



August 8, 2018

VIA FEDERAL EXPRESS

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Champion Energy Services, LLC ("Champion")
Annual Petition for Renewal of Bond Reduction
Docket No. A-2009-2124113**

Dear Secretary Chiavetta:

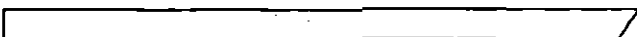
Pursuant to the Order issued on July 24, 2014 and the Secretarial Letter issued on April 8, 2016 in Docket No. M-2013-2393141, please accept this letter as Champion's Annual Petition for Renewal of its Bond Reduction. A payment of \$350 has been separately mailed from our parent company, Calpine.

In support of this request, Champion is submitting under seal the following documents:

- Champion's gross receipts for the sale of electricity to retail customers in Pennsylvania for the most recent four quarters (Attachment A);
- proof of prepaid gross receipt taxes towards Champion's estimated revenues for the current year (Attachment B); and
- proof of service of the petition on the statutory advocates and affected EDCs (Attachment C).
- AEPS compliance documentation

Upon receipt, Champion will supplement its filing with a Tax Letter of Good Standing from the Pennsylvania Department of Revenue.

These documents contain proprietary information that should not be publicly disclosed. This proprietary information contains sensitive commercial and/or financial information that could be used by Champion's competitors to determine Champion's market share in each service area, and thereby provide them insight into their relative position in the market, and Champion's marketing strategy, which would be of value to Champion's competitors, giving them an unfair advantage.





Disclosure of this proprietary information would cause substantial harm to Champion, outweighing any public interest considerations for public disclosure of this type of information, and confidential treatment would be consistent with federal law concerning protection of market share, see, e.g., *Sharkey v. FDA*, 2007 U.S. App. LEXIS 23597 (11th Cir. 2007) (holding that market share and sales volume of vaccine manufacturers is confidential commercial information), and other states' treatment of sales data, see, e.g., *Champion Energy, LLC's Petition for Relief to Protect Petitioner's 2013 Kilowatt-Hour Report from Disclosure for Not Less Than Two Years to Protect Highly Confidential and Proprietary Information* Illinois Commerce Commission Docket No. 14-0198, Order (I.C.C. Apr. 16, 2014) (finding Champion's total kilowatt-hour sales were confidential information that should not be publicly disclosed).

Therefore, Champion requests confidential treatment under 52 Pa. Code § 5.423. Accordingly, this report contains four copies (two copies with the confidential data expurged and two copies of the unexpurged report, marked confidential).

This filing also includes an extra copy of this cover letter for our records. Please date-stamp this extra copy and return it at your earliest convenience using the enclosed self-addressed, stamped envelopes. Thank you for your assistance, and please contact me if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Isabel Montalvo".

Isabel Montalvo
Regulatory Affairs Analyst



VERIFICATION

I, Michael Sullivan, President and Chief Executive Officer of Champion Energy Services, LLC, hereby state that the facts above set forth 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).

DATED:

August 8, 2018



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Michael Sullivan
President and Chief Executive Officer

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ATTACHMENT A
Gross Receipts

As shown below, Champion's gross revenues for the sale of electricity to retail customers for the most recent 12 months totaled [REDACTED], 5 percent of which is [REDACTED]. Champion is therefore requesting the Commission to authorize it to change the current letter of credit to [REDACTED]. Champion is not requesting a change to the form of security currently used to satisfy the bonding requirement.

		Retail Electric Sales Revenue	Gross Receipts Tax	Gross Receipts
Q3	Jul-17	[REDACTED]	[REDACTED]	[REDACTED]
	Aug-17			
	Sep-17			
Q4	Oct-17			
	Nov-17			
	Dec-17			
Q1	Jan-18			
	Feb-18			
	Mar-18			
Q2	Apr-18			
	May-18			
	Jun-18			
Total:				

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ATTACHMENT C
Certificate of Service

I hereby certify that I have this day served by U.S. Mail a true copy of Champion Energy Services, LLC's Request to Amend Electric Generation Supplier License Application (excluding confidential attachments) upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Tanya J. McCloskey
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Pennsylvania Office of Attorney General
16th Floor, Strawberry Square
Harrisburg, PA 17120

