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DOCKET NO. 52364

PROCEEDING FOR ELIGIBLE	§	BEFORE THE
ENTITIES TO FILE AN OPT OUT	§	
PURSUANT TO PURA § 39.653(d) AND	§	
FOR LOAD-SERVING ENTITIES TO	§	PUBLIC UTILITY COMMISSION
FILE DOCUMENTATION OF	§	
EXPOSURE TO COSTS PURSUANT	§	
TO THE DEBT OBLIGATION ORDER	§	
IN DOCKET NO. 52322	§	OF TEXAS

CITY OF COLLEGE STATION’S MOTION TO INTERVENE

COMES NOW, the City of College Station (College Station) and files this Motion to Intervene in the above-referenced proceeding pursuant to the Public Utility Regulatory Act (PURA),¹ and 16 Tex. Admin. Code (TAC) §§ 22.103 and 22.104. In support of its Motion, College Station shows as follows:

1. College Station is a municipally-owned utility and a load-serving entity that participates in the Electric Reliability Council of Texas (ERCOT) market.
2. On July 28, 2021, Staff for the Public Utility Commission of Texas opened this Proceeding for Eligible Entities to File and Opt Out Pursuant to PURA § 39.653(d) and for Load-Serving Entities to File Documentation of Exposure to Costs Pursuant to the Debt Obligation Order in Docket No. 52322.
3. College Station may be assessed uplift charges under PURA § 39.653(c) and will need to either document its exposure to uplift costs or opt out of the uplift charges under PURA § 39.653(d). College Station therefore has a justiciable interest that will be affected by the outcome of this proceeding.
4. College Station’s authorized representatives in this matter are:

Thomas L. Brocato
Taylor P. Denison
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
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¹ Tex. Util. Code §§ 11.001–66.016 (PURA).

College Station Requests that all correspondence, pleadings, and other documents in this proceeding be served upon College Station's authorized representatives.

WHEREFORE PREMISES CONSIDERED, College Station respectfully requests that this Motion to Intervene be granted.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

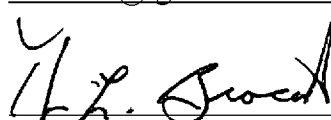
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THOMAS L. BROCATO

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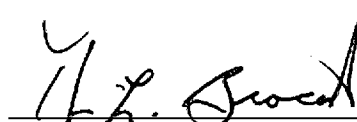
TAYLOR P. DENISON

State Bar No. 21446344

**ATTORNEYS FOR
CITY OF COLLEGE STATION**

CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on August 18, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



THOMAS L. BROCATO