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**APPLICATION OF ELECTRIC §  
RELIABILITY COUNCIL OF TEXAS, INC. § PUBLIC UTILITY COMMISSION  
FOR A DEBT OBLIGATION ORDER §  
PURSUANT TO CHAPTER 39, §  
SUBCHAPTER N, OF THE PUBLIC § OF TEXAS  
UTILITY REGULATORY ACT §**

**CITIGROUP ENERGY INC.'S MOTION TO INTERVENE**

Citigroup Energy Inc. ("CEI"), pursuant to Public Utility Commission of Texas Procedural Rules 16 Tex. Admin. Code TAC §22.103(b) and §22.104, hereby moves to intervene in the above-captioned proceeding. In support of its Motion to Intervene, CEI respectfully avers as follows:

1. The names, addresses, and telephone numbers of CEI's authorized representatives are:

Jeffrey A. Gollomp  
State Bar No. 24068438  
Director and General Counsel  
Citigroup Energy Inc.  
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All pleadings and other documents should be served upon CEI's authorized representatives.

2. CEI is a market participant in the Electric Reliability Council of Texas, Inc. (“ERCOT”) market. Specifically, CEI acts as a Qualified Scheduling Entity (“QSE”) for its own account and maintains various QSE sub-accounts. CEI also is a Congestion Revenue Right Account Holder (“CRRRAH”). ERCOT stated that its Application for a Debt Obligation Order to Finance Uplift Balances Under PURA Chapter 39, Subchapter N (“Application”) will “affect all wholesale market participants.”<sup>1</sup> Accordingly, as a wholesale market participant, CEI has a justiciable interest that may be adversely affected by the outcome of this proceeding.

For the foregoing reasons, CEI respectfully requests that this Motion to Intervene be granted, that CEI be granted party status as an intervenor in this proceeding for all purposes, and that CEI be awarded such other relief to which it may be justly entitled.

Respectfully submitted,

/s/ Jennifer Hardy

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**ATTORNEYS FOR CITIGROUP ENERGY INC.**

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<sup>1</sup> Application at 5.

## CERTIFICATE OF SERVICE

I, Jennifer Hardy, Attorney for Citigroup Energy Inc., hereby certify that a true and correct copy of this document was served by e-mail on all parties of record in this proceeding on this 27<sup>th</sup> day of July, 2021 in accordance with the Second Order Suspending Rules issued in Project No. 50664.

*/s/ Jennifer Hardy*

Jennifer Hardy