



## Filing Receipt

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**DOCKET NO. 52322**

**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 §**

**EAST TEXAS ELECTRIC COOPERATIVE, INC.’S  
MOTION TO INTERVENE**

East Texas Electric Cooperative, Inc. (“ETEC”) files this Motion to Intervene and in support thereof would show the following:

**I. APPLICATION BACKGROUND**

On July 16, 2021, the Electric Reliability Council of Texas, Inc. (“ERCOT”) filed the above-referenced application with the Public Utility Commission of Texas (“Commission”) related to the securitization of certain costs in compliance with HB 4492.

**II. ETEC BACKGROUND AND JUSTICIABLE INTEREST**

ETEC is a generation and transmission electric cooperative directly serving seven distribution cooperatives and one generation and transmission cooperative. ETEC and certain cooperative members are Load Serving Entities in ERCOT and ETEC is a Congestion Revenue Rights Account Holder.<sup>1</sup> As a result of its status as a Market Participant in ERCOT, ETEC and certain members may be affected by the outcome of this proceeding. Thus, ETEC has a justiciable interest in this proceeding and is entitled to intervene in this docket in accordance with 16 Texas Administrative Code (“TAC”) § 22.103 and § 22.104.

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<sup>1</sup> For example, ETEC holds certain Pre-Assigned Congestion Revenue Rights (“PCRRs”), as described on ERCOT’s PCRR eligibility list, available at: <http://www.ercot.com/mktinfo/crr>.

### III. ETEC'S REPRESENTATIVE

The name, address and telephone number of the ETEC's representative is as follows:

AJ Goff, Interim CEO/General Manager  
East Texas Electric Cooperative, Inc.  
P.O. Box 631623  
Nacogdoches, Texas 75963-1623  
(936) 560-9532

### IV. ETEC'S LEGAL REPRESENTATIVES

The name, address and telephone number of the East Texas Cooperatives' legal authorized representatives are as follows:

Mark C. Davis  
Adrienne M. Waddell  
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ETEC requests the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents upon said legal representatives.

### V. CONCLUSION AND PRAYER

As discussed above, ETEC may be affected by the outcome of this proceeding and thus has a justiciable interest in this proceeding. ETEC has standing to intervene under 16 TAC § 22.103 and § 22.104.

**WHEREFORE, PREMISES CONSIDERED**, the ETEC respectfully moves to intervene in this docket, as a party with all rights thereof. ETEC also requests all relief to which it may show itself entitled.

Respectfully submitted,

/s/ Jacob Lawler

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**ATTORNEYS FOR EAST TEXAS ELECTRIC  
COOPERATIVE, INC.**

**CERTIFICATE 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/ Jacob Lawler

Jacob Lawler