



## Filing Receipt

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<b>APPLICATION OF THE ELECTRIC</b>	<b>§</b>	<b>PUBLIC UTILITY</b>
<b>RELIABILITY COUNCIL OF TEXAS, INC.</b>	<b>§</b>	<b>COMMISSION OF TEXAS</b>
<b>FOR A DEBT OBLIGATION ORDER</b>	<b>§</b>	
<b>UNDER PURA CHAPTER 39,</b>	<b>§</b>	
<b>SUBCHAPTER N, AND FOR A GOOD</b>	<b>§</b>	
<b>CAUSE EXCEPTION</b>	<b>§</b>	

**MOTION TO INTERVENE OF LPT LLC**

LPT LLC (“LPT LLC”) files this Motion to Intervene in the above-captioned proceeding pursuant to 16 Tex. Admin Code (“TAC”) §§ 22.103 and 22.104.

The name, address and telephone number of Movant is:

LPT LLC  
2100 W. Cypress Creek Road, Suite 130  
Fort Lauderdale, FL 33309

The name, address and telephone number of LPT LLC's authorized representative and counsel for service of all documents and pleadings with respect to this matter is

Stephen Gibelli  
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On July 16, 2021, the Electric Reliability Council of Texas (“ERCOT”) filed its Application for a Debt Obligation Order to Finance Uplift Balances under PURA Chapter 39, Subchapter N, for an Order Initiating a Parallel Docket, and for Good Cause Exception (“Uplift Application”). The issues addressed in the Uplift Application concern uplift balance financing and uplift charges to be allocated to and collected from market participants. LPT LLC is a licensed electric supplier who may be adversely impacted by the relief requested by ERCOT. Accordingly, LPT LLC has a justiciable interest in this proceeding.

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

Respectfully submitted,

*Stephen Gibelli*

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