John R. Evans
Office of the Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

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

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

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

Legal Department
First Energy
2800 Pottsville Pike
Reading, PA 19612

Legal Department
Attn: Paul E. Russell
PPL
Two North Ninth Street
Allentown, PA 18108-1179

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

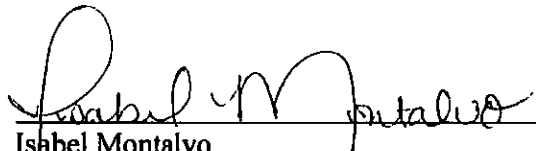
Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

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Dated this 8th day of August 2018.


Isabel Montalvo
Regulatory Affairs Analyst

ATTACHMENT D
AEPS Compliance Documentation

Champion has not finalized the most recent 12 months of AEPS compliance (due September 1, 2018) and will supplement this filing if needed once the final purchases have been completed. However, Champion is providing AEPS compliance data for the period of June 2016 through May 2017 and the email from the AEPS coordinator stating compliance for energy year 2017.

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PENNSYLVANIA ALTERNATIVE ENERGY CREDIT PROGRAM

Via Email to: Calpine Energy Services, L.P. (Champion) (bcrockett@championenergyservices.com)

15 September, 2017

Dear Pennsylvania Electric Supplier:

This letter is to inform you that Calpine Energy Services, L.P. (Champion) has met the non-solar Tier I, solar Tier I and Tier II AEC retirement requirements for energy year 2017.

If you have any questions regarding this letter please contact InClime, the Pennsylvania AEPS Administrator, at customerservice@pennaeps.com or by phone at 877-333-0573.

Best,

Pennsylvania AEPS Administration Team

Calpine Energy Services, L.P. (Champion) - My RPS Compliance - PA - Jun 2016 - May 2017

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Total Generation for Subaccount	PA Solar	PA Tier I	PA Tier II	Total Certificates Used for RPS
Calpine Energy Services, L.P. (Champion)	PA - APS	APS							
Calpine Energy Services, L.P. (Champion)	PA - DUQ	DUQ							
Calpine Energy Services, L.P. (Champion)	PA - MetEd	METED							
Calpine Energy Services, L.P. (Champion)	PA - ATSI	PAPWR							
Calpine Energy Services, L.P. (Champion)	PA - PECO	PECO							
Calpine Energy Services, L.P. (Champion)	PA - PenElec	PENELEC							
Calpine Energy Services, L.P. (Champion)	PA - PPL	PPL							
Total									

View/Print Label

1. **Print the label:** Select the print icon in your PDF Reader window to print the label below.
2. **Fold the printed label at the dotted line.** Place the label in a FedEx Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

FOLD HERE

ORIGIN ID:MIFA (281) 653-0050
ISABEL MONTALVO
CALPINE - CHAMPION ENERGY SERVICES
1500 RANKIN RD, STE 200
HOUSTON, TX 77073
UNITED STATES US

SHIP DATE: 09AUG18
ACTWGT: 1.00 LB
CAD: 100844866WSX12300

BILL THIRD PARTY

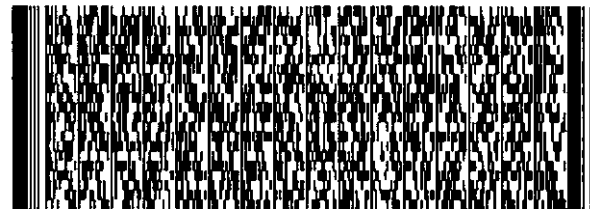
TO

**PENNSYLVANIA PUBLIC UTILITY COMMISS
KEYSTONE BUILDING, 2ND FLOOR ROOM N**

HARRISBURG PA 17120

(281) 653-0050 REF 30520-3270
INV. ARG01211163
PO DEPT

552J1G309DC45



**FRI - 10 AUG 3:00P
STANDARD OVERNIGHT**

TRK#
0201 **7822 2984 8239**

XH MDTA

**17120
PA-US MDT**

