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Received - 2021-09-20 04:41:02 PM

Control Number - 52322

ItemNumber - 292

DOCKET NO. 52322

**APPLICATION OF THE ELECTRIC §
RELIABILITY COUNCIL OF TEXAS, §
INC. FOR A DEBT OBLIGATION ORDER §
TO FINANCE UPLIFT BALANCES §
UNDER PURA CHAPTER 39, §
SUBCHAPTER N, FOR AN ORDER §
INITIATING A PARALLEL DOCKET, §
AND FOR A GOOD CAUSE EXCEPTION §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

JOINT MOTION TO APPROVE UNOPPOSED PARTIAL STIPULATION

On behalf of the Signatories to the Unopposed Partial Stipulation, Just Energy Texas LP, NRG Energy, Inc., Luminant Energy Company LLC, TXU Load-Serving Entities(TXU Energy Retail Company LLC, Ambit Texas, LLC, Luminant ET Services Company LLC, TriEagle Energy LP, and Value Based Brands LLC dba 4Change Energy, Express Energy, and Veteran Energy) (collectively “Movants”) file this Joint Motion to Approve the Unopposed Partial Stipulation. All parties to this proceeding have signed onto or are unopposed to the Unopposed Partial Stipulation and Settlement Agreement (“Stipulation”). The parties listed on Attachment A to the Stipulation reflect those that have signed on (collectively the “Signatories”) and include, among others, every party that submitted testimony in this proceeding. By this Stipulation, the Signatories have resolved many of the most disputed issues in this docket. No party opposes the Stipulation. The City of Georgetown has taken no position, however, counsel for the City of Georgetown has represented that the issue of the city’s position on the Stipulation will be taken up by the Georgetown city council at its next meeting, expected to take place on September 28, 2021.

In addition, the parties are preparing testimony which will be filed in support of the Stipulation, to provide evidentiary details and an explanation of the benefits of the settlement terms. Accordingly, on behalf of themselves and the Signatories, Movants respectfully request that the Public Utility Commission of Texas approve the Stipulation, including its attachments. Movants request any further relief to which the Signatories may be entitled.

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Respectfully submitted,



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/s/ William A. Moore

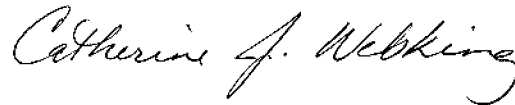
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CERTIFICATE OF SERVICE

I certify that on September 20, 2021 this instrument was filed with the Public Utility Commission of Texas and a true and correct copy of it was served on all parties of record in this proceeding via interchange.



Andrea Moore Stover