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January 23, 2018

Via Hand Delivery

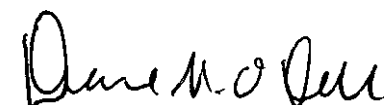
Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Green Mountain Energy Company to Revise Its Required Level of Financial Security, Docket No. A-2011-2229050

Dear Secretary Chiavetta:

On behalf of Green Mountain Energy Company enclosed for filing please find the original Petition to Revise Its Required Level of Financial Security regarding the above matter. Please note the attachments to the Petition are *confidential* and should be handled accordingly. Also enclosed is a check in the amount of \$350 for the filing fee. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Cert. of Service w/enc.

PA P.U.C.
SECRETARY'S BUREAU

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Energy :
Company to Revise Its Required Level of : Docket No. A-2011-2229050
Financial Security

PETITION OF GREEN MOUNTAIN ENERGY COMPANY

Pursuant to the Commission's Final Order entered on July 24, 2014 at Docket Number M-2013-2393141 ("*Financial Security Order*"), Green Mountain Energy Company ("Green Mountain") requests that the Commission reduce the level of security it is required to maintain with the Commission from the current 10% to 5% of its last twelve months of revenue. Green Mountain is not seeking any changes to the current financial security instrument utilized to meet this requirement and, if approved, would submit a revised instrument. In support of this request, Green Mountain states as follows:

1. Green Mountain is currently licensed as an electric generation supplier ("EGS") for all customer classes within the Commonwealth of Pennsylvania. The EGS license was approved on June 10, 2011.
2. Green Mountain has maintained its license in good standing and is compliant with its current financial security requirements.
3. Pursuant to the *Financial Security Order*, the Commission concluded that an EGS, following its first year of operations, may petition to have its bonding requirement reduced from 10% to 5% of the EGS's last 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 EGSs seeking to revise their financial security requirements 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;
- Available AEPS compliance data from the most recent 12 months; and.
- Copies of all Department of Revenue documents that support the EGS’s request (i.e., Gross Receipts Tax Returns for the prior three years).

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

Attachment	Description
A CONFIDENTIAL	Green Mountain’s gross revenues for the sale of electricity to retail customers in Pennsylvania from January 1, 2017 through December 31, 2017
B CONFIDENTIAL	PA Form REV-423 Specialty Taxes Estimated Payment Coupon
C CONFIDENTIAL	Letter from PA Department of Revenue proving compliance with state taxes
D CONFIDENTIAL	Letter from AEPS Administrator proving compliance with PA AEPS requirements

6. Green Mountain submits that this supporting documentation is consistent with the Commission’s *Financial Security Order* and provides appropriate support to grant its Petition. Importantly, granting Green Mountain’s Petition will not in any way impede Green Mountain’s ability to comply with 66 Pa. C.S. § 2809(c) or 52 Pa Code § 54.40(a) which requires Green Mountain to maintain enough financial security to ensure financial responsibility, the payment of gross receipts tax and the supply of electricity at retail. Finally, granting Green Mountain’s petition will enable Green Mountain to better allocate resources to developing retail products for the benefit of consumers.

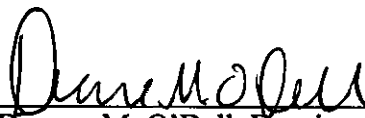
7. As Green Mountain is not seeking any revision to its current financial security instrument, if this Petition is approved, then Green Mountain will submit a newly revised bond to the Commission to replace the one currently in effect.

8. Green Mountain is prepared to work with the Commission's Bureau of Technical Utility Services to process this request and provide any additional input as needed.

9. Green Mountain has served a non-confidential version of this Petition on all the statutory agencies and the electric distribution companies as evidenced by the Certificate of Service accompanying this Petition.

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

Respectfully submitted,



Deanne M. O'Dell, Esquire

Attorney ID 81064

Sarah C. Stoner, Esquire

Attorney ID 313793

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213 Market St., 8th Floor

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717.237.6000

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Date: January 23, 2018

Attorneys for Green Mountain Energy Company

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VERIFICATION

I, Mark Parsons, hereby state that I am Vice President of Green Mountain Energy Company and am authorized to make this verification on its behalf. The facts set forth in the foregoing Petition 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 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).

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Dated _____

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CERTIFICATE OF SERVICE

I hereby certify that this day I served a non-confidential copy of Green Mountain Energy's Petition for a Reduced Financial Security Requirement 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

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

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

Legal Department
Attn: Kimberly Klock
PPL
Two North Ninth Street
Allentown, PA 18108-1179

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

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

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

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

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

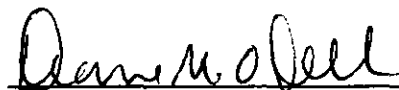
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
P.O. Box 3265
Harrisburg, PA 17105-3265

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

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

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



Deanne M. O'Dell, Esq.
Dated: January 22, 2018