



Control Number: 50695



Item Number: 3

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**PROJECT NO. 50695**

**APPLICATION OF TEJAS POWER  
GENERATION, LLC FOR A POWER  
GENERATION COMPANY  
REGISTRATION**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO TEJAS POWER GENERATION, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Tejas Power Generation, LLC, by and through its attorneys of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer, or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide answers to these questions by filing with the Commission, solely via the Interchange on the Commission's website. Additionally provide notice to all other parties via email that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer, pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: March 27, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
Division Director

/s/ Richard Nemer

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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on March 26, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Richard Nemer

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Richard Nemer

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**DEFINITIONS**

- 1) "TPG," "the Company" or "you" refers to Tejas Power Generation, LLC, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information, or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

- Staff 1-1** Please list all parent companies, subsidiaries, and/or affiliates of Tejas Power Generation, LLC.
- Staff 1-2** Please provide an organizational chart identifying all entities listed in response to Staff 1-1.
- Staff 1-3** Please identify each parent company, subsidiary, or affiliate of Tejas Power Generation, LLC, identified in Staff 1-1, that buys or sells electricity at wholesale in Texas.
- Staff 1-4** Please identify each parent company, subsidiary, or affiliate of Tejas Power Generation, LLC, identified in Staff 1-1, that buys or sells electricity at retail in Texas.
- Staff 1-5** Please refer to page 2 of Tejas Power Generation, LLC's application. In response to Question No. 3, Shell Energy North America (US), L.P., a retail electric provider, is listed as the parent company of Tejas Power Generation, LLC. Is Shell Energy North America (US), L.P., directly involved in the day to day operations of Tejas Power Generation, LLC? If yes, provide a detailed explanation of the relationship between the two companies.
- Staff 1-6** Has Tejas Power Generation, LLC, contracted to sell electricity to Shell Energy North America (US), L.P.? If so, please provide copies of any agreements between Shell Energy North America (US), L.P., and Tejas Power Generation, LLC for the sale of electricity.