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Sent: Friday, November 02, 2018 8:29 AM
To: Electricity.Exports
Cc: rhunt@guzmanenergy.com; cmiller@guzmanenergy.com; Bigbee, Nathan; Gleason, Brandon; Loera, Amy
Subject: [EXTERNAL] OE Docket No. EA-462 Application to Export Electric Energy to Mexico - Guzman Energy LLC - ERCOT's Motion to Intervene and Comments
Attachments: EA-462 - 2018.11.13 - ERCOT's Motion to Intervene and Comments.pdf

Sent on behalf of Brandon Gleason

To: Office of Electricity Delivery and Energy Reliability

Please find attached Motion to Intervene and Comments of Electric Reliability Council of Texas, Inc., to be filed with the Department of Energy, Office of Electricity Delivery and Energy Reliability, in OE Docket No. EA-462.

Respectfully,

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**UNITED STATES DEPARTMENT OF ENERGY
OFFICE OF ELECTRIC DELIVERY AND ENERGY RELIABILITY**

Guzman Energy LLC

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Docket No. EA-462

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

Pursuant to the Notice of Application published by the Department of Energy (DOE) Office of Electricity Delivery and Energy Reliability in the Federal Register on October 11, 2018, Electric Reliability Council of Texas, Inc. (ERCOT) moves to intervene in the above-captioned proceeding and provides the following comments regarding the application.

I. IDENTIFICATION OF FILING PARTY

ERCOT is the independent system operator (ISO) for the region covering the majority of Texas, which includes approximately 90% of the state's electric load. ERCOT's core functions include system operations, system planning, and administration of the wholesale electric markets. In performing these functions, ERCOT is subject to oversight by the Public Utility Commission of Texas (PUCT) and the Texas Legislature.

II. COMMUNICATIONS

Correspondence and communications regarding this filing should be addressed to the following persons:

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III. BACKGROUND AND MOTION TO INTERVENE

On September 27, 2018, Guzman Energy LLC filed an application with the DOE Office of Electricity Delivery and Energy Reliability requesting authorization to transmit electric energy from the United States to Mexico. These activities have the potential to impact ERCOT. In particular, exports of energy over transmission facilities interconnecting the ERCOT electric system with the Mexican electric system may have an impact on the quantity and price of energy available in the ERCOT system. These interests are unique to ERCOT and cannot be represented by any other party. Accordingly, ERCOT moves to intervene in this proceeding.

IV. COMMENTS

ERCOT takes no position on whether the requested export authorization should be granted; ERCOT offers these comments only to inform the DOE's evaluation of the impacts of the application on the supply of electricity within the United States pursuant to section 202(e) of the Federal Power Act. The application does not seek to increase the transfer capacity over the existing ties between the ERCOT system and the Mexican electric system, but simply proposes to use the existing ties to transfer energy from the United States to Mexico. Under normal operations, exports from the ERCOT system can be managed through established scheduling procedures and should not have a material impact on reliability, although they could have an impact on energy prices in the ERCOT system. In any case in which transactions over the ties would contribute to a generation

shortage in the ERCOT system or otherwise threaten the reliability of the ERCOT system, ERCOT is permitted by its Protocols and by the NERC Reliability Standards to curtail those transactions as necessary.

V. CONCLUSION

ERCOT respectfully requests that the DOE grant its motion to intervene and give due consideration to the comments submitted herein.

Respectfully submitted,

/s/ Brandon Gleason

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ATTORNEYS FOR ELECTRIC RELIABILITY
COUNCIL OF TEXAS, INC.

Date: November 2, 2018

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically served upon all parties in this proceeding.

Dated at Austin, Texas this 2nd day of November, 2018.

/s/ Brandon Gleason_____

Brandon Gleason