



A-2013-2369 288

Danielle Jouenne, Esq.

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King of Prussia, PA 19406

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April 9, 2015

VIA OVERNIGHT MAIL

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Petition of UGI Energy Services, LLC d/b/a/ UGI EnergyLink to Reduce its Bonding Requirement; Docket No. A-2013-2369288

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of UGI Energy Services, LLC d/b/a UGI EnergyLink ("UGIES") to reduce its bonding requirement ("Petition"). The Petition is filed in accordance with the Commission's final order entered on July 24, 2014 at Docket No. M-2013-2393141. UGIES has enclosed the required filing fee in the amount of \$350.00 (Check No. 083011).

In support of this Petition, UGIES is submitting under seal the following documents:

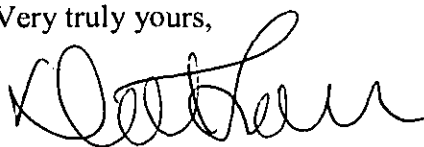
1. UGIES' gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent 12 months (Appendix A to the Petition);
2. The amount of gross receipt taxes that UGIES has prepaid towards its estimated revenues for 2013, the most recent year filed, with supporting documentation from the Department of Revenue (Appendix B to the Petition);
3. The Specialty Tax Extension Request confirmation received from the Department of Revenue, granting an extension for filing the Gross Receipt Tax Reports for 2014, which reflects UGIES' Prepayment Amount for 2015 (Appendix C to the Petition);
4. UGIES' available Alternative Energy Portfolio Standards compliance data for the most recent 12 months (Appendix D to the Petition).

Enclosed are two copies of the confidential version of this filing, containing the above appendices. These appendices contain proprietary information, the disclosure of which would cause unfair economic and competitive damages to UGIES. UGIES 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. Two copies of the redacted public version of this filing are also enclosed. Please date-stamp the extra copy provided of each and return to my attention

using the enclosed self-addressed stamped envelope. Copies of the redacted public version of this Petition have been served as indicated on the enclosed Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Danielle Jouenne', written in a cursive style.

Danielle Jouenne
Counsel for UGI Energy Services, LLC

Enclosures

Cc: Certificate of Service (Redacted Public Version)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of UGI Energy Services, LLC d/b/a/
UGI EnergyLink to Reduce Its Bonding
Requirement : : Docket No: A-2013-2369288
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PETITION OF UGI ENERGY SERVICES, LLC d/b/a/ UGI
ENERGYLINK TO REDUCE ITS BONDING REQUIREMENT

UGI Energy Services, LLC, d/b/a UGI EnergyLink (“UGIES”) hereby files the instant Petition to Reduce its Bonding Requirement pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) Final Order, at Docket No. M-2013-2393141, entered July 24, 2014 (“Bond Order”).¹ In support thereof, UGIES avers as follows:

1. UGIES is a licensed electric generation supplier (“EGS”) in the Commonwealth of Pennsylvania.
2. UGIES has been a licensed EGS for more than one year. It was licensed in 2013 at Docket No. A-2013-2369288 and has maintained its license in good standing since that time.
3. UGIES 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. (Bond Order, pp. 17-18.)
5. Through this petition, UGIES seeks to reduce its bonding requirement to 5% of its last 12 months of revenue.

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

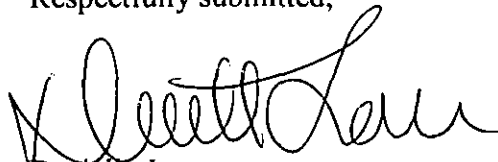
6. UGIES has included the following information in Appendices A-D respectively: (i) gross revenue for the sale of electricity to retail customers in Pennsylvania for the most recent 12 months; (ii) the amount of gross receipts taxes that UGIES has prepaid towards its estimated revenues for 2013, the most recent year filed, with supporting documentation from the Department of Revenue; (iii) the Specialty Tax Extension Request confirmation received from the Department of Revenue which grants an extension for filing the Gross Tax Receipt Reports for 2014 and reflects UGIES' Prepayment Amount for 2015; and (iv) Alternative Energy Portfolio Standards compliance data.

