



Filing Receipt

Received - 2021-07-19 02:46:08 PM

Control Number - 52322

ItemNumber - 4

PUC DOCKET NO. 52322

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

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers (“TIEC”), pursuant to the Public Utility Regulatory Act (“PURA”), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission’s Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of TIEC’s authorized representatives are:

Katherine L. Coleman
Michael A. McMillin
John R. Hubbard
O'Melveny & Myers LLP
500 W 2nd Street, Suite 1900
Austin, TX 78701
(737) 261-8600
kcoleman@omm.com
mmcmillin@omm.com
jhubbard@omm.com
ommeservice@omm.com

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

2. TIEC is an association of industrial consumers of electricity, and TIEC’s principal purpose is to address electricity matters in proceedings before the Commission.

3. On July 16, 2021, Electric Reliability Council of Texas, Inc. (“ERCOT”) filed an application for a debt obligation order pursuant to Chapter 39, Subchapter N, of the Public Utility Regulatory Act.

4. Because TIEC member companies own and operate industrial facilities who will ultimately bear these charges and/or may be eligible to receive a refund of the charges, TIEC members will be impacted by any determinations the Commission may make regarding ERCOT's application.

For the above stated reasons, TIEC respectfully requests that the Commission grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Katie Coleman

Katherine L. Coleman
State Bar No. 24059596
Michael A. McMillin
State Bar No. 24088034
John R. Hubbard
State Bar No. 24120909
069865
500 W 2nd Street, Suite 1900
Austin, TX 78701
(737) 204-4720
kcoleman@omm.com
mmcmillin@omm.com
jhubbard@omm.com
OMMeservice@omm.com

**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 19th day of July, 2021 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard