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PUC 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 §

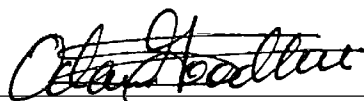
OFFICE OF PUBLIC UTILITY COUNSEL'S
MOTION TO INTERVENE

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a)(3)(A)-(B), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of the residential and small commercial consumers in Texas. OPUC's Interim Public Counsel has determined that residential and small commercial consumers in Texas are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute.

Dated: July 27, 2021

Respectfully submitted,

Chris Ekoh
Interim Public Counsel
State Bar No. 06507015



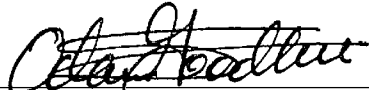
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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
PUC DOCKET NO. 52322

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 27th day of July 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.



Adam Goodlett