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**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**

MOTION TO INTERVENE OF AVANGRID RENEWABLES, LLC

Avangrid Renewables, LLC (“Avangrid Renewables”) files this motion to intervene in the above-captioned proceeding, and shows the following in support thereof:

1. The names, addresses, and telephone numbers of the representatives of Avangrid Renewables in this proceeding are:

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State Bar No. 00787037
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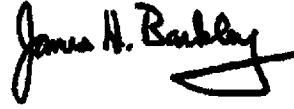
All pleadings and other documents in this proceeding should be served upon each of the above individuals.

2. Avangrid Renewables acted as the Qualified Scheduling Entity ("QSE") for its affiliate Iberdrola Solutions, LLC, a retail electric provider ("REP") and load serving entity ("LSE"), which was certified as a REP on July 9, 2019, and operated until June 30, 2021. Pursuant to PURA § 39.653 and the debt obligation order issued in Docket No. 52322, LSEs will be required to submit documentation of their exposure to certain Winter Storm Uri-related costs in this docket. As the QSE for an LSE that operated during Winter Storm Uri, Avangrid Renewables has standing to intervene in this proceeding under 16 TAC §

22.103(b) because its justiciable interests may be affected by the outcome of this proceeding.

Avangrid Renewables respectfully requests that the administrative law judge grant this motion to intervene and admit Avangrid Renewables as an intervenor in this proceeding.

Respectfully submitted,



AVANGRID RENEWABLES, LLC

BAKER BOTTS L.L.P.

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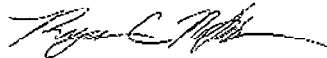
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ATTORNEYS FOR AVANGRID RENEWABLES, LLC

CERTIFICATE OF SERVICE

I certify that on October 4, 2021, this instrument was filed with the Public Utility Commission of Texas and a true and correct copy was served on all parties of record in this proceeding via e-mail.



Ryan C. Norfolk