



## Filing Receipt

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April 14, 2022

Public Utility Commission of Texas  
Attn: Filing Clerk  
P.O. Box 13326  
Austin, TX 78711-3326

Re: *Docket No. 53486, Application of Shell Energy North America (US), L.P. (SENA) to Relinquish its Retail Electric Provider Certificate*

*Project No. 53385, Project To Submit Emergency Operations Plans And Related Documents Under 16 TAC § 25.53*

To Whom it May Concern:

This letter is submitted on behalf of our client Shell Energy North America (US), L.P. (“SENA”), concerning the upcoming requirement set forth in 16 T.A.C. § 25.53 to file an emergency operations plan (“EOP”) with the Commission by April 18, 2022. Please feel free to contact me with any questions.

SENA filed an application with the Commission on April 12, 2022 to relinquish its retail electric provider (“REP”) certificate, which is pending in the above referenced docket. SENA is not serving any customers and has no intention of doing so in the future. Upon receiving approval for relinquishment, SENA will cease to be a REP and will no longer be required to comply with 16 T.A.C § 25.53.<sup>1</sup> SENA’s affiliates are and will continue to be a REP authorized to serve retail electric customers in Texas and will file their EOP to comply with 16 T.A.C. § 25.53.

Accordingly, preparing an EOP will serve no reasonable purpose, nor would filing the EOP and having Staff devote resources to reviewing it. In light of these factors and to the extent required, SENA therefore requests a good cause exception from the Commission under 16 T.A.C. § 22.5(b) from the EOP filing requirement. Although SENA has absolutely no intention of

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<sup>1</sup> See 16 TAC § 25.53(a)(4), describing the “entities” required to comply with the rule, which includes an electric utility, a transmission and distribution utility, power generation company, municipally owned utility, electric cooperative, REP, or ERCOT. Of these entities, SENA only currently qualifies as a REP.

Public Utility Commission of Texas  
April 14, 2022  
Page 2

withdrawing its application to relinquish its certification, should that happen for any reason SENA would commit to filing an EOP within a time certain after such withdrawal occurred.

I certify by my signature below that I have caused a copy of this letter to be served on the Commission Legal Division by electronic mail on this date.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Chris Reeder", with a long horizontal flourish extending to the right.

Chris Reeder  
Attorney for Shell Energy North America (US)