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Power for change.



North American Power  
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October 27, 2014

**Via Fed-Ex**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

OCT 29 2014

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Petition for North American Power and Gas, LLC to Reduce Its Bonding Requirement; Docket No. A-2010-2176743**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission (the "Commission") is the Petition of North American Power and Gas, LLC ("NAPG") to Reduce its Bonding Requirement ("Petition"). The Petition is filed pursuant to the Commission's final order in Docket No. M-2013-2393141, issued July 24, 2014. The licensee number of NAPG is A-2010-2176743.

Enclosed, please find the following:

1. NAPG's Petition and Verification;
2. Appendix A to the Petition: gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent 12 months;
3. Appendix B to the Petition: the amount of gross receipts taxes that NAPG has prepaid towards its estimated revenues for the current calendar year;
4. Appendix C to the Petition: AEPS compliance data from the most recent 12 months;
5. \$350 filing fee

The attachments hereto contain proprietary information, the disclosure of which would cause unfair economic and competitive damage to NAPG. Accordingly, NAPG requests, pursuant to 52 Pa. Code § 5.365, that such information not be placed in the Commission's public files, nor be made available on the Commission's website. If you have any questions regarding this filing, please do not hesitate to contact me via telephone at (203) 663-9757 or via email at [kjoseph@napower.com](mailto:kjoseph@napower.com).

Regards,

Keenia Joseph  
Director, Regulatory Affairs  
North American Power and Gas, LLC  
20 Glover Avenue  
Norwalk, CT 06850

cc: Bureau of Technical Utility Services

20 Clover Avenue  
Norwalk, CT 06850  
p: 203.939.1155  
f: 203.286.2064

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of North American :  
Power and Gas, LLC to : Docket No. A-2010-2176743  
Reduce Its Bonding Requirement :

**Petition for North American Power and Gas, LLC  
to Reduce Its Bonding Requirement**

North American Power and Gas, LLC ("NAPG") hereby files the instant Petition to Reduce its Bonding Requirement pursuant to the Pennsylvania Public Utility Commission's (the "Commission") Final Order in Docket No. M-2013-2393141, issued July 24, 2014.<sup>1</sup> In support thereof, NAPG avers as follows:

1. NAPG is a licensed electric generation supplier ("EGS") in the Commonwealth of Pennsylvania.
2. NAPG has been a licensed EGS for more than one year. It was licensed in 2010 at Docket No. A-2010-2176743 and has maintained its license in good standing since that time.
3. NAPG is compliant with its current bonding requirements.
4. In the Bond Order, the Commission held that an EGS, following its first year of operations, may petition to have its bonding requirement reduced from 10% to 5% of the EGS's last 12 months of revenue or \$250,000, whichever is greater.
5. Through this Petition, NAPG seeks to reduce its bonding requirement to 5% of its last 12 months of revenue.

<sup>1</sup> *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments*, Docket No. M-2013-2393141 (Order entered July 24, 2014) (the "Bond Order").

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6. As required by the Bond Order the following information is included as Appendices A-C (CONFIDENTIAL) which are attached hereto and incorporated by reference: NAPG's (i) gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent 12 months, (ii) prepaid gross receipts tax for the last 12 months, and (iii) Alternative Energy Portfolio Standards compliance data.

7. As directed by the Bond Order, NAPG anticipates working with the Commission's Bureau of Technical Utility Services ("TUS") to process this Application. NAPG welcomes TUS's input and guidance regarding this Petition.

8. After coordination with TUS and upon approval of the reduction and other changes, if any, NAPG will make a compliance filing with the new bond reflecting the reduced bond amount.

North American Power and Gas, LLC respectfully requests that the Pennsylvania Public Utilities Commission, in accordance with the Bond Order, grant the instant Petition and approve a reduction to the bonding requirements of North American Power and Gas, LLC.

Respectfully submitted




Keenia Joseph  
Director, Regulatory Affairs  
North American Power and Gas, LLC  
20 Glover Avenue  
Norwalk, CT 06850

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**VERIFICATION**

I, Keenia Joseph, Director of Regulatory Affairs for North American Power and Gas, LLC, hereby state that the facts set forth in this 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 a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904.

Dated: 10/27/14

  
Keenia Joseph

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**CONFIDENTIAL  
APPENDIX A**

**North American Power and Gas Revenues in the State of Pennsylvania for the Period  
September 1, 2013 through August 31, 2014:**

**REDACTED**

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REDACTED



REDACTED

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APPENDIX B**

**North American Power and Gas Prepaid Gross Receipts Tax for the Last 12 months**

REDACTED



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REDACTED





REDACTED

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APPENDIX C**

**Alternative Energy Portfolio Standards Compliance Data**

REDACTED



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SECRETARY'S BUREAU**

From: (800) 213-0100  
Raymond Tuohy Jr.  
Day Pitney LLP  
242 Trumbull Street

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Rosemary Chiavetta  
Pennsylvania Public Utility Commiss  
400 NORTH ST FL 2

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Dept #

HARRISBURG, PA 17120

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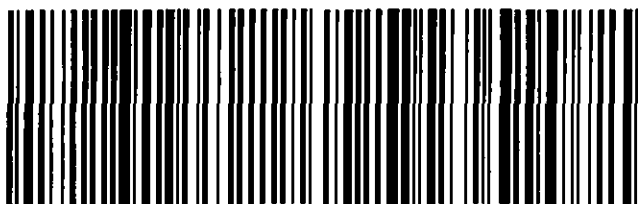
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**EN MDTA**



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