

May 24, 2018

## Via E-Filing

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

RE: Petition of UGI Energy Services, LLC to Reduce its Bonding Requirement; Docket No. A-2013-2369288

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of UGI Energy Services, LLC ("UGIES") to reduce its bonding requirement ("Petition"). The Petition is filed in accordance with the Commission's final order entered on July 24, 2014 at Docket No. M-2013-2393141. UGIES has enclosed the required filing fee in the amount of \$350.00

In support of this Petition, UGIES is submitting the following documents:

- 1. A report of UGIES' gross revenues from the sale of electricity to retail customers in Pennsylvania for the most recent 12 months (Appendix A); and
- 2. Two requests for the Tax Letter of Good Standing for UGIES (Appendix B).

Please contact me at 610-768-3625 if you have any questions regarding this filing.

Sincerely,

Frank H. Markle Senior Counsel

Frank H. Marlle

**UGI** Corporation

Attorney for UGI Energy Services, LLC

Enclosures

Cc: Certificate of Service

Stephen Jakab, TUS

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of UGI Energy Services, LLC To Reduce Its Bonding Requirement

Docket No: A-2013-2369288

# PETITION OF UGI ENERGY SERVICES, LLC TO REDUCE ITS BONDING REQUIREMENT

:

UGI Energy Services, LLC ("UGIES) hereby files the instant Petition to Reduce its

Bonding Requirement as a licensed electric generation requirement pursuant to the Pennsylvania

Public Utility Commission's ("Commission") Final Order, at Docket No. M-2013-2393141

entered July 24, 2014 ("Bond Order"). In support thereof, UGIES states as follows:

- UGIES is a licensed electric generation supplier ("EGS) in the Commonwealth of Pennsylvania.
- 2. UGIES has been a licensed EGS for more than one year. It was originally licensed as a corporation in 1998 at Docket No. A-110076 and then relicensed after converting its form of organization to a limited liability company in 2013 at Docket No. A-2013-2369288. UGIES has maintained its license in good standing since that time.
- 3. UGIES is compliant with its current bonding requirements.
- 4. In the Bond Order, the Commission held 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 greater. (Bond Order, pp. 17-18).

<sup>&</sup>lt;sup>1</sup> Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments, Docket No. M-2013-2393141 (Order entered July 24, 2014).

- 5. Through this petition, UGIES seeks to reduce its bonding requirement to \$250,000. UGIES submits that such reduction is appropriate in light of UGIES' long history of successful operation as an EGS in Pennsylvania and its financial stability. The Commission granted UGIES' similar request in 2017 and there has been no cause for the Commission to call on the bond to meet any unsatisfied obligation of UGIES as an EGS.
- 6. UGIES is including the following information with this petition: (i) a report of UGIES' gross revenue from the sale of electricity to retail customers in Pennsylvania for the most recent four quarters is attached as Appendix A; and (ii) Documents showing UGIES' efforts to obtain a Tax Letter of Good Standing from the Pennsylvania Department of Revenue are attached as Appendix B. In the interest of time, UGIES is filing this Petition prior to receiving the required letter from the Pennsylvania Department of Revenue. UGIES will supplement its Petition with this information as soon as it is received.
- 7. As directed by the Bond Reduction Order, UGIES anticipates working with the Commission's Bureau of Technical Utility Services ("TUS") to process this Application and welcomes TUS's input and guidance for this bond reduction.
- 8. After coordination with TUS and upon approval of the reduction, UGIES will make a compliance filing with the new bond reflecting the reduced bond amount.

UGI Energy Services, LLC therefore respectfully requests that the Pennsylvania

Public Utilities Commission, in accordance with the Bond Order, grant the instant

Petition and approve a reduction to its bonding requirements.

Respectfully Submitted,

Frank H. Marth

Frank H. Markle Senior Counsel

**UGI** Corporation

Attorney for UGI Energy Services, LLC

Dated: May 24, 2018

#### VERIFICATION

I, Andrew S. Koehler, hereby state that they facts set forth above 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).

Andrew S. Koehler

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Controller

Date: May 24, 2018

# APPENDIX A

UGIES Gross Revenues for the Sale of Electricity to Retail Customers in Pennsylvania for the Most Recent Twelve Months

UGI Energy Services, LLC
Gross Revenues for Sale of Electricity to Retail Customers in PA

Period	Billed Revenue	Quarter	Total
Apr-17	\$2,643,047.70		
May-17	\$2,782,566.87	2nd Q	\$8,517,603.65
Jun-17	\$3,091,989.08		=
Jul-17	\$3,266,108.46		
Aug-17	\$3,468,030.54	3rd Q	\$9,278,418.33
Sep-17	\$2,544,279.33		
Oct-17	\$2,480,121.72		
Nov-17	\$4,715,953.38	4th Q	\$10,394,639.94
Dec-17	\$3,198,564.84		
Jan-18	\$4,907,200.99		
Feb-18	\$3,894,365.96	1st Q	\$12,697,980.25
Mar-18	\$3,896,413.30		

April 2017 thru March 2018 Total

\$40,888,642.17

# APPENDIX B

Requests for Tax Good Standing Certificate for UGIES

One Meridian Blvd, Suite 2C01 Wyomissing, PA 19610 Phone: 610-373-7999 ext. 1143 jsonon@ugies.com





То:	Business License Clearance Division	From:	Jamie Sonon	
Fax:	717-783-6055	Date:	May 5, 2018	
Phone:		Pages:	2 (including cover page)	
Re:	Tax Status Request	CC:		

#### •Comments:

Please see the attached letter for a tax status request.

Thank you,

Jamie Sonon



May 2, 2018

Pennsylvania Department of Revenue Bureau of Compliance Business License Clearance Division PO Box 281230 Harrisburg, PA 17128-1230

RE:

Letter of Tax Status

To Whom It May Concern:

UGI Energy Services, LLC respectfully requests a tax status.

