



## Filing Receipt

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**PUC DOCKET NO. 52364**

**PROCEEDING FOR ELIGIBLE § PUBLIC UTILITY COMMISSION  
ENTITIES TO FILE AN OPT OUT §  
PURSUANT TO PURA SECTION §  
39.653(d) AND FOR LOAD-SERVING § OF TEXAS  
ENTITIES TO FILE §  
DOCUMENTATION OF EXPOSURE §  
TO COSTS PURSUANT TO THE §**

**TENASKA POWER SERVICES CO.'S, TPS I'S, TPS II'S, TPS III'S, TPS IV'S, TENASKA  
TOPS REP LP'S, TOPS I'S, TOPS 5'S, TOPS 6'S, AND TOPS 7'S MOTION TO  
INTERVENE**

Tenaska Power Services Co. ("TPS"), TPS I, TPS II, TPS III, TPS IV, Tenaska TOPS REP LP ("Tenaska TOPS"), TOPS I, TOPS 5, TOPS 6, and TOPS 7 (collectively, "TPS Intervenors") move to intervene in the above-styled proceeding pursuant to the Public Utility Regulatory Act ("PURA"), Tex. Util. Code Ann. §§ 11.001 et seq., 16 Tex. Admin. Code ("TAC") §§ 22.101, 22.103(b) and 22.104. TPS Intervenors would show as follows:

1. The name, address, and telephone number of TPS Intervenors' authorized representative is:

Keith Emery  
Vice President  
Tenaska Power Services Co.  
300 East John Carpenter Freeway, Suite 1100  
Irving, Texas 75062  
Direct: (817) 303-1870  
Email: KEmery@tnsk.com

All pleadings and other documents should be served upon TPS Intervenors' authorized representative.

2. On July 28, the Public Utility Commission of Texas ("Staff") filed an application for Eligible Entities to File an Opt Out Pursuant to PURA Section 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. TPS is a QSE and an Option II Retail Electric Provider (“REP”) that participates in the ERCOT retail market. TPS I, TPS II, TPS III, and TPS IV are affiliated “d/b/a” entities of TPS. Tenaska TOPS is also an Option II REP that participates in the ERCOT retail market. TOPS I, TOPS 5, TOPS 6, and TOPS 7 are affiliated “d/b/a” entities of Tenaska TOPS. As such, TPS Intervenor possess a justiciable interest that may be adversely affected by the outcome of this proceeding.

In recognition of its justiciable interest, TPS Intervenor request that the Commission grant this Motion to Intervene and admit TPS, TPS I, TPS II, TPS III, TPS IV, Tenaska TOPS, TOPS I, TOPS 5, TOPS 6, and TOPS 7 as intervenors in this proceeding for all purposes, and for such other relief to which they may be justly entitled.

Respectfully submitted,

*Keith E. Emery*

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**AUTHORIZED REPRESENTATIVE FOR:  
TPS INTERVENORS**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on the 3rd day of September, 2021 in accordance with the Order Suspending Rules, issued in Project No. 50664.

*Keith C. Emery*

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