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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY
**Electricity Delivery and
Energy Reliability**

Frontera Marketing, LLC

)

Docket No. EA-403

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

The Electric Reliability Council of Texas, Inc. ("ERCOT") submits this motion to intervene in the referenced proceeding.

On October 29, 2014, Frontera Marketing, LLC (the applicant in this proceeding) and ERCOT submitted a joint informational filing in this proceeding. ERCOT now moves to intervene officially in the proceeding.

I. MOTION TO INTERVENE

ERCOT is the independent system operator for 90% of Texas's electric load, and its core functions include system operations, system planning and administration of the wholesale electric markets. Among other functions, ERCOT is registered with the North American Electric Reliability Corporation ("NERC") as the Reliability Coordinator (RC), Balancing Authority (BA) and Transmission Operator (TOP) for the ERCOT Interconnection, which comprises 75% of the land mass of the State of Texas.

As noted on page two of the application, Frontera Marketing, LLC was formed for the purpose of entering into an exclusive, long-term energy sales agreement with Frontera Generation Limited Partnership ("Frontera Generation") to facilitate marketing of the output of Frontera Generation's generating station (the "Frontera Station") to customers in Mexico, which would be exported over the international transmission facilities authorized by Presidential Permit PP-206. The Frontera Station is located in the operating territory of ERCOT, which also

corresponds to ERCOT's RC, BA and TOP area for the generating unit under the NERC standards. Therefore, ERCOT has a significant interest in this proceeding that cannot be represented by another party. Accordingly, ERCOT moves to intervene in the proceeding.

II. COMMUNICATIONS AND CORRESPONDENCE

Communications and correspondence regarding this filing should be directed to:

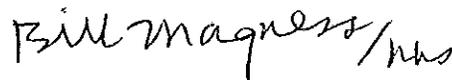
Bill Magness
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III. CONCLUSION

For the foregoing reasons, ERCOT respectfully requests that the Department of Energy grant its motion to intervene.

Respectfully submitted,



Bill Magness
Vice President and General Counsel
Electric Reliability Council of Texas, Inc.



Howard H. Shafferman
Ballard Spahr LLP

Counsel for
Electric Reliability Council of Texas, Inc.

Dated: November 21, 2014

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Frontera Marketing, LLC

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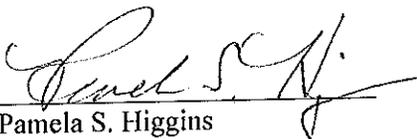
Docket No. EA-403

I hereby certify that I have this 21st day of November, 2014, caused a copy of the foregoing document to be served on the following persons:

Bilal Khan
Frontera Marketing, LLC
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and

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US Department of Energy

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**Electricity Delivery and
Energy Reliability**

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November 21, 2014

By Hand Delivery

Mr. Christopher Lawrence
U.S. Department of Energy, OE-20
Office of Electricity Delivery and Energy Reliability
1000 Independence Avenue, S.W.
Washington, D.C. 20585

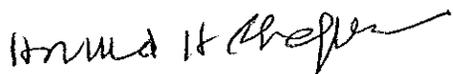
Re: Motion to Intervene of Electric Reliability Council of Texas, Inc.

Dear Mr. Lawrence:

Enclosed please find five copies of the Motion to Intervene of Electric Reliability Council of Texas, Inc., for filing in Docket No. EA-403.

Please date-stamp the extra copy of the motion and return it to the messenger making this filing. Please contact the undersigned if you have any questions concerning this matter.

Very truly yours,



Howard H. Shafferman
Counsel for Electric Reliability Council of Texas, Inc.

cc: Parties to Docket No. EA-403

Enclosures