



ATTORNEYS AT LAW

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August 31, 2017

**VIA ELECTRONIC FILING**

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

RE: Docket No. A-2011-2228643; Utility Code: 1113238; **SERVICE OF LETTER REGARDING REDUCED BONDING/SECURITY LEVEL FOR INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

Please find attached for filing with the Commission, a Certificate of Service demonstrating that we have served Interstate Gas Supply's August 4, 2017 and August 15, 2017 filings (also attached) in the above-referenced matter upon the required parties.

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*

TSS/jld

Enclosures

cc: Jeff McCracken (via email – [jmccracken@pa.gov](mailto:jmccracken@pa.gov))  
Tony Cusati

**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  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120

Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101-1303

Office of Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 14<sup>th</sup> 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: Kimberly Klock  
PPL  
Two North Ninth Street  
Allentown, PA 18108-1179

Legal Department  
First Energy Corporation  
2800 Pottsville Pike  
Reading PA, 19612



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Todd S. Stewart, Esquire

DATED: August 31, 2017



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August 4, 2017

**VIA HAND DELIVERY**

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

RE: Docket No. A-2011-2228643; Utility Code: 1113238; **REDUCED BONDING/SECURITY LEVEL FOR INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

On August 17, 2015, Interstate Gas Supply, Inc. ("IGS") filed a Petition with the Pennsylvania Public Utility Commission ("Commission") seeking a reduction in the level of its required bond from 10% to 5% of its most recent twelve (12) months of revenue, pursuant to the Commission's Order entered July 24, 2014, Docket No. M-2013-2393141. By Secretarial Letter issued on November 6, 2015, the Commission granted IGS' request and allowed it to reduce its bond to 5% of gross annual operating revenues. On October 6, 2016, IGS made a similar filing, requesting that the Commission continue its required bonding level at 5% for the subsequent 12-month period. That request was made at the same docket. IGS' request was granted by Secretarial Letter dated November 23, 2016.

The purpose of this letter is to request that the Commission extend the reduced bonding level of 5% for IGS, for 12-months following the expiration of its current bond. IGS avers that it continues to qualify for the reduced level. By this letter, IGS transmits the appropriate information to the Commission so that the Commission may review its request.

IGS also requests that this Letter and the attachments hereto be treated as **CONFIDENTIAL** by the Commission as the documents contain competitively sensitive information. Accordingly, attached find the following **CONFIDENTIAL** attachments previously required by the Commission when considering such requests:

- 1) A Letter from the APES Administrator indicating IGSS compliance with all AEPS requirements;
- 2) Proof of payment of Pennsylvania Gross Receipts taxes for 2016;

- 3) Form REV-423 indicating that IGS has prepaid its Gross Receipts Tax for 2017;
- 4) A spreadsheet showing gross revenue for each of the EDC service territories for the twelve (12) month period;
- 5) A Letter from the Ohio Department of State indicating that IGS has been incorporated in the state of Ohio since August 9, 1989;
- 6) A Letter from the Pennsylvania Department of State indicating that IGS is in good standing and has no outstanding fees or penalties in Pennsylvania; and,
- 7) A check in the amount of \$350 for the filing fee.

IGS is aware that the Commission also requires a letter from the Pennsylvania Department of Revenue indicating that the supplier is in good standing with that Department. A request for such letter has been made and the letter will be provided to the Commission as soon as it is received. Accordingly, IGS requests that its financial security requirements remain at the current 5% level for the coming year. IGS has a current Bond that will expire in November of 2017 and IGS will renew that Bond upon the Commission's disposition of this request.

If you have any questions concerning this matter, please do not hesitate to contact me.

Very truly yours,



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

TSS/jld

**Attachments**

cc: Per Certificate of Service  
Tony Cusati  
Stephen Jakab, Bureau of Technical Utility Services



Todd S. Stewart  
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August 15, 2017

**VIA ELECTRONIC FILING**

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

RE: Docket No. A-2011-2228643; Utility Code: 1113238; **REDUCED BONDING/SECURITY LEVEL FOR INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

On August 4, 2017, Interstate Gas Supply, Inc. ("IGS") filed a letter request to continue the current reduced level of its electric generation supplier ("EGS") bond, for the 12-month period following the expiration of its current bond in November 2017. Along with the August 4, 2017 filing, IGS included the documentation required by the Commission to accompany such a request. However, as noted in the letter, one piece of information was absent because it had not yet been received from the Pennsylvania Department of Revenue, namely, a letter of good standing with that Department. That letter has since been provided to IGS and a copy is attached here for the Commission's consideration.

If you have any questions concerning this matter, please do not hesitate to contact me.

Very truly yours,

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

TSS/das  
Attachment

cc: Tony Cusati  
Stephen Jakob, Bureau of Technical Utility Services

# Commonwealth Contractor Responsibility Program Clearance Certificate

Federal Identification Number 31-1286758

Certificate Number HCC 24516

Business Name INTERSTATE GAS SUPPLY INC

Trade Name



THE PA DEPARTMENT OF REVENUE CERTIFIES THAT THE INFORMATION ON OUR RECORDS AS OF 8/14/2017  
REFLECTS THE FOLLOWING:

- Yes ALL STATE TAX REPORTS HAVE BEEN FILED AND ALL STATE TAXES PAID;
- No ALL STATE TAXES DUE ARE SUBJECT TO A TIMELY ADMINISTRATIVE OR JUDICIAL APPEAL;
- No ALL STATE TAXES DUE ARE SUBJECT TO A DULY APPROVED DEFERRED PAYMENT PLAN.

THIS CERTIFICATE IS ISSUED IN ACCORDANCE WITH MANAGEMENT DIRECTIVE 215.9, BASED ON FACTS  
PRESENTLY KNOWN BY THE DEPARTMENT OF REVENUE.

THIS CERTIFICATE CANNOT BE USED AS AN ESTOPPEL AGAINST THE DEPARTMENT IF FURTHER FACTS BECOME  
KNOWN TO THE DEPARTMENT. THIS CERTIFICATE DOES NOT REPLACE THE REQUIREMENT OF SECURING A "BULK  
SALE CLEARANCE CERTIFICATE" UNDER THE PROVISIONS OF SECTION 1403 OF THE FISCAL CODE OR ANY OTHER  
SIMILIAR CERTIFICATE OR DOCUMENT ISSUED BY THE DEPARTMENT OF REVENUE.

A handwritten signature in black ink, appearing to be "WJP", written over a horizontal line.

PA DEPARTMENT OF REVENUE

8/14/2017

Valid for 15 days after issue date