

# **Filing Receipt**

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#### **DOCKET NO. 57491**

COMMISSION STAFF'S PETITION TO	§	
SET 2025 WHOLESALE	§	PUBLIC UTILITY COMMISSION
TRANSMISSION SERVICE CHARGES	§	
FOR THE ELECTRIC RELIABILITY	§	OF TEXAS
COUNCIL OF TEXAS, INC.	§	

## KERRVILLE PUBLIC UTILITY BOARD'S MOTION TO INTERVENE

COMES NOW, the Kerrville Public Utility Board ("KPUB"), pursuant to 16 Tex. Admin. Code §§ 22.103 and 22.104 (TAC) who files this, its Motion to Intervene, in the above-referenced proceeding. The Petition in this case requests a deadline to intervene of January 10, 2025, thus this is timely filed. In support of its Motion, KPUB would respectfully state as follows:

- 1. KPUB is an "affected person" within the meaning of Public Utility Regulatory Act, Tex. Util. Code Ann. § 11.003 (West 2007 & Supp. 2014) (PURA) and qualifies as an "intervenor" within the meanings of 16 TAC §§ 22.2(25) and 22.103.
- 2. The contact information of KPUB's authorized representatives in this proceeding appears below, with Mr. Smyth designated as the lead representative:

Scott Smyth

E-mail: ssmyth@dtrglaw.com

Mallorie P. Falcon

E-mail: mfalcon@dtrglaw.com

DAVIDSON TROILO REAM & GARZA, PC 601 NW Loop 410, Suite 100 San Antonio, Texas 78216

Telephone: (210) 349-6484 Facsimile: (210) 349-0041

3. KPUB is a transmission customer operating within the Electric Reliability Council of Texas (ERCOT). KPUB will be subject to the transmission service issues to be determined in this proceeding. Therefore, KPUB has a justiciable interest that may be adversely affected by the outcome of this proceeding.

WHEREFORE, PREMISES CONSIDERED, KPUB respectfully requests that its Motion to Intervene be granted, that it be afforded full party status in this matter, and such other relief to which it may show itself justly entitled.

Respectfully Submitted,

### DAVIDSON TROILO REAM & GARZA P.C.

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Scott Smyth

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ATTORNEYS FOR KERRVILLE PUBLIC UTILITY BOARD

### CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record in this docket on this the 31<sup>st</sup> day of December 2024, in accordance with 16 TAC § 22.74 and applicable Commission orders.

Mallorie P. Falcor