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PA PUC SECRETARY'S BUREA' FRONT DESK

Sarah C. Stoner 717.237.6026 sstoner@eckertseamans.com

September 12, 2017

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor, Room-N201 Harrisburg, PA 17120

RE: Letter Petition of Reliant Energy Northeast LLC dba NRG Home and NRG Business ("REN") for Continuation of 5% Reduction in Security Requirements; Docket No. A-2010-2192350

Dear Secretary Chiavetta:

Please accept this Letter Petition on behalf of Reliant Energy Northeast LLC dba NRG Home and NRG Business ("REN") to renew its required level of financial security at the reduced level of 5%. This request is made pursuant to the Commission's Bond Reduction Order¹ and is being submitted at least 90 days prior to the expiration date of REN's current security. REN's current required level of financial security was initially approved by the Commission through its Secretarial Letter dated December 15, 2015. The reduction to 5% was continued by the Commission through Secretarial Letter dated September 29, 2016.

Please find the following information in support of REN's request:

- 1) REN's gross receipts in Pennsylvania for the four most-recent quarters attached hereto as Appendix A (CONFIDENTIAL);
- 2) REN is current with its tax liabilities to the Commonwealth of Pennsylvania and is providing (a) proof of its prepaid gross receipts taxes toward its estimated revenues for the current year and (b) a Tax Status Letter from the Pennsylvania Department of Revenue, which are both attached hereto as Appendix B (CONFIDENTIAL); and
- 3) REN's Alternative Energy Portfolio Standards compliance data is attached hereto as Appendix C (CONFIDENTIAL).

Please note that the confidential attachments to this Letter Petition are being provided to the Commission under seal and it is requested that they be maintained in a non-public folder.

Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers: Acceptable Security Instruments, Docket No. M-2013-2393141, Final Order entered July 24, 2014. {L0699694.2}

Enclosed please find a verification attesting to the truthfulness of facts set forth in this request. Also enclosed is a check in the amount of \$350.00 for the required filing fee for this Letter Petition. The statutory advocates, the Commission's Bureau of Investigation & Enforcement, the Office of Attorney General, the Pennsylvania Department of Revenue and pertinent electric distribution companies have been served with a copy of this Letter Petition as evidenced by the enclosed Certificate of Service.

Thank you for your attention to this matter. Should you have any questions or concerns regarding this matter, please feel free to contact me.

Sincerely,

Sarah C. Stoner

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cc: Stephen Jakab, Bureau of Technical Utility Services (with appendices)

Certificate of Service (without appendices)



VERIFICATION

I, Mike Starck for Reliant Energy Northeast LLC hereby verify that I am authorized to and do make this Verification for it, and that the facts set forth in the foregoing Letter Petition are true and correct to the best of my knowledge, information and belief, and that I expect to prove the same at any hearing 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).

Soplember 11.2017
Date

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CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Reliant Energy Northeast LLC dba NRG

Home and NRG Business' Letter Petition for Continuation in 5% Reduction in Security

Requirements upon the persons listed below in the manner indicated in accordance with the

requirements of 52 Pa. Code Section 1.54.

Via First Class Mail

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

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

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

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

Met-Ed, Penelec, and Penn Power: Legal Department First Energy 2800 Pottsville Pike Reading, PA 19612

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

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

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

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

Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West P.O. Box 3265 Harrisburg, PA 17105-3265

Pennsylvania Department of Revenue Bureau of Compliance Fourth and Walnut Streets First Floor, Strawberry Square Harrisburg, PA 17120

Sarah C. Stoner, Esq.

Dated: September 12, 2017