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DOCKET NO. 52322

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

LUBBOCK POWER & LIGHT’S STATEMENT OF POSITION

The City of Lubbock, acting by and through Lubbock Power & Light, its municipally-owned electric utility (LP&L), files this Statement of Position in lieu of testimony in the above-captioned docket. In support thereof, LP&L would show the following:

LP&L supports the entry of a Debt Obligation Order that complies with the Public Utility Regulatory Act as amended by House Bill 4492, Act of June 16, 2021, 87th Leg., R.S., 2021 Tex. Sess. Law Serv. Ch. 908 (VERNON’S) (PURA).¹ Section 39.151(j-1) of PURA exempts LP&L from paying the uplift charges assessed to load serving entities as provided in PURA § 39.653(c). In the alternative, LP&L is a municipally owned utility that is authorized to opt out of the uplift charges pursuant to PURA § 39.653(d).

LP&L reserves the right to amend or supplement this position after review of the evidence and positions of other parties regarding the proposed Debt Obligation Order and as this docket progresses. LP&L reserves the right to take further action in this proceeding, including participating via cross-examination at hearing and through briefing to further assure the Commission’s issues specific to LP&L are fully addressed.

¹ Tex. Util. Code §§ 11.001–66.016

Respectfully submitted,
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**ATTORNEYS FOR CITY OF LUBBOCK,
ACTING BY AND THROUGH LUBBOCK
POWER & LIGHT**

CERTIFICATE OF SERVICE

In accordance with Order No. 2 in this docket, filing a document on the Commission's Interchange website constitutes service of the document on all parties to this proceeding.

/s/ Lambeth Townsend

LAMBETH TOWNSEND