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October 13, 2015

VIA HAND DELIVERY

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

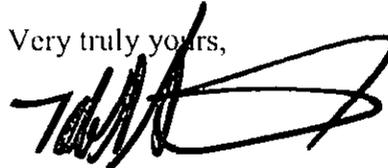
RE: Petition of Interstate Gas Supply, Inc. d/b/a IGS Energy, to Revise its Current Bond/Security; Docket No. A-2011-2228643; **SERVICE OF PETITION OF INTERSTATE GAS SUPPLY, INC. D/B/A IGS ENERGY TO REDUCE BONDING LEVEL**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is a copy of the original filing made by Interstate Gas Supply, Inc. d/b/a IGS Energy ("IGS") on August 17, 2015. The purpose of this submission is to provide service of the above-captioned filing upon the affected Electric Distribution Companies and the Public Advocates. Accordingly, attached hereto is a copy of the original filing without the CONFIDENTIAL attachments. IGS will provide the CONFIDENTIAL attachments, upon request, to the Parties listed on the Certificate of Service, upon the execution of the appropriate documents to ensure CONFIDENTIAL treatment.

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

Very truly yours,



Todd S. Stewart
Counsel for Interstate Gas Supply, Inc.
d/b/a IGS Energy

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SECRETARY'S BUREAU

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TSS/jld

Enclosures

cc: Tony Cusati
Darren Gill, Deputy Director of Bureau of Technical Utility Services

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

CERTIFICATE OF SERVICE

I hereby certify that on this day I served a true and correct copy of the foregoing document upon the parties, listed below, in accordance with the requirements of §1.54 (relating to service by a party).

VIA FIRST CLASS MAIL:

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

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

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

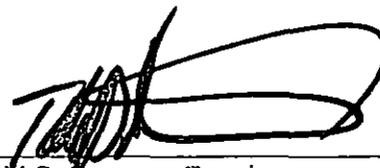
Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

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

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

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

Legal Department
FirstEnergy
2800 Pottsville Pike
Reading, PA 19612



Todd S. Stewart, Esquire

DATED: October 13, 2015

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August 17, 2015

VIA HAND DELIVERY

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

RE: Petition of Interstate Gas Supply, Inc., dba IGS Energy to Revise Its Current Bond/Security; Docket No. A-2011-2228643; **PETITION OF INTERSTATE GAS SUPPLY, INC. TO REDUCE BONDING LEVEL**

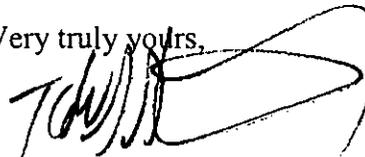
Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition of Interstate Gas Supply, Inc. to Reduce Bonding Level in the above-captioned docket. Please note that all 4 attachments to the Petition contain Proprietary business information and that IGS is requesting that they be treated as CONFIDENTIAL and not be placed in the Commission's public files. Each attachment is separately marked as being CONFIDENTIAL.

Also enclosed is a check in the amount of \$350 for the filing fee.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,



Todd S. Stewart
Counsel for Interstate Gas Supply, Inc.
d/b/a IGS Energy

PA PUBLIC UTILITY
SECRETARY'S BUREAU

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Enclosure
cc: Anthony Cusati

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of Interstate Gas Supply, Inc., dba :
IGS Energy to Revise Its Current :
Bond/Security :

Docket No. A-2011-2228645

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SECRETARY'S BUREAU

PETITION OF INTERSTATE GAS SUPPLY, INC.
TO REDUCE BONDING LEVEL

NOW COMES, Interstate Gas Supply, Inc., d/b/a IGS Energy ("IGS"), pursuant to the Pennsylvania Public Utility Commission's ("Commission") Final Order entered on July 24, 2014 at Docket Number M-2013-2393141 ("*Financial Security Order*"), and hereby requests that the Commission reduce the level of security that IGS is required to maintain with the Commission for its operations as an electric generation supplier ("EGS"), from the current 10% to 5%, based upon its last twelve months of revenue as reported to the Commission. In support of this request, IGS states and avers as follows:

1. IGS is currently licensed as an EGS for all customer classes within the Commonwealth of Pennsylvania. The EGS license was approved on May 19, 2011.
2. IGS has maintained its license in good standing and is compliant with current financial security requirements.
3. Pursuant to the *Financial Security Order*, the Commission concluded that following its first year of operations, an EGS may petition to have its bonding requirement reduced from 10% to 5% of the EGS's prior 12 months of revenue or \$250,000, whichever is

higher, so long as the revised amount still meets the other criteria set forth in 52 Pa Code § 54.40(f). *Financial Security Order* at 11-12.

4. The Commission also requested that an EGSs seeking to revise its financial security requirements and provide the following information with the request:

- Gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent 12 months;
- The amount of gross receipts taxes that the EGS has prepaid towards its estimated revenues for the current calendar year;
- Submit documentation, if the EGS is proposing to utilize a parental or corporate guarantee, that demonstrates that the guarantor meets the required long-term bond rating from two of the approved rating agencies;
- Available AEPS compliance data from the most recent 12 months; and,
- Copies of all Department of Revenue documents that support the EGS's request.

5. In support of its Petition, IGS is including the following attachments:

Attachment	Description
A CONFIDENTIAL	IGS's gross revenues for the sale of electricity to retail customers in Pennsylvania from January 1, 2012 through December 31, 2014, as evidenced by the attached copy of its annual report as filed with the Commission.
B CONFIDENTIAL	Demonstrates IGS' Gross Receipts Tax payments for 2012 through 2014.
C CONFIDENTIAL	Available AEPS compliance data from the most recent 12 months
D CONFIDENTIAL	Proof of payment of Pennsylvania other taxes for 2012-2014

6. IGS submits that this supporting documentation is consistent with the Commission's *Financial Security Order* and provides appropriate support to grant its Petition. Importantly, granting IGS's Petition will not in any way impede IGS's ability to comply with 66 Pa. C.S. § 2809(c) or 52 Pa Code § 54.40(a) which requires IGS to maintain sufficient financial security to ensure financial responsibility, the payment of gross receipts tax and the supply of

electricity at retail. Finally, granting IGS's petition will enable IGS to better allocate resources to developing retail products for the benefit of consumers.

7. IGS is prepared to work with the Commission's Bureau of Technical Utility Services to process this request and provide any additional information as may be needed.

WHEREFORE, IGS respectfully requests that the Commission grant this petition and permit IGS to maintain financial security in the amount of 5% of its last twelve months of revenue secured through a bond.

Respectfully submitted,



Todd S. Stewart
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*Counsel for Interstate Gas Supply, Inc.
d/b/a IGS Energy*

DATED: August 17, 2015

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