

MidAmerican Energy Services, LLC 4299 NW Urbandale Drive Urbandale, Iowa 50322

March 28, 2018



MAR 2 8 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

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

> Re: Petition of MidAmerican Energy Services, LLC for Reduction in Bonding Requirement; Docket No. A-2015-2496354

Dear Secretary Chiavatta:

Enclosed for filing is one copy of the Petition of MidAmerican Energy Services. LLC for Reduction in Bonding Requirement (Public Version Excluding Confidential Appendix A, Exhibit I) in the above captioned matter.

The Petition is a public document; however, we are also filing a confidential version which will include Confidential Appendix A, Exhibit I. A check for the \$350 filing fee has been sent via UPS under separate cover.

Copies have been served on all parties as indicated in the attached certificate of service.

Sincerely,

Paul J. Leighton Characterican Energy Services, LLC

Enclosure: Certificate of Service



MAR 2 8 2018

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Petition of MidAmerican Energy
Services LLC For Reduction in
Bonding Requirement

Docket No. A-2015-2496354 (P-2018-____)

PETITION OF MIDAMERICAN ENERGY SERVICES, LLC FOR REDUCTION IN BONDING REQUIREMENT

:

:

:

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

MidAmerican Energy Services, LLC ("MES"), files this Petition for Reduction in Bonding Requirement pursuant to the Commission's Final Order in the matter of *Bonding/Security Requirements for Electric Generation Suppliers*, Docket No. M-2013-2393141 (Order adopted July 24, 2014) ("*Bond Reduction Order*") and in accordance with the Secretarial Letter issued on April 8, 2016 at the same docket number ("*Bond Reduction Secretarial Letter*"). Effective October 1, 2016, MES specifically requests approval to reduce its financial security requirement with the Commission to a level equal to 5 percent of its most recent 12 months of gross revenues for electricity sales in Pennsylvania. In support hereof, MES avers as follows:

1. On July 8, 2015, MES filed an EGS application, which was approved by the Commission on October 1, 2015 at Docket No. 2015-2496354 ("*MES Licensing Order*"). In that application, MES explained that MEC's unregulated retail services division initially entered competitive retail markets in 1999 and has been serving electric customers in Pennsylvania since 2011 under *MEC Licensing Order I*. MES further noted that due to the evolution of the unregulated retail services division's competitive market activities, corporate leadership determined that the division would be transferred to an affiliate within Berkshire Hathaway Energy. This new company is MES, which now holds an EGS license and is authorized by the

MES Licensing Order to serve all customers classes in all electric distribution company ("EDC") service territories throughout Pennsylvania.

2. Under the *Bond Reduction Secretarial Letter*, the Commission directed EGSs seeking renewal of security reductions to provide documentation at least 90 days prior to the current security's expiration date. This documentation must include a petition for renewal; a \$350 filing fee; proof of service of the petition on the public advocates and affected EDCs; a tax letter of good standing from the Department of Revenue ("DOR") relating to the payment of gross receipts taxes; and the company's gross receipts for the most recent four quarters.

3. The information required by the *Bond Reduction Secretarial Letter* is set forth in **Confidential Appendix A** attached to this Petition and demonstrates that MES is in good standing with DOR.

4. MES stands ready to supplement this information as may be required by the Commission to process this Petition.

WHEREFORE, MidAmerican Energy Services, LLC respectfully requests the issuance of a Secretarial Letter approving a reduction in the level of MES' bond to equate to 5% of its gross revenues from retail electricity sales in Pennsylvania for the most recent 12 months, effective July 1, 2018.

Respectfully submitted,

Dated: March 28, 2018

Laul

Paul J. Leighton MidAmerican Energy Services, LLC 666 Grand Avenue, 27th Floor Des Moines, IA 50309-2580

2

RECEIVED

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

:

:

MAR 282018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Petition of MidAmerican Energy Services LLC For Reduction in Bonding Requirement

Docket No. A-2015-2496354

(P-2018-____)

CERTIFICATE_OF SERVICE

I hereby certify that I have this day served a true 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

Small Business Advocate Commerce Building, Suite 1102 300 North Second Street Harrisburg, PA 17101

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

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

Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946 Legal Department

Attn: Paul Russell PPL Two North Ninth Street Allentown, PA 18108-1179

Director of Customer Energy Services Orange and Rockland Company 390 West Route 59 Spring Valley, NY 10977-5300 Office of Competitive Market Oversight Pennsylvania Public Utility Commission Commonwealth Keystone Building 3rd Floor, Room N-309 Harrisburg, PA 171 US

Bureau of Technical Utility Services Pennsylvania Public Utility Commission Commonwealth Keystone Building 3id Floor Harrisburg, PA 171115

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

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

Regulatory Affairs Duquesne Light Company 411 Seventh Street, MD 16-4 Pittsburgh, PA 5219 UGI Utilities, Inc. Attn: Rates Dept. — Choice Coordinator 2525 N. 12'h Street, Suite 360 P.O. Box 12677 Reading, PA 19612-2677

Manager Energy Acquisition PECO Energy Company 2301 Market Street Philadelphia, PA 19101-8699 Legal Department First Energy 2800 Pottsville Pike Reading, PA 19612

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

Dated this 28th day of March 2018.

Paul J. Leighton CA Attorney for MidAmerican Energy Services, LLC

Extremely Urgent	This envelope is for use with the following services:	UPS Next Day Air® UPS Worldwide Express™ UPS 2nd Day Air®
 Visit ups.com® or call 1-800-PICK-UPS® (1-800-742-5 to schedule a pickup or find a drop off location near yop Domestic Shipments To qualify for the Letter rate, UPS Express Envelopes may only contain correspondence, urgent documents, and/or electronic media, and must weigh 8 oz. or less. UPS Express Envelopes containing items other than those listed or weighing more than 8 oz. will be billed by weight. International Shipments The UPS Express Envelope may be used only for documents of no comn value. Certain countries consider electronic media as documents. Visit ups.com/importexport to verify if your shipment is classified as a docu To qualify for the Letter rate, the UPS Express Envelope must weigh 8 oz. 	DEB BORCHERT 0.3 LBS LTR 1 OF 1 (515) 242 - 3406 MIDAMERICAN ENERGY COMPANY 666 GRAND AVE DEG MOINES 1A 50303 SHIP TO: ROSEMARY CHIAVETTA - SECRETARY PA PUBLIC UTILITY COMMISSION 2ND FLOOR 400 NORTH STREET HARRISBURG PA 17120	Apply shipping documents on ti Do not use this envelope for: UPS Ground UPS Standard UPS 3 Day Select® UPS Worldwide Expedited®
UPS Express Envelopes weighing more than 8 oz. will be billed by weigh Note: Express Envelopes are not recommended for shipments of electron containing sensitive personal information or breakable items. Do not sen- or cash equivalent.	PA 171 9 − 20	
	UPS NEXT DAY AIR TRACKING #: 12 532 972 01 7034 4442 1 Image: State of the state of t	·
Ū.	REF 1: PER DEB BORCHERT WE 20.0.20 Zebre ZP 450 97.0A 01/2018 SE NOTICE ON REVERSE regarding UPS Terms and notice of Anticipand facility. Where allowed by law, thipper accounts UPS to act to fair any operation of the U.S. Information of activity. Where allowed by law, thipper accounts up operation of the U.S. Information of activity where allowed by law, thipper accounts up operation of the U.S. Information of	than 100 years

.

100% Recycled fiber 80% Post-Consumer

•

International Shipping Notice — Carriage hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention of the Convention of the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention of the Convention of the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention of the Convention of the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited.