



July 11, 2017

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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  
Annual Petition for Renewal of Bond Reduction  
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, Champion Energy Services, LLC ("Champion") please accept this letter as Champion's Annual Petition for Renewal of its Bond Reduction. A payment of \$350 has been separately mailed from our parent company, Calpine.

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

- Champion's gross receipts for the sale of electricity to retail customers in Pennsylvania for the most recent four quarters (Attachment A);
- a Tax Letter of Good Standing form the Department of Revenue (Attachment B);
- proof of prepaid gross receipt taxes towards Champion's estimated revenues for the current year (Attachment C);
- proof of service of the petition on the statutory advocates and affected EDCs (Attachment D); and
- AEPS compliance documentation (Attachment E).



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 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 of this cover letter for our records. Please date-stamp the extra copy and return it at your earliest convenience using the enclosed self-addressed, stamped envelope. Thank you for your assistance, and please contact me if you have any questions regarding this matter.

Respectfully submitted,

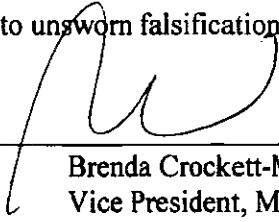
A handwritten signature in cursive script that reads "Isabel Montalvo".

Isabel Montalvo  
Regulatory Affairs Analyst

**VERIFICATION**

I, Brenda Crockett-McNew, Vice President, Market Development and Regulatory Affairs for Champion Energy Services, LLC, hereby state that the facts above set forth 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).

DATED: July 11, 2017

  
\_\_\_\_\_  
Brenda Crockett-McNew  
Vice President, Market Development and  
Regulatory Affairs

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**ATTACHMENT A**  
**Gross Receipts**

As shown below, Champion's gross revenues for the sale of electricity to retail customers for the most recent 12 months totaled \$181,237,277.36, 5 percent of which is \$9,061,863.86. Champion is therefore requesting the Commission to authorize it to change the current letter of credit to \$9,100,000.00. Champion is not requesting a change to the form of security currently used to satisfy the bonding requirement.

		<b>Retail Electric Sales Revenue</b>	<b>Gross Receipts Tax</b>	<b>Gross Receipts</b>
Q3	Jul-16			
	Aug-16			
	Sep-16			
Q4	Oct-16			
	Nov-16			
	Dec-16			
Q1	Jan-17			
	Feb-17			
	Mar-17			
Q2	Apr-17			
	May-17			
	Jun-17			
Total:				

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**ATTACHMENT B**  
**Tax Letter of Good Standing**

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Bureau of Compliance  
P.O. Box 280946  
Harrisburg, PA 17128-0946  
[www.revenue.pa.gov](http://www.revenue.pa.gov)



Friday, June 23, 2017

Attention: Brenda Crockett-McNew

RE: Champion Energy Services LLC  
1500 Rankin Road  
Suite 200  
Houston TX 77073



Sincerely,



PA Department of Revenue,  
Bureau of Compliance,  
Business License Clearance Division

Hearing Impaired and/or Speaking Needs  
Call TTY 800-447-3020

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**ATTACHMENT C**  
**Proof of Prepaid Gross Receipt Taxes**

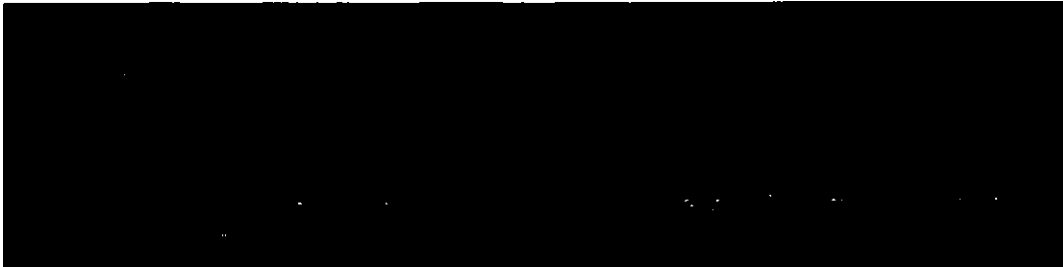
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• Payment Successfully Submitted.

