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APPLICATION OF GRID UNITED	§	PUBLIC UTILITY COMMISSION
TEXAS, LLC FOR A CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	OF TEXAS
UNDER PURA §§ 37.051(c-1) AND	§	
37.056(b)(2) TO INTERCONNECT AN	§	
HVDC FACILITY TO THE ERCOT	§	
TRANSMISSION GRID	§	

**SHARYLAND UTILITIES, L.L.C.’S
MOTION TO INTERVENE**

Sharyland Utilities, L.L.C. (“Sharyland”) files this Motion to Intervene (“Motion”) in the above-styled proceeding under 16 Tex. Admin. Code (“TAC”) §§ 22.103–22.104. In support thereof, Sharyland respectfully shows as follows:

I. AUTHORIZED REPRESENTATIVES

Sharyland’s authorized representative is:

John M. Zerwas, Jr.
Vice President, Regulatory Affairs
Sharyland Utilities, L.L.C.
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Austin, Texas 78701
(512) 721-2707
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Sharyland’s legal representative is:

Jeffrey B. Stuart
State Bar No. 24066160
Eversheds Sutherland (US) LLP
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Sharyland requests that all documents in this proceeding be served upon its authorized representatives.

II. SHARYLAND'S INTEREST

Pursuant to 16 TAC § 22.103(b), Sharyland has standing to intervene in this proceeding because it has a justiciable interest that may be adversely affected by the outcome of the proceeding. On July 5, 2022, Grid United Texas LLC (“Grid United”) filed an application with the Public Utility Commission of Texas (“Commission”) for a partial Certificate of Convenience and Necessity (“CCN”) to Interconnect an HVDC Facility to the ERCOT Transmission Grid. The project would facilitate the import and export of power between the Electric Reliability Council of Texas, Inc. (“ERCOT”) and the Western Electricity Coordinating Council (“WECC”).¹

Sharyland is a wholesale transmission service provider in ERCOT. Sharyland owns and operates an HVDC tie between ERCOT and the Comisión Federal de Electricidad. Any Commission action concerning the import and export of electricity between ERCOT and WECC will affect the flow of electricity on the ERCOT transmission grid and potentially impact reliability of the ERCOT grid.

Sharyland has an obligation to provide safe and reliable electric service. Sharyland therefore has a justiciable interest that may be adversely affected by the outcome of this proceeding and has standing to intervene.

III. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Sharyland respectfully requests that this Motion be granted and that Sharyland be granted party status in this proceeding.

¹ Application at 1-2 (Jul. 5, 2022).

Respectfully submitted,

/s/ Jeffrey Stuart
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Attorney for Sharyland Utilities, L.L.C.

August 3, 2022

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding by U.S. mail, postage prepaid, facsimile, electronic mail, or hand delivery this 3rd day of August, 2022.

/s/ Sarah Merrick
Sarah K. Merrick