



Filing Receipt

Received - 2021-07-22 04:48:58 PM

Control Number - 52321

ItemNumber - 8

DOCKET NO. 52321

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

CITY OF GARLAND’S MOTION TO INTERVENE

The City of Garland, whose municipally owned electric utility operates under the name of Garland Power & Light (Garland), files this Motion to Intervene in the above-referenced proceeding pursuant to 16 Tex. Admin. Code (TAC) §§ 22.103 and 22.104, and in support thereof, respectfully shows the following:

I. INTRODUCTION

On July 16, 2021, the Electric Reliability Council of Texas (ERCOT) filed the application for a debt obligation order under PURA Chapter 39, Subchapter M. On July 20, 2021, the Public Utility Commission of Texas (Commission) issued Order No. 1, which set an intervention deadline of July 27, 2021.¹ This motion is timely filed.

II. JUSTICIABLE INTEREST

In its application, ERCOT states that all wholesale market participants in ERCOT will be affected by the Debt Obligation Order requested in its application.² The issues addressed in ERCOT’s application concern default balance financing and default charges to be allocated to and collected from market participants. Garland is a market participant in ERCOT. Therefore, Garland has a justiciable interest that may be adversely affected by the outcome of this proceeding.

¹ Order No. 1 Entering Protective Order, Requiring Commission Staff’s Recommendations, Adopting a Procedural Schedule, Notifying the Parties of a Prehearing Conference, and Discussing Other Procedural Matters at 2 (Jul. 20, 2021).

² Application at 5 (Jul. 16, 2021).

III. DESIGNATION OF REPRESENTATIVE

The address and telephone number of Garland's authorized legal representatives are as follows:

Lambeth Townsend
William A. "Cody" Faulk, III
Reid Barnes
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Ave., Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
ltownsend@lglawfirm.com
cfaulk@lglawfirm.com
rbarnes@lglawfirm.com

Garland requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served upon Garland's authorized representative.

IV. PRAYER

Garland respectfully asserts that it has a justiciable interest in this proceeding and prays that its Motion to Intervene be granted and that it be afforded full party status in this matter.

BRIAN C. ENGLAND
State Bar No. 24059722
City Attorney
CITY OF GARLAND
200 North 5th Street, Suite 416
Garland, Texas 75040
Telephone: (972) 205-2380
Facsimile: (972) 205-2389

**ATTORNEY FOR THE
CITY OF GARLAND**

Respectfully submitted,

LLOYD GOSSELINK
ROCHELLE & TOWNSEND, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532

/s/ Lambeth Townsend

LAMBETH TOWNSEND
State Bar No. 20167500
E-Mail: ltownsend@lglawfirm.com

WILLIAM A. FAULK, III
State Bar No. 24075674
E-Mail: cfaulk@lglawfirm.com

REID BARNES
State Bar No. 24101487
E-Mail: rbarnes@lglawfirm.com

ATTORNEYS FOR THE CITY OF GARLAND

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on July 22, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Lambeth Townsend

LAMBETH TOWNSEND