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Received - 2021-07-26 04:48:56 PM

Control Number - 52322

ItemNumber - 21

PUC DOCKET NO. 52322

APPLICATION OF THE ELECTRIC	§	
RELIABILITY COUNCIL OF	§	PUBLIC UTILITY COMMISSION
TEXAS, INC. FOR A DEBT	§	
OBLIGATION ORDER TO	§	
FINANCE UPLIFT BALANCES	§	
UNDER PURA CHAPTER 39,	§	OF TEXAS
SUBCHAPTER N, FOR AN ORDER	§	
INITIATING A PARALLEL	§	
DOCKET, AND FOR A GOOD	§	
CAUSE EXCEPTION	§	

SHELL ENERGY NORTH AMERICA (US) LP'S MOTION TO INTERVENE

Shell Energy North America (US) LP (“Shell Energy”), on its own and on behalf of its wholly owned subsidiaries that serve retail customers, moves to intervene in the above-styled proceeding pursuant to the Public Utility Regulatory Act (“PURA”), Tex. Util. Code Ann. §§ 11.001 et seq., 16 Tex. Admin. Code (“TAC”) §§ 22.101, 22.103(b) and 22.104. Shell Energy would show as follows:

1. The name, address, and telephone number of Shell Energy’s authorized representative is:

Resmi Surendran
Vice President, Regulatory Policy
Shell Energy North America
1000 Main Street
Houston, Texas 77002
Direct: (346) 234-0691
Email: resmi.surendran@shell.com

All pleadings and other documents should be served upon Shell Energy’s authorized representative.

2. On July 16, 2021, the Electric Reliability Council of Texas (“ERCOT”) filed an application to issue an order: (1) allowing for financing of up to \$2.1 billion of the “uplift

balance” representing the amount of defaulted obligations ERCOT would uplift to market participants under the Protocols, plus reasonable costs; (2) proposing a debt financing mechanism for this purpose; and (3) to establish uplift charges to be assessed to certain Qualified Scheduling Entities (“QSEs”) associated with this financing, excluding the load of those Load Serving Entities (“LSEs”) that do not opt out pursuant to PURA §39.653 (d) (“debt obligation order”). The Application also requests that the Commission open a separate docket for LSEs to make their one-time election regarding whether to opt out of uplift charges—if they are eligible to opt out under PURA – and to develop a process for LSEs to document their actual exposure to costs included in the uplift balance. The application was filed pursuant to Subchapter N of PURA.¹

3. Shell Energy² is the upstream corporate owner of REPs and QSEs that together participate in the ERCOT market to serve retail customers and would therefore be liable to pay the uplift charges that ERCOT seeks authority to assess in this proceeding. As such, Shell Energy possesses a justiciable interest that may be adversely affected by the outcome of this proceeding.

In recognition of its justiciable interest, Shell Energy request that the Commission grant this Motion to Intervene and admit Shell Energy as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

¹ Tex. Util. Code Ann. §§ 39.651 et seq.

² Shell Energy North America (US) LP is also registered as an Option I REP.

Respectfully submitted,

/s/ Resmi Surendran

Resmi Surendran
Vice President, Regulatory Policy
Shell Energy North America
1000 Main Street
Houston, Texas 77002
Direct: (346) 234-0691
Email: resmi.surendran@shell.com

**AUTHORIZED REPRESENTATIVE FOR:
SHELL ENERGY**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on the 26th day of July, 2021 in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Resmi Surendran

Resmi Surendran