52321**

<b>APPLICATION OF THE ELECTRIC</b>	<b>§</b>	
<b>RELIABILITY COUNCIL OF TEXAS,</b>	<b>§</b>	<b>BEFORE THE</b>
<b>INC. FOR A DEBT OBLIGATION</b>	<b>§</b>	
<b>ORDER PURSUANT TO CHAPTER 39,</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>SUBCHAPTER M, OF THE PUBLIC</b>	<b>§</b>	
<b>UTILITY REGULATORY ACT</b>	<b>§</b>	<b>OF TEXAS</b>

**JUST ENERGY’S MOTION TO INTERVENE**

Just Energy Texas, LP, Fulcrum Energy dba Amigo Energy, Tara Energy, and Hudson Energy Services, LLC (collectively, “Just Energy”)<sup>1</sup> file this Motion to Intervene and respectfully request that Just Energy be granted party status in this proceeding.

**I.**

Just Energy seeks to participate in the above-captioned proceeding pursuant to Public Utility Commission (“Commission” or “PUC”) PROC. R. 22.103 and 22.104. Just Energy is comprised of retail electric providers (“REPs”) certificated by the Commission to provide retail electric service in regions of Texas within the Electric Reliability Council of Texas (“ERCOT”) and who are load-serving entities (“LSEs”) and wholesale market participants that will be affected by the financing order sought in this docket. Therefore, Just Energy has a justiciable interest that may be adversely affected by the outcome of this proceeding and should be granted party status.

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<sup>1</sup> Just Energy holds REP Certificate No. 10052; Fulcrum Energy d/b/a Amigo Energy holds REP Certificate No. 10081; Tara Energy holds REP Certificate No. 10051; and Hudson Energy holds REP Certificate No. 10092.

II.

Just Energy requests that it be served with all future discovery, pleadings, orders and correspondence regarding this case in accordance with the following service address:

Catherine J. Webking  
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III.

Wherefore, Premises Considered, Just Energy respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully submitted,




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**ATTORNEYS FOR JUST ENERGY**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on this 21st day of July 2021.

  
Stephanie Kover