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June 16, 2016

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JUN 16 2016

VIA FEDERAL EXPRESS

PA PUBLIC UTILITY COMMISSION  
 SECRETARY'S BUREAU

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

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

Dear Secretary Chiavetta:

Pursuant to the Order issued on July 24, 2014 and the Secretarial Letter issued on April 8, 2016 in Docket No. M-2013-2393141, please accept this letter as Champion Energy Services, LLC's ("Champion") Annual Petition for Renewal of its Bond Reduction. Champion has enclosed the requisite \$350 filing fee.

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

- Champion's gross receipts for the most recent four quarters (Attachment A);
- a Tax Letter of Good Standing form the Department of Revenue (Attachment B);  
and
- proof of service of the petition on the statutory advocates and affected EDCs (Attachment C).

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

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ATLANTA AUSTIN GENEVA HOUSTON LONDON NEW YORK SACRAMENTO WASHINGTON D.C.

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,



James E. Guy

*Attorney for Champion Energy Services, LLC*

JEG/js

ATTACHMENT A

Gross Receipts

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ATTACHMENT B

Tax Letter of Good Standing

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**ATTACHMENT C**  
**Certificate Of Service**

I hereby certify that I have this day served by U.S. Mail a true copy of Champion Energy Services, LLC's Request to Amend Electric Generation Supplier License Application (excluding confidential attachments) upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Tanya J. McCloskey  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120

Office of Trial Staff  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

John R. Evans  
Office of the Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101

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

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

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

Legal Department  
First Energy  
2800 Pottsville Pike  
Reading, PA 19612

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

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

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

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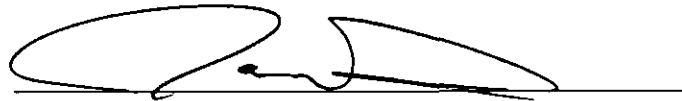
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Citizens' Electric Company  
Attn: EGS Coordination  
1775 Industrial Boulevard  
Lewisburg, PA 17837

Director of Customer Energy Services  
Orange and Rockland Company  
390 West Route 59  
Spring Valley, NY 10977-5300

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

Date this 16 day of June 2016.

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

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

ORIGIN ID:AUSA (512) 721-2705  
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SUTHERLAND ASBILL & BRENNAN LLP  
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UNITED STATES US

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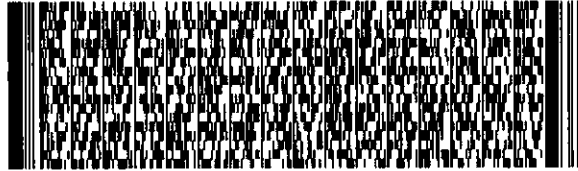
TO ROSEMARY CHIAVETTA, SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMMISS  
400 NORTH ST

HARRISBURG PA 17120

(609) 341-9188  
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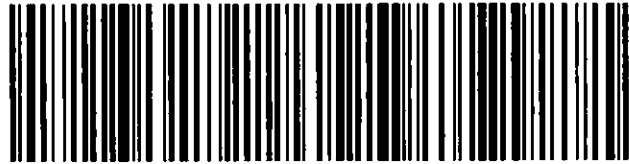
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