UGI Energy Services, LLC authorizes you to research the following tax accounts:

FEIN: 46-2506629

Revenue ID Number: 1000696759 Sales Tax Account Number: 86-141 424

Employer Withholding Account Number: 9545 8610

Name of Entity: UGI Energy Services, LLC

Address:

One Meridian Blvd., Suite 2C01

Wyomissing, PA 19610

Contact Name: Jamie Sonon, Manager of Statutory Compliance

Contact Number: 610-373-7999 ext. 1143

Fax Number: 610-374-4288

If you need any additional information or have any questions, please contact Jamie Sonon at 610-373-7999 ext. 1143.

Sincerely,

Andrew Koehler Controller

Officer of UGI Energy Services

610-373-7999

Addressee	Start Time	Time	Prints	Result	Note
17177836055	05-04 10:41	00:00:47	002/002	OK	

Note

TMR:Timer TX, POL:Polling, ORG:Original Size Setting, FME:Frame Erase TX, PDG:Page Separation TX, MIX:Mixed Original TX: CALL:Manual TX, CSRC:CSRC; FWD:Polling PricC-FAX; BND:Double-Sided Binding Direction, Sp:SDC:CSRC; Original, FDDE:F-code, RTX:Re-TX, RLY:Relay, MBX:confidential, BUL:Bulletin, SIP:SIP Fax, IPADR:IP Address Fax, I-FAX:Internet Fax

Result

OK: Communication OK, S-OK: Stop Communication, pw-OFF: Power Switch OFF,
TEL: RX from TEL, NG: Other Error, Cont: Continue, No Ans: No Answer,
Refuse: Receipt Refused, Busy: Busy: Note: Note: No Answer,
POUR: Receiving page Over, FIL: File Error, DC: Decode Error, MDN: MDN Response Error, PRINT: Compulsory Memory Document Print;
DSN: DSN Response Error, PRINT: Compulsory Memory Document Print;
DEL: Compulsory Memory Document Delete, SEND: Compulsory Memory Document Send.

One Meridian Blvd, Suite 2C01 Wyomlssing, PA 19610 Phone: 610-373-7999 ext, 1143 Jsonon@ugies.com



# Fax

Re:	Tax Status Request	CC:	
Phone:		Pages:	2 (including cover page)
Fax:	717-783-6055	Date:	May 4, 2018
To:	Business License Clearance Division	From:	Jamie Sonon

·Comments

Please see the attached letter for a tax status request.

Thank you, Jamie Sonon X 2ND PEQUEST X

One Meridian Blvd, Suite 2C01 Wyomissing, PA 19610 Phone: 610-373-7999 ext. 1143 jsonon@ugies.com



# Fax

То:	Business License Clearance Division	From:	Jamie Sonon	
Fax:	717-783-6055	Date:	May 4, 2018	
Phone	*	Pages:	2 (including cover page)	
Re:	Tax Status Request	CC:		

#### •Comments:

Please see the attached letter for a tax status request.

Thank you,

Jamie Sonon

JSONON @ UGHES COM

THAM YOU!

P 1 05/21/2018 16:49 Serial No. A2XK011003424 TC: 756212

Addressee	Start Time	Time	Prints	Result	Note
17177836055	05-21 16:48	00:00:49	002/002	OK	

Note

IMM:Timer TX, POL:Polling, ORG:Original Size Setting, FME:Frame Erase TX, DPG:Page Separation TX, MIX:Mixed Original TX. CALL:Manual TX, CSRC:CSRC, -WD:Forward, PC:PC-FAX, BND:Double-Sided Binding Direction, SP:Special Original, -CODE:F-COde, RTX:Re-TX, RLY:Relay, MBX:Confidential, BUL:Bulletin, SIP:SIP Fax, CDADR:TD Address Fax, T-FAY:Interpet. Fay

Result

OK: Communication OK, S-OK: Stop Communication, PW-OFF: Power Switch OFF,
TEL: RX from TEL, NG: Other Error, Cont: Continue, No Ans: No Answer,
Refuse: Receipt Refused, Busy: Busy M-Full: Memory Full: LOUR: Receiving length Over,
POVR: Receiving page Over, FIL: File Error, DC: Decode Error, MDN: MDN Response Error, PRINT: Compulsory Memory Document Print;
DSN: DSN Response Error, PRINT: Compulsory Memory Document Send.

\* 2ND PERUEST \*

One Meridian Blvd, Suite 2C01 Wyomissing, PA 19610 Phone: 610-373-7999 ext. 1143 jsonon@ugies.com





To:	Business License Clearance Division	From:	Jamie Sonon
Fax:	717-783-6055	Date:	May 4, 2018
Phone	•	Pages:	2 (including cover page)
Re:	Tax Status Request	CC:	
			**************************************

•Comments:

Please see the attached letter for a tax status request.

Thank you, Jamie Sonon

JSONON @ UGHES. COM
THAM YOU!

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

:

Petition of UGI Energy Services, LLC To Reduce Its Bonding Requirement

Docket No: A-2013-2369288

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#### **CERTFICATE OF SERVICE**

I hereby certify that I have, this 22<sup>nd</sup> day of May, served a true and correct copy of the foregoing redacted public version of this document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

## **VIA FIRST CLASS MAIL:**

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

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

Office of Small Business Advocate 300 North Second Street – Suite #202 Harrisburg, PA 17101

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

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

UGI Utilities, Inc.

Attn: Rates Dept. – Choice Coordinator 2525 N. 12<sup>th</sup> Street, Suite 360 PO Box 12677 Reading, PA 19612-2677

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

PPL Electric

Frank H. Markle

Dated: May 24, 2018