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(DOCKET NO. 52364

PROCEEDING FOR ELIGIBLE ENTITIES TO FILE AN 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	§ § § § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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LUBBOCK POWER & LIGHT’S MOTION TO INTERVENE

The City of Lubbock, acting by and through Lubbock Power & Light (LP&L), 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 thereof, LP&L respectfully shows the following:

1. LP&L is a municipally owned utility and a load-serving entity that participates in the Electric Reliability Council of Texas market.

2. On July 28, 2021, Staff for the Public Utility Commission of Texas opened this Proceeding for Eligible Entities to File an 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. In accordance with PURA § 39.151(j–1), LP&L is exempt from being assessed uplift charges under PURA § 39.653(c). Despite this statutory exemption, and without waiving any arguments in support, LP&L additionally seeks to opt out of the uplift charges under PURA § 39.653(d). LP&L therefore has a justiciable interest that may be affected by the outcome of this proceeding.

4. The address and telephone number of LP&L’s authorized legal representatives are as follows:

¹ Tex. Util. Code §§ 11.001–66.016 (PURA).

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LP&L requests that all correspondence, pleadings, and other documents in this proceeding be served upon LP&L's authorized representatives.

For the above stated reasons, LP&L respectfully requests that the Commission grant this Motion to Intervene and afford LP&L full party status in this proceeding.

Respectfully submitted,
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/s/ Lambeth Townsend

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**ATTORNEYS FOR THE CITY OF LUBBOCK,
ACTING BY AND THROUGH LUBBOCK
POWER & LIGHT**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 19, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Lambeth Townsend

LAMBETH TOWNSEND