



Filing Receipt

Received - 2021-07-23 01:23:54 PM

Control Number - 52322

ItemNumber - 11

DOCKET NO. 52322

**APPLICATION OF THE) PUBLIC UTILITY COMMISSION
ELECTRIC RELIABILITY)
COUNCIL OF TEXAS, INC.) OF
FOR A DEBT OBLIGATION)
ORDER UNDER PURA) TEXAS
CHAPTER 39, SUBCHAPTER N)**

**MOTION TO INTERVENE
OF DC ENERGY TEXAS, LLC**

Pursuant to Procedural Rules 22.103(b) and 22.104 of the Public Utility Commission of Texas (“Commission”), DC Energy Texas, LLC (“DC Energy”) hereby files this motion to intervene in the above-captioned proceeding. DC Energy is registered as a Qualified Scheduling Entity (“QSE”) and Congestion Revenue Rights Account Holder (“CRRAH”) with the Electric Reliability Council of Texas (“ERCOT”) and regularly participates in ERCOT’s Day-Ahead Market (“DAM”) and Congestion Revenue Right (“CRR”) auctions. In the instant proceeding, ERCOT proposes to collect Default Charge payments from QSEs and CRR Account Holders, including DC Energy. Therefore, DC Energy has standing to intervene pursuant to 16 TAC § 22.103(b) because it has justiciable interests that may be adversely affected by the outcome of this proceeding.

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

Joelle K. Ogg
General Counsel
Justin R. Cockrell
Assistant General Counsel
DC Energy Holdings, LLC
1600 Tysons Boulevard
Fifth Floor
McLean, Virginia 22102
Phone: 703.506.3901
Fax: 703.506.3905
ogg@dc-energy.com
cockrell@dc-energy.com

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

Respectfully submitted,

/s/ Justin R. Cockrell

Joelle K. Ogg
General Counsel
Justin R. Cockrell
Assistant General Counsel
DC Energy Holdings, LLC
1600 Tysons Boulevard
Fifth Floor
McLean, Virginia 22102
Phone: 703.506.3901
Fax: 703.506.3905
ogg@dc-energy.com
cockrell@dc-energy.com

Counsel to DC Energy Texas, LLC

Dated July 23, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of July, 2021, a true and correct copy of the foregoing document was served on all parties of record in this proceeding by electronic mail, pursuant to the Public Utility Commission of Texas Order Suspending Rules, issued in PUC Docket No. 50664 on March 16, 2020.

/s/ Justin R. Cockrell

Justin R. Cockrell
Assistant General Counsel
DC Energy Holdings, LLC
1600 Tysons Boulevard
Fifth Floor
McLean, Virginia 22102
Phone: 703.506.3901
Fax: 703.506.3905
cockrell@dc-energy.com

Counsel to DC Energy Texas, LLC