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Received - 2021-10-19 05:52:45 PM

Control Number - 52364

ItemNumber - 43

PUC DOCKET NO. 52364

**PROCEEDING 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 §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

BP ENERGY COMPANY'S MOTION TO INTERVENE

BP Energy Company ("BP Energy") moves to intervene in the above-styled proceeding pursuant to the Public Utility Regulatory Act ("PURA"), Tex. Util, Code Ann. §§ 11.01 et seq., 16 Tex. Admin. Code ("TAC") §§ 22.101, 22.103(b) and 22.104. BP Energy would show as follows:

1. The names, address and telephone number of BP Energy's authorized representatives are:

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All pleadings and other documents should be served upon BP Energy's authorized representatives.

2. BP Energy is a wholesale market participant within the Electric Reliability Council of Texas (“ERCOT”), a Congestion Revenue Right (“CRR”) Holder, a retail electric provider (“REP”) certificated by the Commission to provide retail electric service in regions of Texas, and an ERCOT Qualified Scheduling Entity for multiple other REPs who are load-serving entities (“LSEs”). These LSEs will be required under PURA § 39.653 to submit documentation of exposure to certain Winter Storm Uri costs, and to document the opt-out choice of opt-out eligible entities they serve, in this docket consistent with the debt obligation order to be issued in Docket No. 52322. As such, BP Energy has a justiciable interest that may be adversely affected by the outcome of this proceeding. BP Energy respectfully requests that this motion to intervene be granted and that BP Energy be granted party status in this proceeding.

Respectfully submitted,

/s/Andrea Kunkel
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ATTORNEY FOR BP ENERGY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on this 19th day of October 2021 by e-mail.

/s/Betsy Carr
Betsy Carr