



Filing Receipt

Filed Date - 2025-06-06 01:03:07 PM

Control Number - 57959

Item Number - 4

Public Utility Commission of Texas

Memorandum

TO: Docket Management Division

FROM: James Kelsaw
Consumer Protection Division

DATE June 6, 2025

RE: Project No. 57959, Application of Regis Sinton Pirate, LLC for a Power
Generation Company Registration

RECOMMENDATION

I. Application

On April 14, 2025, Regis Sinton Pirate, LLC (Regis Sinton Pirate) filed an application to register as a new power generation company (PGC) pursuant to 16 Texas Administrative Code (TAC) § 25.109. The unit being registered is a 9.9 MW energy storage facility.

II. Application Requirements

Under 16 TAC § 25.109(c) to register as a PGC a person must use the registration form prescribed by the Commission. A person registering as a PGC must provide the following information:

- (1) Contact information of the registrant and the registrant's primary and secondary emergency contacts.
- (2) The name of the current regulatory contact, the contact's e-mail address and telephone number, and if the regulatory contact is an internal staff member of the registrant.
- (3) Information about each generating facility operated by the registrant.
- (4) A description of the types of services provided by the registrant that relate to the generation of electricity.
- (5) An oath or affirmation signed by a representative, official, officer or other authorized person was included with the application.

Furthermore, under 16 TAC § 25.109(d), a person registering as a PGC must also submit the following:

- (1) An affidavit by a representative, official, officer, or other authorized person.
- (2) The name of the registrant's corporate parent company.
- (3) The names of the registrant's affiliates.
- (4) The applicable control number and item number of its initial Emergency Operations Plan (EOP).
- (5) As applicable, copies of the registrant's Federal Energy Regulatory Commission registration as a QF or an EWG.

III. Recommendation

I have reviewed Regis Sinton Pirate's application to register as a PGC and find it to be insufficient. Although the company provided the information required under 16 TAC §§ 25.109(c) and 25.109(d), its Emergency Operations Plan (EOP) does not meet all of the requirements of PUC Substantive Rule 25.53. Specifically, the EOP does not have an "Executive Summary" as required by 16 TAC § 25.53 (c)(1)(A), nor does it have an affidavit pursuant to 16 TAC § 25.53 (c)(4)(C). Commission Staff respectfully requests the presiding officer to issue an order requiring the registrant to amend its EOP and refile it in Project No. 53385 and file a revised PGC registration application with the new EOP filing item number in Project No. 57959.