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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)	§	

ELECTRIC TRANSMISSION TEXAS, LLC'S MOTION TO INTERVENE

Electric Transmission Texas, LLC ("ETT") moves to intervene in this proceeding under 16 Texas Administrative Code ("TAC") §§ 22.103 – 22.104. In support of its motion, ETT respectfully shows as follows:

I. Authorized Representatives

ETT's authorized business and legal representatives are:

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Email: lmelhem@aep.com

ETT requests that all information, pleadings, and other documents in this matter be served on each of the persons above as well as emailed to aepaustintx@aep.com.

II. Motion to Intervene

Under 16 TAC § 22.103(b), ETT has standing to intervene because it has a justiciable interest that may be adversely affected by the outcome of this proceeding. In this proceeding, Grid United Texas LLC ("Grid United") seeks a finding from the Public Utility Commission of Texas ("Commission") that the public convenience and necessity requires or will require the interconnection of high voltage direct current ("HVDC") converter facilities that will allow the

import of power into, and the export of power out of, the Electric Reliability Council of Texas (“ERCOT”) transmission grid. The proposed project is a 1,500 megawatt HVDC interconnection between ERCOT and the Western Electricity Coordinating Council and is proposed with an HVDC converter station at the LCRA TSC Bakersfield Switching Station in Pecos County, Texas, and an HVDC converter station at an El Paso Electric Company station in El Paso County, Texas.

ETT is a transmission service provider serving in the ERCOT region of Texas. Some of ETT’s facilities are in close proximity to one or more of the proposed points of interconnection, and thus may be affected by the relief requested in this proceeding. In addition, any Commission action concerning the import and export of power into and out of ERCOT will affect the flow of electricity on ETT’s facilities and will potentially affect certain reliability aspects of the ERCOT transmission grid. ETT therefore has a justiciable interest that may be adversely affected by the outcome of this proceeding and standing to intervene.

III. Conclusion and Prayer

For the foregoing reasons, ETT respectfully requests that its motion to intervene be granted and that ETT be granted party status in this proceeding.

Respectfully submitted,

/s/ Leila Melhem

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ATTORNEYS FOR ELECTRIC
TRANSMISSION TEXAS, LLC

Certificate of Service

I certify that on August 10, 2022, a true and correct copy of this document was served on all parties of record by electronic service consistent with the Commission's Second Order Suspending Rules filed on July 16, 2020 in Project No. 50664.

/s/ Leila Melhem