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Received - 2021-08-18 12:57:41 PM

Control Number - 52322

ItemNumber - 181

PUC DOCKET NO. 52322

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

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.’S RESPONSE TO
SOUTH TEXAS ELECTRIC COOPERATIVE’S MOTION TO INTERVENE**

Electric Reliability Council of Texas, Inc. (“ERCOT”) files this response to South Texas Electric Cooperative’s (“STEC”) Motion to Intervene, which was filed on August 18, 2021. ERCOT does not object to STEC’s late-filed intervention as long as STEC’s participation in the hearing on the merits is limited to the process for opting out of the Subchapter N securitization provisions, which is the sole ground STEC articulates as justification for its late-filed intervention.

If STEC intends to address issues other than the opt-out process during the hearing on the merits, its request for a good cause exception to the intervention deadline should be denied. Parties will be prejudiced by STEC’s failure to file a statement of position and the lack of any opportunity to conduct discovery on whatever positions STEC might advocate during the hearing.

For these reasons, ERCOT requests that the Administrative Law Judge condition STEC’s intervention on its commitment that it will not address any issue in the hearing on the merits other than the opt-out process.

WINSTEAD PC

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CERTIFICATE OF SERVICE

This document was filed on the Commission's Interchange website on August 18, 2021. 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/ Ron H. Moss
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