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PUC DOCKET NO. 52322

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

**MOTION TO INTERVENE OF LOWER COLORADO RIVER AUTHORITY AND
LCRA WSC ENERGY**

Lower Colorado River Authority and LCRA WSC Energy (collectively LCRA) file this motion to intervene in the above-referenced proceeding pursuant to 16 Tex. Admin. Code (TAC) §§ 22.103 and 22.104, and in support respectfully show as follows:

I. STANDING TO INTERVENE

LCRA provides wholesale electricity to electric cooperatives and municipalities within the Electric Reliability Council of Texas (ERCOT) region. LCRA serves as a Qualified Scheduling Entity that will be affected by the financing order sought in this docket. Therefore, LCRA has a justiciable interest that may be adversely affected by the outcome of this proceeding and respectfully requests that the Commission grant this motion.

II. AUTHORIZED REPRESENTATIVES

The names, address, and telephone number of LCRA's authorized representatives are:

Leigh Sebastian
Emily R. Jolly
Lower Colorado River Authority
P. O. Box 220
Austin, TX 78767
Telephone: (512) 578-3200
Email: Leigh.Sebastian.lcra.org
Email: Emily.Jolly@lcra.org

All pleadings, correspondence, notices, or other documents should be served on LCRA's authorized representatives.

III. CONCLUSION AND PRAYER

LCRA respectfully requests that it be granted intervenor status to participate as a party in this proceeding and for any other relief to which it is entitled.

Respectfully submitted,



Leigh Sebastian
State Bar No. 24027843
Managing Associate General Counsel
Emily R. Jolly
State Bar No. 24057022
Associate General Counsel
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P. O. Box 220
Austin, Texas 78767
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Leigh.Sebastian@lcra.org
Emily.Jolly@lcra.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served to all parties of record in this proceeding in accordance with the Commission's order in Docket No. 50664 suspending 16 TAC § 22.74 on this 26th day of July, 2021.



Emily R. Jolly