



## Filing Receipt

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**PUC DOCKET NO. 52364**

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

**MOTION TO INTERVENE OF**  
**RAYBURN COUNTRY ELECTRIC COOPERATIVE, INC.**

Rayburn Country Electric Cooperative, Inc. (“Rayburn”) files this Motion to Intervene in the above-referenced proceeding pursuant to 16 Tex. Admin. Code (“TAC”) §§ 22.103 and 22.104, and in support thereof, respectfully shows as follows:

**I. STANDING TO INTERVENE**

Rayburn is a Texas-based not-for-profit generation and transmission electric cooperative that, through its four members, provides power to approximately 225,000 consumers — of which about 90% are residential consumers — in Northeast Texas. Rayburn serves as a Qualified Scheduling Entity and Load Serving Entity in the Electric Reliability Council of Texas, is a party in Docket 52322 before the Public Utility Commission of Texas (“Commission” or “PUC”) and is contemplating opting-out of the uplift securitization pursuant to House Bill 4492.<sup>1</sup> Therefore, Rayburn has a judicable interest that may be adversely affected by the outcome of this proceeding<sup>2</sup> and respectfully requests that the Commission grant this motion.

**II. AUTHORIZED REPRESENTATIVES**

The name, address and telephone number of Rayburn’s authorized representatives are:

David Naylor  
Jennifer Edmondson

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<sup>1</sup> See generally PURA §§ 39.651-39.653.

<sup>2</sup> Rayburn files this intervention without waiver or admission of any kind as to the PUC’s jurisdiction over its claims and defenses, and with full reservation of those claims and defenses.

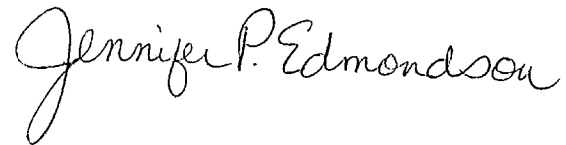
Rayburn Country Electric Cooperative, Inc.  
950 Sids Road  
Rockwall, TX 75032  
Telephone: (469) 402-2100  
Email: dnaylor@rayburnelectric.com  
Email: jedmondson@rayburnelectric.com

All pleadings, correspondence, notices, or other documents should be served on Rayburn's authorized representatives.

### **III. CONCLUSION AND PRAYER**

Rayburn respectfully requests that it be granted intervenor status to participate as a party in this proceeding and for any other relief to which it is entitled.

Respectfully submitted,



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Jennifer Edmondson  
State Bar No. 24070457  
General Counsel  
Rayburn Electric Country, Inc.  
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Rockwall, TX 75032  
Telephone: (469) 402-2100  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served to all parties of record in this proceeding in accordance with the Commission's order in Docket No. 50664 suspending 16 TAC § 22.74 on this 10th day of September, 2021.

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Jennifer Edmondson