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Received - 2021-08-10 02:25:13 PM

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PUC DOCKET NO. 52364

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

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers (“TIEC”), pursuant to the Public Utility Regulatory Act (“PURA”), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission’s Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of TIEC’s authorized representatives are:

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All pleadings and other documents should be served upon TIEC’s authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC’s principal purpose is to address electricity matters in proceedings before the Commission.

3. On July 28, 2021, the Public Utility Commission of Texas (“Staff”) filed an application 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.

4. Because TIEC member companies own and operate industrial facilities who may be able to opt out of uplift charges under PURA § 39.653(d) or who will ultimately bear securitization charges, TIEC members will be impacted by any determinations the Commission may make.

For the above stated reasons, TIEC respectfully requests that the Commission grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Katie Coleman

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 10th day of August, 2021 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard