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DOCKET NO. 56963

APPLICATION OF ONCOR	§	PUBLIC UTILITY COMMISSION
ELECTRIC DELIVERY COMPANY	§	
LLC TO AMEND ITS	§	OF TEXAS
DISTRIBUTION COST RECOVERY	§	
FACTOR		

ALLIANCE FOR RETAIL MARKETS' MOTION TO INTERVENE

Pursuant to 16 Texas Administrative Code ("TAC") § 22.103(b) and 22.104, the Alliance for Retail Markets ("ARM") files this Motion to Intervene in the above-referenced proceeding. On August 16, 2024, Oncor Electric Delivery Company LLC ("Oncor") filed an application ("Application") for approval to amend its distribution cost recovery factor ("DCRF") in this proceeding. Order No. 1 established September 6, 2024 as the deadline to intervene, and therefore this motion is timely filed.

I. AUTHORIZED REPRESENTATIVES

ARM's authorized legal representatives in this proceeding are:

Carrie Collier-Brown
Robert Dakota Parish
Holly Heinrich
Husch Blackwell LLP
111 Congress Ave., Suite 1400
Telephone: (512) 703-5723
Facsimile: (512) 479-1101
Email: Carrie.CollierBrown@huschblackwell.com
Email: Dakota.Parish@huschblackwell.com
Email: Holly.Heinrich@huschblackwell.com

All pleadings, orders, and other documents should be served on ARM's authorized legal representatives.

II. MOTION TO INTERVENE

ARM¹ is an association of competitive retail electric providers ("REPs"), and its respective members are certificated to provide electric service to customers in areas subject to retail competition in Texas, including the service area of Oncor.

¹ The members of ARM participating in this docket are: Calpine Retail (Calpine Energy Solutions and Champion Energy Services); Constellation Energy Company; ENGIE Resources LLC; NRG Retail Companies (Reliant, Green Mountain Energy Company, U.S. Retailers LLC (Cirro Energy and Discount Power), Stream SPE, Ltd., XOOM Energy Texas, LLC, and the Direct Energy family of retail electric providers); and Vistra Retail Companies (4Change Energy, Ambit Energy, Express Energy, TriEagle Energy, TXU Energy, and Veteran Energy).

Under 16 TAC § 22.103(b), a person has standing to intervene if that person has a right to participate that is expressly conferred by law or if that person “has a justiciable interest which may be adversely affected by the outcome of this proceeding.”² ARM possesses a justiciable interest which may be adversely affected by the outcome of this docket. In this proceeding, Oncor seeks approval to amend its DCRF. All REPs providing retail electric service in Oncor’s certificated service territory, including members of ARM, will be assessed charges resulting from the outcome of this proceeding. For this reason, ARM has standing to intervene and respectfully requests that the Commission grant its motion.

III. CONCLUSION

For the reasons stated in this motion, ARM respectfully requests that the Commission grant this Motion to Intervene, permit ARM to participate in this proceeding as a party, and grant ARM any other relief to which it may be entitled.

Dated: August 27, 2024

Respectfully submitted,

By: /s/ Carrie Collier-Brown

Carrie Collier-Brown

State Bar No. 24065064

Robert Dakota Parish

State Bar No. 24116875

Holly Heinrich

State Bar No. 24109990

HUSCH BLACKWELL, LLP

111 Congress Avenue, Suite 1400

Austin, Texas 78701

Telephone: (512) 703-5723

Facsimile: (512) 479-1101

Email: Carrie.CollierBrown@huschblackwell.com

Email: Dakota.Parish@huschblackwell.com

Email: Holly.Heinrich@huschblackwell.com

ATTORNEYS FOR ALLIANCE FOR RETAIL MARKETS

² See 16 TAC §§ 22.103(b)(1) and (2).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all parties of record via electronic mail on the 27th day of August 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Holly Heinrich

Holly Heinrich