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DOCKET NO. 57234

APPLICATION OF ARM ENERGY	§	PUBLIC UTILITY COMMISSION
POWER, LLC FOR A RETAIL	§	
ELECTRIC PROVIDER	§	OF TEXAS
CERTIFICATE	§	

**COMMISSION STAFF'S SUPPLEMENTAL RECOMMENDATION ON SUFFICIENCY
OF THE APPLICATION**

On October 23, 2024, ARM Energy Power, LLC (ARM Energy) filed an application for certification as an Option 1 retail electric provider (REP) to provide retail electric services throughout the State of Texas under PURA¹ § 39.352 and 16 Texas Administrative Code (TAC) § 25.107. ARM Energy filed supplemental information on November 7, 2024, January 27, February 3, and March 14, 2025.

On March 21, 2025, the administrative law judge (ALJ) filed Order No. 6, directing the Staff (Staff) of the Public Utility Commission of Texas (Commission) to file a supplemental recommendation on application sufficiency by May 9, 2025. Therefore, this pleading is timely filed.

I. RECOMMENDATION REGARDING SUFFICIENCY

Staff has reviewed ARM Energy's supplemented application and, as supported by the attached memorandum of Ethan Blanchard, Rate Regulation Division, Staff recommends that the application be found deficient from a financial perspective and that ARM Energy be ordered to address the deficiencies outlined.

II. PROPOSED PROCEDURAL SCHEDULE

In accordance with Staff's deficiency recommendation, Staff proposes the following procedural schedule:

Event	Deadline
Deadline for ARM Energy to file supplemental information to address deficiencies in the application	May 23, 2025
Deadline for Staff to file a supplemental recommendation on the sufficiency of the application and propose additional deadlines, if appropriate	June 6, 2025

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016

III. CONCLUSION

For the reasons above, Staff respectfully requests the entry of an order deeming the supplemented application deficient and adopting the proposed procedural schedule.

Dated: May 9, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

/s/ Glen Imes
Glen Imes
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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on May 9, 2025, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Glen Imes
Glen Imes

Public Utility Commission of Texas

Memorandum

TO: Glen Imes
Legal Division

FROM: Ethan Blanchard
Rate Regulation Division

DATE: May 9, 2025

RE: Docket No. 57234 – *Application of Application of ARM Energy Power, LLC for a Retail Electric Provider Certificate*

On October 23, 2024, ARM Energy Power, LLC (ARM) filed an application for an Option 1 retail electric provider (REP) certificate.

I have reviewed ARM's application and I recommend that it be deemed insufficient for filing at this time. I recommend that the applicant do the following to resolve the deficiencies:

1. Provide the documentation required per 16 TAC § 25.107(f)(4)(C) demonstrating that ARM has adequate shareholders' equity in accordance with 16 TAC § 25.107(f)(1)(B).