### RCT-SPEC Specialty Tax Payment



Filed By	Transaction ID	Tax Return Status
Julia Stafford	1317000001581851	Complete

Payment Method: ACH Debit (EFT) Payment Through e-TIDES

[Return](#)



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**ATTACHMENT D**  
**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

Pennsylvania Office of Attorney General  
16th Floor, Strawberry Square  
Harrisburg, PA 17120

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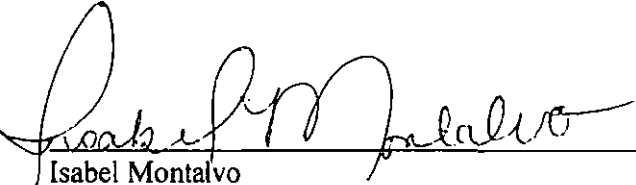
Citizens' Electric Company  
Attn: EGS Coordination  
1775 Industrial Boulevard  
Lewisburg, PA 17837

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

Pennsylvania Department of Revenue  
PO Box 280407  
Harrisburg, PA 17128-0407

Dated this 11th day of July 2017.

  
Isabel Montalvo  
Regulatory Affairs Analyst

**ATTACHMENT E**  
**AEPS Compliance Documentation**

Champion has not finalized the most recent 12 months of AEPS compliance (due September 1, 2017) and will supplement this filing if needed once the final purchases have been completed. However, Champion is providing AEPS compliance data for the period of June 2015 through May 2016 and the email from the AEPS coordinator stating compliance for energy year 2016.

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Calpine Energy Services, L.P. (Champion) - My RPS Compliance - PA - Jun 2015 - May 2016

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Total Generation for Subaccount	PA Solar	PA Tier I	PA Tier II	Total Certificates Used for RPS



# PENNSYLVANIA ALTERNATIVE ENERGY CREDIT PROGRAM

Via Email to *Calpine Energy Services, L.P. (Champion)*  
*bcrockett@championenergyservices.com*

3 May 2017

Dear Pennsylvania Electric Supplier:



Best,

Pennsylvania AEPS Administration Team

### View/Print Label

1. **Print the label:** Select the print icon in your PDF Reader window to print the label below.
2. **Fold the printed label at the dotted line.** Place the label in a FedEx Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

FOLD HERE

ORIGIN ID: MIFA (281) 653-0050  
ISABEL MONTALVO  
CALPINE - CHAMPION ENERGY SERVICES  
1500 RANKIN RD, STE 200

HOUSTON, TX 77073  
UNITED STATES US

SHIP DATE: 12JUL17  
ACTWGT: 1.00 LB  
CAD: 100844866/WWSX12300

BILL THIRD PARTY

TO

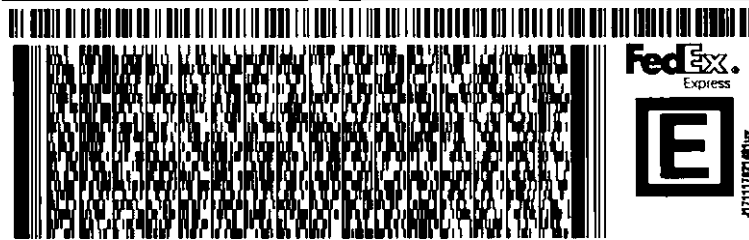
**PENNSYLVANIA PUBLIC UTILITY COMMISS  
KEYSTONE BUILDING, 2ND FLOOR ROOM N**

**HARRISBURG PA 17120**

(281) 653-0050  
INV ARG01032486  
PO

REF: 30520-3270

DEPT



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**THU - 13 JUL 10:30A  
PRIORITY OVERNIGHT**

TRK# 7871 6965 0980  
0201

**XH MDTA**

**17120  
PA-US MDT**

