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JOINT PETITION OF TEXAS	§	PUBLIC UTILITY COMMISSION
ENERGY ASSOCIATION FOR	§	
MARKETERS AND ALLIANCE FOR	§	OF TEXAS
RETAIL MARKETS FOR	§	
DESIGNATION UNDER 16 TAC	§	
§ 25.475(b)(5)	§	

**AGREED MOTION TO STAY NOTICE DEADLINES PENDING COMMISSION'S
CONSIDERATION OF APPEAL OF ORDER NO. 4**

The Parties collectively file this agreed motion to stay the deadlines in Order No. 4 pending the Public Utility Commission of Texas's (Commission) consideration of the Appeal of Order No. 4 at the March 7, 2024 open meeting. This motion is agreed to by the REP Coalition, Staff of the Public Utility Commission of Texas (Commission Staff), and the Office of Public Utility Counsel (OPUC), and as such, the parties would show as follows:

Order No. 4, issued by the Administrative Law Judge (ALJ) on January 26, 2024, specified the notice requirements and established deadlines for the REP Coalition to comply with such notice requirements.¹ On February 2, 2024, the REP Coalition timely appealed portions of Order No. 4 determining the form of notice to be provided in this proceeding.² On February 12, 2024, the Commission's Office of Policy and Docket Management filed a letter to all parties informing them that the REP Coalition's Appeal of Order No. 4 would be considered at the March 7, 2024 open meeting.³

The majority of the deadlines established in Order No. 4 that are subject to appeal would require the REP Coalition to comply with the notice requirements before or immediately after its appeal is considered on March 7, 2024. Therefore, the REP Coalition respectfully requests the issuance of an order staying the notice deadlines established in Order No. 4 pending the Commission's consideration of the REP Coalition's Appeal of Order No. 4 at the March 7, 2024 open meeting. The REP Coalition, Commission Staff, and OPUC will file a proposed procedural

¹ Order No. 4 Specifying Notice Requirements and Establishing Procedural Schedule (Jan. 26, 2024).

² REP Coalition's Appeal of Interim Order No. 4 (Feb. 2, 2024).

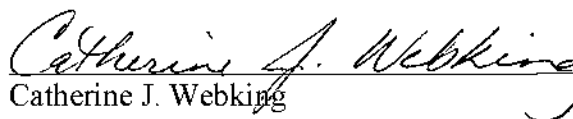
³ Letter to All Parties of Record re: Commission has Added to March 7, 2024 Open Meeting for an Extension of Time (Feb. 12, 2024).

schedule regarding the notice requirements after the Commission's consideration of the REP Coalition's Appeal of Order No. 4.

As a corollary to this motion, the parties request that the Order approving the requested stay does not preclude the parties from moving forward with the notice requirements in Order No. 4 that are not subject to the Appeal – namely the Electric Reliability Council of Texas (ERCOT) Market Notice and Texas Register Notice. The parties will work cooperatively to effectuate the *Texas Register* publication notice and the ERCOT Market Notice consistent with the applicable provisions in Order No. 4 during the pendency of the Appeal of Order No. 4 before March 7, 2024.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request a stay of the notice requirement deadlines in Order No. 4 that are subject to the Appeal to be considered at the March 7, 2024 Open Meeting. The Parties are prepared to work collaboratively to proceed with Texas Register Notice and the ERCOT Market Notice as specified in Order No. 4.

Respectfully submitted,



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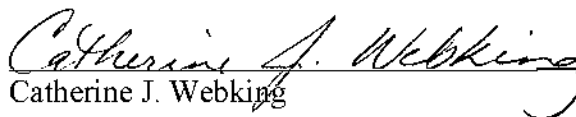
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**COUNSEL FOR ALLIANCE FOR RETAIL
MARKETS**

CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of this document was provided to all parties of record via electronic mail on February 15, 2024 in accordance with the Order Suspending Rules, issued in Project No. 50664.


Catherine J. Webking