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

8. After coordination with TUS and upon approval of the reduction, UGIES will make a compliance filing with the new bond reflecting the reduced bond amount.

UGI Energy Services, LLC therefore respectfully requests that the Pennsylvania Public Utilities Commission, in accordance with the Bond Order, grant the instant Petition and approve a reduction to its bonding requirements.

Respectfully submitted,

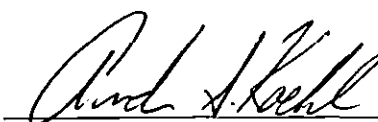
A handwritten signature in black ink, appearing to read 'Danielle Jouenne', written in a cursive style.

Danielle Jouenne
Counsel for UGI Energy Services, LLC

Dated: April 9, 2015

VERIFICATION

I, Andrew S. Koehler, hereby state that the facts set forth above 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 (relating to unsworn falsification to authorities).



Andrew S. Koehler,
Controller

Date: 3/27/15

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APPENDIX A

**UGIES Gross Revenues for the Sale of Electricity to Retail Customers in Pennsylvania for
the Most Recent Twelve Months**

[REDACTED]

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SECRETARY'S BUREAU**

APPENDIX B

**UGIES Gross Receipts Taxes Prepaid Towards Estimated Revenues for the Current
Calendar Year**

[REDACTED]

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SECRETARY'S BUREAU**

APPENDIX C
Specialty Tax Extension Request Confirmation Received from the Department of Revenue,
Reflecting UGIES' Prepayment Amount for 2015 (Effective March 11, 2015)

[REDACTED]

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APPENDIX D
**UGIES Alternative Energy Portfolio Standards Compliance Data for the Most Recent
Twelve Months**

[REDACTED]

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of UGI Energy Services, LLC d/b/a/
UGI EnergyLink to Reduce Its Bonding
Requirement

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Docket No: A-2013-2369288

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have, this 9th day of April, served a true and correct copy of the foregoing redacted public version of this document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA FIRST CLASS MAIL:

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

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Office of Small Business Advocate
300 North Second Street – Suite #202
Harrisburg, PA 17101

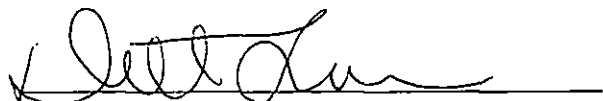
Duquesne Light Company
Attn: Regulatory Affairs
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

First Energy
Attn: Legal Department
2800 Pottsville Pike
Reading, PA 19612

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

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

PPL Electric
Attn: Legal Department
Two North Ninth Street
Allentown, PA 18108-1179


Danielle Jouenne

Dated: April 9, 2015

From: (610) 992-3209
Danielle Jouenne
UGI Corporation
460 N. Gulph Road

Origin ID: KPDA



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King of Prussia, PA 19406

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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Comm.
400 NORTH ST
COMMONWEALTH KEYSTONE BLDG.
HARRISBURG, PA 17120

Ref #
Invoice #
PO #
Dept # 0411

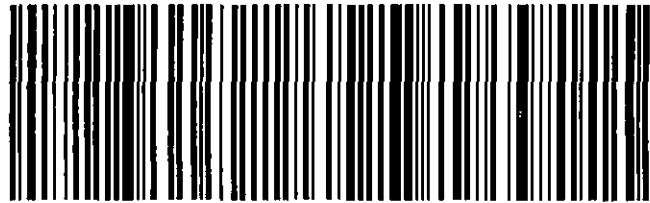
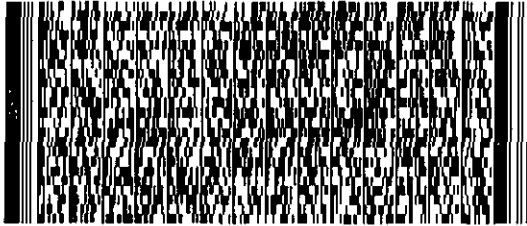
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