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DOCKET NO. 53758

**APPLICATION OF GRID UNITED §
TEXAS, LLC FOR A CERTIFICATE OF § PUBLIC UTILITY COMMISSION
CONVENIENCE AND NECESSITY §
UNDER PURA §§ 37.05(C-1) AND § OF TEXAS
37.056(B)(2)**

TEXAS-NEW MEXICO POWER COMPANY'S MOTION TO INTERVENE

COMES NOW Texas-New Mexico Power Company ("TNMP") and files this Motion to Intervene in the above docketed proceeding pursuant to P.U.C. Proc. R. 22.103 and 22.104, and respectfully shows the following.

I. AUTHORIZED REPRESENTATIVE

The contact information for TNMP's authorized business representative is as follows:

Mr. Stacy Whitehurst, Vice President - TNMP Regulatory Affairs
Texas-New Mexico Power Company
577 N. Garden Ridge Blvd.
Lewisville, Texas 75067
Tel: 214.222.4142
Fax: 214.222.4156

The contact information for TNMP's authorized legal representative is as follows:

Scott Seamster, Associate General Counsel
Texas-New Mexico Power Company
577 N. Garden Ridge Blvd.
Lewisville, Texas 75067
Tel: 214.222.4143
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TNMP requests that all information and documents in this proceeding be served on each of the above listed representatives at their respective addresses or fax numbers.

II. TEXAS-NEW MEXICO POWER COMPANY'S INTEREST

TNMP is a transmission and distribution utility obligated to provide safe, reliable service within the ERCOT region and, as such, may be affected by the proposed facilities and connections being planned by Grid United Texas, LLC ("Grid United Texas") as outlined in its

application filed with the Public Utility Commission of Texas on July 5, 2022 (Application”). The Application proposes a project (the "Project") that would facilitate the import and export of power between the Electric Reliability Council of Texas ("ERCOT") and the Western Electricity Coordinating Council ("WECC") by interconnecting HVDC converter facilities at LCRA Transmission Services Corporation's Bakersfield Switching Station from an endpoint on El Paso Electric Company's system.¹ Any Commission action concerning the import and export of electricity between ERCOT and the WECC will directly affect the flow of electricity on TNMP's electric facilities in West Texas and possibly reliability aspects of the ERCOT transmission grid.

Furthermore, TNMP owns, operates, and maintains transmission and distribution lines and stations in West Texas. The study area includes TNMP service territory such as Fort Stockton and Pecos. All or a portion of these facilities may be impacted by the Project.

TNMP has a justiciable interest in the outcome of this proceeding and, therefore, pursuant to 16 TAC §§ 22.103 - 104., TNMP requests intervenor status in this docket.

III. CONCLUSION

Wherefore, premises considered, Texas-New Mexico Power Company respectfully requests that this motion to intervene be granted and for such other and further relief to which it may show itself to be entitled.

Respectfully submitted,

/s/ Scott Seamster

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¹ See *Application of Grid United Texas LLC for Partial Certificate of Convenience and Necessity Rights Pursuant to PURA §§ 37.051(c-1) and 37.056(B)(2) to Interconnect an HVDC Facility to the ERCOT Transmission Grid*, Docket No. 53758, Application at Bates pgs. 4-5 (Jul. 5, 2022).

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the forgoing document was transmitted to the parties of record in accordance with the Order Suspending Rules issues in Project No. 50664 on May 19, 2022.

/s/ Scott Seamster

Scott Seamster