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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	§	

CITY OF SEGUIN'S MOTION TO INTERVENE

The City of Seguin, whose municipally owned electric utility operates under the name of City of Seguin Electric Department (“Seguin”), files this Motion to Intervene in the above-referenced proceeding pursuant to 16 Tex. Admin. Code (TAC) §§ 22.103 and 22.104, and in support thereof, respectfully shows the following:

I. INTRODUCTION

On July 16, 2021, the Electric Reliability Council of Texas (ERCOT) filed the application for a debt obligation order under PURA Chapter 39, Subchapter N. On July 20, 2021, the Public Utility Commission of Texas (Commission) issued Order No. 1, which set an intervention deadline of July 27, 2021.¹ This motion is timely filed.

II. JUSTICIABLE INTEREST

In its application, ERCOT states that all wholesale market participants in ERCOT will be affected by the Debt Obligation Order requested in its application.² The issues addressed in ERCOT’s application concern uplift balance financing and uplift charges to be allocated to and collected from market participants. Seguin is a market participant in ERCOT. Therefore, Seguin has a justiciable interest that may be adversely affected by the outcome of this proceeding.

¹ Order No. 1 Entering Protective Order, Requiring Commission Staffs Recommendations, Adopting a Procedural Schedule, Notifying the Parties of a Preheating Conference, and Discussing Other Procedural Matters at 2 (Jul. 20, 2021).

² Application at 5 (Jul. 16, 2021).

III. DESIGNATION OF REPRESENTATIVE

The address and telephone number of Seguin's authorized legal representative is as follows:

Andrew Quittner
City Attorney
205 N. River Street
Seguin, Texas 78155
Telephone: (830) 401-2775
Facsimile: (830) 401-2499
E-Mail: aquittner@seguintexas.gov

Seguin requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served on Seguin's authorized representative.

IV. PRAYER

Seguin respectfully asserts that it has a justiciable interest in this proceeding and prays that its Motion to Intervene be granted and that it be afforded full party status in this matter.

Respectfully submitted,

City of Seguin
205 N. River Street
Seguin, Texas 78155
Telephone: (830) 401-2775
Facsimile: (830) 401-2499

/s/ Andrew Quittner

ANDREW QUITTNER
State Bar No. 16439975
E-Mail: aquittner@seguintexas.gov

ATTORNEY FOR THE CITY OF SEGUIN

CERTIFICFATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on July 27, 2021, in accordance with the Order Suspending Rules, issued in project No. 50664.

/s/ Andrew Quittner
ANDREW QUITTNER