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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, FOR AN ORDER §
INITIATING A PARALLEL DOCKET, §
AND FOR A GOOD CAUSE EXCEPTION §**

MOTION TO INTERVENE OF TEXPO POWER LP

Texpo Power LP (“Texpo”) file this Motion to Intervene in the above-styled proceeding in accordance with Order No. 1 and 16 Tex. Admin. Code (TAC) §§ 22.102-22.104. Order No. 1 establishes the intervention deadline as July 27, 2021, and, therefore, this Motion is timely filed. In support thereof, Texpo respectfully shows as follows:

I. AUTHORIZED REPRESENTATIVES

The contact information for Texpo’s authorized representatives is as follows:

James Guy
Deacon Law Group PLLC
913 Main St.
Bastrop, Texas 78602
(512) 576-2435 (Telephone)
jamesguy@deaconlawgroup.com

All pleadings and other documents should be served upon Texpo’s authorized representatives.

II. TEXPO’S INTEREST

On July 16, 2021, Electric Reliability Council of Texas, Inc. (ERCOT) filed an application for a debt obligation order to finance uplift balances pursuant to Chapter 39, Subchapter N of the Public Utility Regulatory Act. In its application, ERCOT states that all wholesale market participants in ERCOT will be affected by the Debt Obligation Order requested in its application. EDES is registered as a Qualified Scheduling Entity (QSE), Congestion Revenue Rights Account

Holder (CRRAH), and Load Serving Entity (LSE), and regularly participates in the ERCOT market. The issues addressed in ERCOT's application concern uplift balance financing and uplift charges to be allocated to and collected from market participants.

Accordingly, Texpo has a justiciable interest in the outcome of this proceeding and should be admitted as an intervenor.

III. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Texpo respectfully requests that the Commission grant this Motion to Intervene, admit Texpo as an intervenor in this proceeding for all purposes, and grant Texpo such other relief to which it may be justly entitled.

Respectfully submitted,



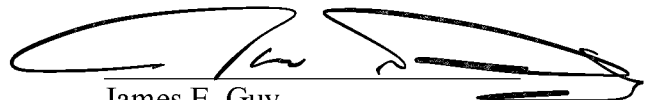
James E. Guy
State Bar No. 24027061
DEACON LAW GROUP PLLC
913 Main St.
Bastrop, Texas 78602
(512) 576-2435 (Telephone)
jamesguy@deaconlawgroup.com

Attorney for Texpo Power LP

July 27, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties by email on the 27th day of July, 2021.



James E. Guy