



## **Filing Receipt**

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<b>APPLICATION OF CENTERPOINT</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ENERGY HOUSTON ELECTRIC, LLC</b>	<b>§</b>	
<b>FOR APPROVAL OF ITS 2026-2028</b>	<b>§</b>	<b>OF</b>
<b>TRANSMISSION AND DISTRIBUTION</b>	<b>§</b>	
<b>SYSTEM RESILIENCY PLAN</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.’S MOTION TO INTERVENE**

Electric Reliability Council of Texas, Inc. (ERCOT) files this Motion to Intervene pursuant to 16 Texas Administrative Code (TAC) §§ 22.102 – 22.104 and respectfully shows the following:

**I. AUTHORIZED REPRESENTATIVES**

The contact information of ERCOT’s authorized legal representatives for service of all documents and pleadings is as follows:

Chad V. Seely SVP Regulatory Policy, General Counsel, and Chief Compliance Officer Texas Bar No. 24037466 (512) 225-7035 (Phone) chad.seely@ercot.com	Brandon Gleason Vice President, Legal and Compliance Texas Bar No. 24038679 (512) 275-7442 (Phone) brandon.gleason@ercot.com	Katherine Gross Senior Corporate Counsel Texas Bar No. 24065610 (512) 225-7184 (Phone) katherine.gross@ercot.com
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Electric Reliability Council of Texas, Inc.  
8000 Metropolis Drive, Bldg. E, Suite 100  
Austin, Texas 78744

**II. PROCEDURAL HISTORY**

On January 31, 2025, CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston”) filed an application<sup>1</sup> for approval of its 2026-2028 Transmission and Distribution System Resiliency Plan under Public Utility Regulatory Act<sup>2</sup> (PURA) § 38.078 and 16 TAC § 25.62.

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<sup>1</sup> The intervention deadline under 16 TAC §§ 22.4(a) and 22.104(b) is March 3, 2025; therefore, this motion is timely filed.

<sup>2</sup> Tex. Util. Code §§ 11.001-66.017.

### III. ERCOT'S INTEREST

ERCOT is the “independent organization” designated by the Commission under PURA § 39.151<sup>3</sup> to ensure the reliability and adequacy of the regional electric network, and is therefore responsible for directing the planning and operation of the electric transmission grid that serves the majority of Texas.<sup>4</sup> The Commission’s rules explicitly require ERCOT to “conduct transmission system planning and exercise comprehensive authority over the planning of bulk transmission projects that affect the transfer capability of the ERCOT transmission system” and to “supervise and coordinate the other planning activities of [Transmission Service Providers].”<sup>5</sup>

Because this resiliency plan will implicate ERCOT’s planning authority under 16 TAC § 25.361(d), this case necessarily impacts ERCOT’s “comprehensive authority”<sup>6</sup> over transmission planning under 16 TAC § 25.361 as well as its broader responsibility to operate the grid under 16 TAC §§ 25.361(b)(1) and (4). ERCOT therefore has a justiciable interest that may be adversely affected by the outcome of this proceeding and consequently has standing to intervene.

### IV. PRAYER

For the foregoing reasons, ERCOT respectfully requests that the Commission grant this Motion to Intervene to allow ERCOT to participate as a party in this proceeding and grant such other and further relief to which ERCOT may show itself to be entitled.

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<sup>3</sup> Tex. Util. Code §§ 11.001-66.017.

<sup>4</sup> 16 TAC § 25.361(b).

<sup>5</sup> *Id.* at § 25.361(d).

<sup>6</sup> *Id.*

Dated: February 6, 2025

Respectfully submitted,

/s/ Katherine

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ATTORNEYS FOR ELECTRIC  
RELIABILITY COUNCIL OF TEXAS,  
INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document was served on all parties of record to this proceeding on February 6, 2025, by email, in accordance with the Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

*/s/ Katherine Gross*  
Katherine Gross