

Sarah C. Stoner
717.237.6026
sstoner@eckertseamans.com

June 17, 2019

Via Hand Delivery

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RECEIVED
2019 JUN 17 PM 3:34
PA PUC
SECRETARY'S BUREAU
FRONT DESK

Re: Petition of Direct Energy Services, LLC to Reduce its Bond/Security Level to 5% of Gross Receipts; Docket No. A-110164

Dear Secretary Chiavetta:

Please accept this Letter Petition on behalf of Direct Energy Services, LLC ("Direct Energy") requesting that its required level of financial security be reduced to the level of 5% of its last twelve months of gross receipts. This request is being made pursuant to the Commission's Bond Reduction Order¹ and is being submitted at least 90 days prior to the expiration date of Direct Energy's current security. In support of Direct Energy's request, please find the following information and documentation:

- 1) Direct Energy's gross receipts in Pennsylvania for the most recent twelve months attached hereto as Appendix A (**CONFIDENTIAL**);
- 2) Direct Energy is current with its tax liabilities to the Commonwealth of Pennsylvania and is providing proof of its prepaid gross receipts taxes toward its estimated revenues for the current year in Appendix B (**CONFIDENTIAL**);
- 3) Direct Energy's Alternative Energy Portfolio Standards compliance data is attached hereto as Appendix C (**CONFIDENTIAL**);
- 4) Direct Energy has been a load serving entity in the Commonwealth of Pennsylvania for over two years; and
- 5) Direct Energy is compliant with the Commission's annual and supplemental fee requirements.

¹ *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments*, Docket No. M-2013-2393141, Final Order entered July 24, 2014.

Direct Energy requested a Tax Status Letter from the Pennsylvania Department of Revenue to evidence that it is current with its tax liabilities to the Commonwealth. Upon receipt of the Tax Status Letter, Direct Energy will supplement this Letter Petition.

Please note that the confidential attachments to this Letter Petition are being provided to the Commission under seal and it is requested that they be maintained in a non-public folder.

Enclosed please find a verification attesting to the truthfulness of facts set forth in this request. Also enclosed is a check in the amount of \$350.00 for the required filing fee for this Letter Petition. The statutory advocates, the Commission's Bureau of Investigation & Enforcement, the Office of Attorney General, the Pennsylvania Department of Revenue and pertinent electric distribution companies have been served with a copy of this Letter Petition as evidenced by the enclosed Certificate of Service.

Thank you for your attention to this matter. Should you have any questions or concerns regarding this matter, please feel free to contact me.

Sincerely,

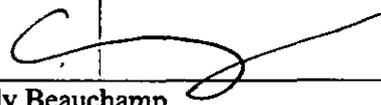


Sarah C. Stoner

cc: Stephen Jakab, Bureau of Technical Utility Services (with appendices)
Certificate of Service (without appendices)

VERIFICATION

I, Andy Beauchamp, state that I am a Regulatory Licensing and Reporting Analyst for Direct Energy. I hereby verify that I am authorized to and do make this Verification for Direct Energy Services, LLC, and that the facts set forth in the foregoing **Letter Petition** are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Andy Beauchamp
Regulatory Licensing & Reporting Analyst
Direct Energy

RECEIVED
2019 JUN 17 PM 3:34
PA PUC
SECRETARY'S BUREAU
FROTH DESIG

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Direct Energy Services, LLC's Letter Petition upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via First Class Mail

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Met-Ed, Penelec, and Penn Power:
Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

Office of Attorney General
Bureau of Consumer Protection
14th Floor, Strawberry Square
Harrisburg, PA 17120

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Office of Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

Legal Department
Attn: Kimberly A. Klock
PPL
Two North Ninth Street
Allentown, PA 18108-1179

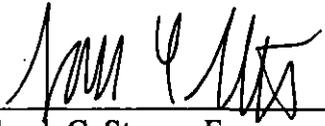
Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, PA 19612-2677

Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

Pike County Light & Power Company
Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Dated: June 17, 2019



Sarah C. Stoner, Esq.

RECEIVED
2019 JUN 17 PM 3:35
PA PUC
SECRETARY'S BUREAU
FRONT DESK