

Sarah C. Stoner
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September 13, 2018

VIA HAND DELIVERY

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

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RE: Letter Petition of Energy Plus Holdings LLC for Continuation of 5% Reduction in Security Requirements; Docket No. A-2009-2139745

Dear Secretary Chiavetta:

Please accept this Letter Petition on behalf of Energy Plus Holdings LLC ("EPH") to renew its required level of financial security at the reduced level of 5%.

This renewal request is made consistent with the directives of the Commission's Bond Reduction Order,¹ and is being submitted at least 90 days prior to expiration date of EPH's current security. EPH has been a licensed EGS in the Commonwealth for more than two years. See Docket No. A-2009-2139745. EPH'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 Letters dated September 29, 2016 and October 11, 2017 at the above referenced docket number.

Please find the following information in support:

- 1) EPH's gross receipts in Pennsylvania for the four most-recent quarters attached hereto as Appendix A (**CONFIDENTIAL**);
- 2) EPH 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) EPH's Alternative Energy Portfolio Standards compliance data is attached hereto as Appendix C (**CONFIDENTIAL**).

¹ *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments*, Docket No. M-2013-2393141, Final Order entered July 24, 2014.

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.

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

Enclosures

cc: Stephen Jakab, Bureau of Technical Utility Services (with appendices)
Certificate of Service (without appendices)

VERIFICATION

I, Mike Starck, hereby state that I am Vice President of Energy Plus Holdings LLC 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).

9/11/2018
Dated

Mike Starck
Mike Starck

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CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Energy Plus Holdings LLC's 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

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128

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

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

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

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

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

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

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

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

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

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

Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Dated: September 13, 2018



Sarah C. Stoner, Esq.

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