



## Filing Receipt

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# HUSCH BLACKWELL

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August 16, 2021

**VIA ONLINE SUBMISSION AND HAND DELIVERY**

Filing Clerk  
Public Utility Commission of Texas  
1701 North Congress Avenue, Suite 8-100  
Austin, Texas 78701

Re: Project No. 51587, *Retail Electric Provider Annual Reports for 2020 and Semi-Annual Reports for 2021 Pursuant to PUC Subst. R. §25.107*

Dear Filing Clerk:

Please accept for re-filing in the above-referenced proceeding the verification for the semi-annual report of Shell Energy North America (US), L.P. ("Shell Energy") for 2021. This semi-annual report was previously submitted on August 13, 2021. The signatures on the required report attestation appeared on the version Shell Energy submitted to the Commission's online interchange, the filed version did not reflect the signatures due to an apparent e-filing issue. Accordingly, in an abundance of caution, Shell Energy re-submits the report to include the attestation previously filed, in hope that the signatures will be visible with this filing.

Thank you for your attention in this matter.

Very truly yours,



Chris Reeder  
Attorney for Shell Energy North America, (US),  
L.P.

Enclosures

PROJECT NO. 51587

RETAIL ELECTRIC PROVIDER (REP) § PUBLIC UTILITY COMMISSION  
ANNUAL REPORTS FOR 2020 AND §  
SEMI-ANNUAL REPORTS FOR 2021 § OF TEXAS  
§

**SHELL ENERGY NORTH AMERICA (US), L.P. 2021 SEMI-ANNUAL REPORT**

Shell Energy North America (US), L.P. (“Shell Energy”) submits its semi-annual report pursuant to P.U.C. SUBST. R. 25.107 (i)(5)(B). Shell Energy additionally submits the affidavit of Marci Milner, Vice President – Regulatory Affairs, attesting to the facts represented herein. Shell Energy provides the following information as required under the rule.

**1. Documentation to demonstrate ongoing compliance with the financial requirements of subsection (f) of this section. (SUBST. R. 25.107 (i)(5)(B)(i)).**

a. Investment Grade Credit Rating (SUBST. R. 25.107 (f)(1)(A)(i)).

Shell Energy relies on its investment grade credit rating to demonstrate compliance with the financial requirements under the rule, and attaches the latest ratings from Moody’s and Standard and Poor credit rating agencies. These are copyrighted materials and are therefore being submitted confidentially and under seal.

b. The amount of customer deposits and the balance of an account in which customer deposits are held (SUBST. R. 25.107 (f)(2)(B))

Shell Energy does not collect customer deposits or residential advance payments.

**2. The audited financial statements of the REP or its guarantor for the most recent completed calendar or fiscal year. (SUBST. R. 25.107 (i)(5)(B)(ii))**

Because Shell Energy has an investment grade credit rating, it is not required to submit audited financial statements. SUBST. R. 25.107 (i)(5)(D).

3. The unaudited financial statements for the most recent six-month financial period that immediately follows the end of its most recent fiscal year or six consecutive months of monthly financial statements. (SUBST. R. 25.107 (i)(5)(B)(iii)).

Because Shell Energy has an investment grade credit rating, it is not required to submit unaudited financial statements. SUBST. R. 25.107 (i)(5)(D).

Respectfully Submitted,

By: 

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ATTORNEY FOR SHELL ENERGY  
NORTH AMERICA (US), L.P.

# AFFIDAVIT

STATE OF TEXAS           §  
                                     §  
COUNTY OF TRAVIS       §

Before me, the undersigned notary public, on this day personally appeared Marcie Milner, to me known to be the person whose name is subscribed to the foregoing instrument, who being duly sworn according to law, deposes and says:

“1. My name is Marcie Milner, Vice President – Regulatory Affairs. I am Vice President – Regulatory Affairs of the reporting REP, Shell Energy North America (US), L.P. (“Shell Energy”). I am over the age of eighteen, am a resident of the State of California, and am competent to make this affidavit.

2 I swear or affirm that in my capacity as Vice President – Regulatory Affairs, I have personal knowledge of the facts stated in Shell Energy’s 2021 Semi-Annual Report (“Report”) being filed today, and this Affidavit is given in support of that Report. I am competent to testify to all the facts stated in the Report, and I have the authority to make this Report on behalf of Shell Energy. I further swear or affirm that all of the statements and/or representations made in the Report are true, complete, and correct to the best of my knowledge.

3. I swear or affirm that any assertions of confidentiality regarding this response have been made with a good faith belief that an exception to public disclosure under Chapter 552 of the Texas Government Code applies to the information provided.

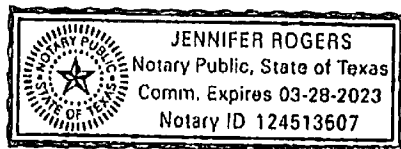
Further affiant sayeth not.

*Marcie Milner*

07/26/2021  
10:02 AM CDT

Marcie Milner  
Vice President – Regulatory Affairs  
Shell Energy North America (US), L.P.

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 26th day of July, 2021. This notarial act was an online notarization.



Online Notary Public. This notarial act involved the use of online audio/video communication technology.

*Jennifer B. Rogers*

07/26/2021  
10:04 AM CDT

Notary Public in and for the  
State of Texas

My Commission Expires: March 28, 2023