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August 18, 2014

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VIA FEDERAL EXPRESS

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building, 2nd Floor  
Harrisburg, Pennsylvania 17120

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Champion Energy Services, LLC  
Request to Amend Electric Generation Supplier License  
Docket No. A-2009-2124113**

Dear Secretary Chiavetta:

Pursuant to Order M-2013-2393141, Champion Energy Services, LLC ("Champion") respectfully requests that the Commission amend Champion's electric generation supplier license to reduce the amount of bond required pursuant to 52 Pa. Code § 54.40, as set forth more completely in Attachment A. Champion has enclosed the requisite \$350 filing fee.

In support of this request, Champion is submitting under seal the following documents:

- Champion's gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent 12 months (Attachment A);
- The amount of gross receipts taxes that Champion has prepaid towards its estimated revenues for the current calendar year, together with supporting documentation from the Department of Revenue (Attachment B); and
- Champion's available AEPS compliance data from the most recent 12 months (Attachment C).

**These documents contain proprietary information** that should not be publicly disclosed. This proprietary information contains sensitive commercial and/or financial

Rosemary Chiavetta, Secretary  
August 18, 2014  
Page 2

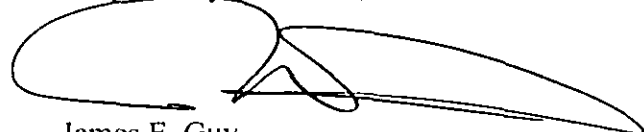
information that could be used by Champion's competitors to determine Champion's market share in each service area, and thereby provide them insight into their relative position in the market, and Champion's marketing strategy, which would be of value to Champion's competitors, giving them an unfair advantage.

Disclosure of this proprietary information would cause substantial harm to Champion, outweighing any public interest considerations for public disclosure of this type of information, and confidential treatment would be consistent with federal law concerning protection of market share, *see, e.g., Sharkey v. FDA*, 2007 U.S. App. LEXIS 23597 (11th Cir. 2007) (holding that market share and sales volume of vaccine manufacturers is confidential commercial information), and other states' treatment of sales data, *see, e.g., Champion Energy, LLC's Petition for Relief to Protect Petitioner's 2013 Kilowatt-Hour Report from Disclosure for Not Less Than Two Years to Protect Highly Confidential and Proprietary Information* Illinois Commerce Commission Docket No. 14-0198, Order (I.C.C. Apr. 16, 2014) (finding Champion's total kilowatt-hour sales were confidential information that should not be publicly disclosed).

Therefore, Champion requests confidential treatment under 52 Pa. Code § 5.423. Accordingly, this report contains four copies (two copies with the confidential data expurged and two copies of the unexpurged report, marked confidential).

This filing also includes an extra copy for our records and an extra copy for Champion's records. Please date-stamp these extra copies (and cover letters) and return them at your earliest convenience using the enclosed self-addressed, stamped envelopes. Thank you for your assistance, and please contact me if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'James E. Guy', written over a horizontal line.

James E. Guy  
*Attorney for Champion Energy Services, LLC*

JEG/js

**ATTACHMENT A  
REVENUE AND BONDING REQUIREMENTS**

CONFIDENTIAL

**ATTACHMENT B  
PREPAID GROSS RECEIPTS TAXES**

CONFIDENTIAL

**ATTACHMENT C**  
**Available AEPS Compliance Data**

CONFIDENTIAL

From (512) 721-2705  
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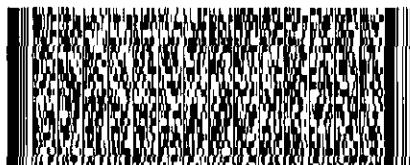
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SECRETARY'S BUREAU

HARRISBURG, PA 17120

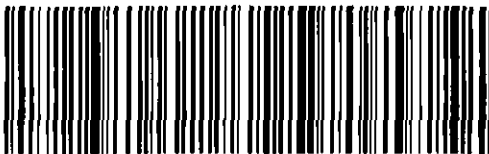
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