



## Filing Receipt

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**DOCKET NO. 52322**

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

**CITY OF GEORGETOWN’S RESPONSE TO COMMISSION STAFF’S  
RECOMMENDATION**

The City of Georgetown (Georgetown) files this response to the Public Utility Commission of Texas (Commission) Staff’s recommendation on the Electric Reliability Council of Texas’ (ERCOT) application for a debt obligation order. This response is timely filed pursuant to Order No. 1.<sup>1</sup>

Georgetown supports Commission Staff’s recommendation to open a parallel proceeding. However, both the deadlines for opting-out and for submitting documentation on exposure to uplift costs should not be on the same day. Georgetown instead requests that the deadline for opting-out be seven days after the deadline for documenting exposure. This would provide load-serving entities (LSEs) time to evaluate all the exposure filings and better assess their potential liability for uplift charges. The LSEs could then make a more informed decision on whether to opt-out. This extension would not affect the contemplated timeline for ERCOT to complete its review of the exposure filings, and still provides plenty of time to calculate and file the total amount to be financed by December 30, 2021.

For these reasons, Georgetown respectfully requests that the Commission set a deadline for opting-out that is seven days after the deadline to submit documentation on exposure to uplift costs.

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<sup>1</sup> Order No. 1 Entering Protective Order, Requiring Commission Staff’s Recommendations, Adopting a Procedural Schedule, Notifying the Parties of a Prehearing Conference, and Discussing Other Procedural Matters at 3 (Jul. 20, 2021).

Respectfully submitted,  
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/s/ Lambeth Townsend

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**ATTORNEYS FOR CITY OF GEORGETOWN**

**CERTIFICATE OF SERVICE**

In accordance with Order No. 2 in this docket, filing a document on the Commission's Interchange website constitutes service of the document on all parties to this proceeding.

/s/ Lambeth Townsend

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LAMBETH TOWNSEND