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Received - 2021-07-22 10:06:24 AM
Control Number - 52322
ItemNumber - 9

DOCKET NO. 52322

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

NRG ENERGY, INC.'S MOTION TO INTERVENE

NRG Energy, Inc. ("NRG") files this motion to intervene in the above-referenced proceeding and in support thereof would respectfully show as follows:

1. The names, address, and telephone number of NRG's representatives for this proceeding are:

Andrea Stover	Kristina F. Rollins
State Bar No. 24046924	State Bar No. 24033012
98 San Jacinto Blvd #1500	NRG Energy, Inc.
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All pleadings and other documents should be served upon NRG's authorized representatives.

2. NRG owns and operates Qualified Scheduling Entities ("QSEs") representing retail electric providers ("REPs") that actively participate in the ERCOT market. NRG's REPs are Load Serving Entities ("LSEs") that provide retail electric service to customers in the areas of state that are open to retail competition. ERCOT's requested relief in this docket will impact QSEs and LSEs, as will ERCOT's request for a parallel proceeding to determine the amount of exposure experienced by LSEs in order to calculate the costs that will ultimately be included in the Uplift Balance. As such, NRG has standing to intervene under 16 TAC § 22.103(b) because its justiciable interests may be adversely affected by the outcome of this proceeding.

NRG respectfully asks the administrative law judge to grant this motion to intervene and admit NRG as an intervenor in this proceeding.

Respectfully submitted,


BAKER BOTTS L.L.P.

NRG Energy, Inc.

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ATTORNEYS FOR NRG ENERGY, INC.

CERTIFICATE OF SERVICE

I certify that on July 22, 2021 this instrument 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.


Andrea Moore Stover