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PUC DOCKET NO. 52930

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NOTICE OF VIOLATION BY SHELL OIL COMPANY FOR VIOLATIONS OF 16 TAC § 25.55 AND ERCOT NODAL PROTOCOLS § 3.21(3), CONCERNING FAILURE TO COMPLY WITH WINTER WEATHER EMERGENCY PREPAREDNESS REPORTING REQUIREMENTS PUBLIC UTILITY COMMISSION

OF TEXAS

JOINT STATUS REPORT AND REQUEST FOR CONTINUED ABATEMENT

On December 8, 2021, the Executive Director of the Public Utility Commission of Texas (Commission) filed a formal Notice of Violation (NOV) against Shell Oil Company (Shell) in the above-styled proceeding. Commission Staff and Shell are referred to herein as "the Parties." On December 23, 2021, Shell filed a request for hearing. On January 7, 2022, Shell filed an agreed request to abate the proceeding pending settlement negotiations with Commission Staff.

On January 13, 2022, the administrative law judge (ALJ) filed Order No. 1, abating the proceeding. The proceeding has remained in abatement since that time and through subsequent orders to allow the parties sufficient time to discuss settlement. On April 8, 2022, the Parties indicated in a status report that a settlement had been reached in principle. On April 11, 2022, the ALJ filed Order No. 6, requiring the Parties to file a completed settlement package, or alternatively, a Joint Status Report regarding the parties' progress in preparing the settlement documents by May 20, 2022.

I. STATUS REPORT AND REQUEST FOR CONTINUED ABATEMENT

Commission Staff and Shell have exchanged drafts of settlement documents and are actively in negotiations regarding the language therein. Accordingly, Shell respectfully requests that the abatement of this proceeding be continued and that a deadline of June 10, 2022 be established for the parties to file either a completed settlement package or, alternatively, a joint status report regarding the parties' progress in preparing the settlement documents. Shell has conferred with Commission Staff regarding the substance of this filing and is authorized to represent that the filing be made jointly.

II. CONCLUSION

The parties respectfully request that the abatement of this proceeding be continued and that a deadline of June 10, 2022 be established for the parties to file a settlement package or a joint status report and whether continued abatement of this docket is appropriate.

Respectfully Submitted,

/s/ Alaina Zermeno

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ATTORNEYS FOR SHELL OIL COMPANY

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 23rd day of May 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

<u>/s/ Alaina Zermeno</u> Alaina Zermeno