



## Filing Receipt

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**APPLICATION OF THE  
ELECTRIC RELIABILITY  
COUNCIL OF TEXAS,  
INC. FOR A DEBT OBLIGATION  
ORDER TO FINANCE UPLIFT  
BALANCES UNDER PURA,  
CHAPTER 39, SUBCHAPTER N,  
FOR AN ORDER INITIATING A  
PARALLEL DOCKET, AND FOR A  
GOOD CAUSE EXCEPTION**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**MOTION TO INTERVENE OF VITOL INC.**

Pursuant to Procedural Rules 22.103(b) and 22.104 of the Public Utility Commission of Texas (“Commission”), Vitol Inc. (“Vitol”) hereby files this motion to intervene in the above-captioned proceeding. Vitol is registered as Qualified Scheduling Entities (“QSE”) for load serving entities (“LSEs”), is a Congestion Revenue Rights Account Holder (“CRRAH”) with the Electric Reliability Council of Texas (“ERCOT”) and is a regular participant in the ERCOT day-ahead and Congestion Revenue Right (“CRR”) auction markets.

In this proceeding, ERCOT proposes to assess the exposure of LSEs in order to calculate the ultimate costs to be included in the Uplift Balance. Accordingly, Vitol may be required to pay ERCOT those uplift charges levied on LSEs on a load ratio share basis. Accordingly, Vitol has standing to intervene under Section 22.103(b) of Title 16 of the Texas Administrative Code since Vitol has justiciable interests which may be adversely affected by the outcome of this proceeding.

Vitol requests that all notices, correspondence, pleadings, requests and responses for information, and other documents submitted in this proceeding be served upon the following authorized representatives for Vitol:

Averill Conn  
Vitol Inc.  
2925 Richmond Avenue  
11th Floor  
Houston, TX 77098  
Phone: (713) 230-1049  
[acn@vitol.com](mailto:acn@vitol.com)

Kenneth W. Irvin  
Terence T. Healey  
Casey Khan  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
Phone: (202) 736-8256  
[kirvin@sidley.com](mailto:kirvin@sidley.com)  
[thealey@sidley.com](mailto:thealey@sidley.com)  
[ckhan@sidley.com](mailto:ckhan@sidley.com)

Attorneys for Vitol Inc.

For the foregoing reasons, Vitol Inc. respectfully requests that it be granted leave to intervene in the above-captioned proceeding.

Respectfully submitted,

/s/ Casey Khan

**Casey Khan**  
Counsel  
State Bar No. 24070053  
1000 Louisiana Street,  
Suite 5900  
Houston, TX 77002  
Phone: (713) 495-4545  
[ckhan@sidley.com](mailto:ckhan@sidley.com)  
Attorney for Vitol Inc.

**CERTIFICATE OF SERVICE**

I certify that on July 27, 2021 this motion to intervene was filed with the Public Utility Commission of Texas and a true and correct copy of it was served on all parties of record in this proceeding by e-mail.

/s/ Casey Khan

**Casey Khan**  
Counsel  
State Bar No. 24070053  
1000 Louisiana Street,  
Suite 5900  
Houston, TX 77002  
Phone: (713) 495-4545  
[ckhan@sidley.com](mailto:ckhan@sidley.com)  
Attorney for Vitol Inc.