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DOCKET NO. 52364

**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**

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**PUBLIC UTILITY COMMISSION

OF TEXAS**

SOUTH TEXAS ELECTRIC COOPERATIVE’S REQUEST TO INTERVENE

COMES NOW South Texas Electric Cooperative, Inc. (“STEC”) and files this Motion to Intervene in the above-styled proceeding pursuant to 16 Tex. Admin. Code (“TAC”) §§ 22.103 and 22.104, and in support thereof would show as follows:

I. INTRODUCTION

On July 28, 2021, Staff (“Staff”) of the Public Utility Commission of Texas (“Commission”) opened the above-styled docket as the proceeding in which load-serving entities (“LSEs”) will make a one-time election to opt out of uplift financing and uplift charges in accordance with PURA¹ § 39.653(d).

II. AUTHORIZED REPRESENTATIVES

Pursuant to 16 TAC §§ 22.101, 22.103, and 22.104, STEC seeks to intervene in this proceeding. The names, addresses, and telephone numbers of STEC’s authorized representatives are as follows:

Diana M. Liebmann
Texas State Bar No. 00797058
Carlos Carrasco
Texas State Bar No. 24092223
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¹ Tex. Util. Code §§ 11.001-66.016 (“PURA”).

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STEC requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in the proceeding be served upon STEC's authorized representatives.

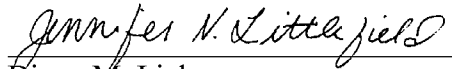
III. JUSTICIABLE INTEREST

The issues addressed in this proceeding concern the financing of uplift balances that may result in the allocation of uplift charges to load-serving entities. STEC is a generation and transmission electric cooperative that is a registered market participant in the ERCOT market. STEC is the wholesale electric provider for nine (9) load-serving entity member electric distribution cooperatives ("Members") that provide retail electric service. As the qualified scheduling entity for its Members, STEC may be obligated to provide information related to uplift charges incurred by its Member, or information related to the election of Members to opt out of uplift financing. Therefore, STEC has a justiciable interest that may be adversely affected by the outcome of this proceeding.

STEC's interests may not be adequately represented by any other party, so STEC seeks to intervene in this proceeding to protect its interests. Having demonstrated standing to intervene, as required by 16 TAC § 22.103, STEC's request for intervention should be granted.

WHEREFORE, PREMISES CONSIDERED, STEC respectfully requests that it be granted intervenor status to participate as a party in this proceeding, and for such other relief to which it may be justly entitled.

Respectfully submitted,



Diana M. Liebmann

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**ATTORNEYS FOR SOUTH TEXAS
ELECTRIC COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was forwarded to all parties of record via electronic mail on the 11th day of August 2021 in accordance with the Second Order Suspending Rules, issued on July 16, 2020 in Project No. 50664.


Jennifer N. Littlefield