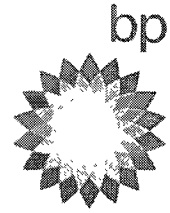
**Tina B. Kirby**
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November 6, 2026

Public Utilities Commission of Nevada
1150 East William Street
Carson City, Nevada 89701-3109

RCV'D - PUCN - CC
2026 NOV 12 PM2:44

**Reference: Docket No. 26-10005, Response of BP Energy Retail Company LLC regarding calendar year 2025 Gas Annual Report G-22**

To the Commission:

BP Energy Retail Company LLC ("BPERC") respectfully submits this response concerning its calendar year 2025 Gas Annual Report G-22. IGI acknowledges that the confidential portion of the filing did not comply with the confidentiality-submission requirements of NAC 703.5274. On June 1, 2026, Commission Staff advised that the filing had been rejected because the confidential materials were not submitted in the required separate confidential envelope, on pink paper, with each page marked confidential.

**Nature of the filing deficiency**

BPERC had arranged for public and confidential versions of its annual report to be produced and submitted. The filing service provider subsequently advised that pink electronic copies had been provided to the printing vendor, but the confidential pages mailed by the vendor were printed without the required color and appeared gray rather than pink. BPERC recognizes that responsibility for compliance with the Commission's filing requirements remains with the regulated entity notwithstanding its use of service providers.

**Corrective action**

After notice of the deficiency, BPERC and its filing service provider acted to correct the affected G-22 submission. On June 3, 2026, replacement public and confidential packages were prepared. The confidential version was printed on pink paper and marked confidential, and the package was sent directly to Commission Staff by FedEx. Delivery was confirmed through carrier tracking on June 4, 2026.

On June 22, 2026, the filing service provider advised BPERC that Commission Staff had indicated that the corrected confidential submission was accepted. BPERC understands that acceptance for filing does not constitute a determination of substantive compliance or waive any Commission requirement.

**Corrective measures**

BPERC has revised the process for these submissions so that the filing service provider prints and mails the public and confidential packages directly rather than relying on the prior third-party printing workflow. The revised process also requires pre-submission verification of the applicable confidentiality requirements, including:

- use of pink paper for confidential pages;
- confidential markings on each applicable page and the sealed envelope;
- reconciliation of the confidential submission to the public or redacted version; and,
- retention of filing and delivery evidence.

**Requested Commission action**

The deficiency was corrected promptly, the replacement package was delivered directly to Commission Staff, and the workflow that produced the paper-color error has been revised. Staff's June 1 communication identified a confidentiality-submission deficiency and did not identify a substantive deficiency in the information reported.

For these reasons, BPERC respectfully requests that the Commission:

- allow BPERC's certificate, license, permit, or other Commission authority to remain in good standing;
- determine that no additional administrative action is necessary to secure compliance; and

- waive any administrative fine or, alternatively, reduce any resulting fine considering the prompt corrective action and the measures implemented to prevent recurrence.

BPERC remains committed to timely and procedurally compliant regulatory filings, regrets the filing oversight, and appreciates the Commission's consideration of the steps taken to promptly correct the filing and prevent a similar issue in the future.

Kind regards,

**Tina Kirby**
Tax Senior Manager
On behalf of BP Energy Retail Company LLC