



September 12, 2018

VIA FEDERAL EXPRESS

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

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

RECEIVED

SEP 12 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Secretary Chiavetta:

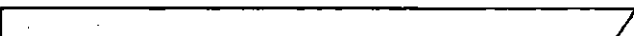
On August 9, 2018, Champion filed a petition to maintain its bonding level of 5% of its most recent 4 quarters of revenue subject to the minimum of \$250,000, per the Commission’s Order entered July 24, 2014, at Docket No. M-2013-2393141. The Commission responded with a letter dated August 24, 2018, requesting data to complete the analysis.

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

- Champion’s revised Certificate of Service list
- Champion’s Tax Status Letter of Good Standing from the Department of Revenue
- Proof of prepaid gross receipt taxes

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 submission contains four copies (two copies with the confidential data expurgated and two copies of the unexpurgated 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,

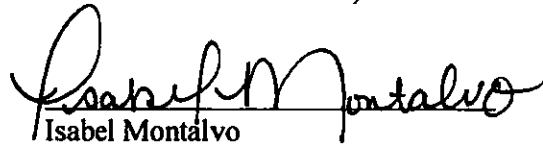
A handwritten signature in black ink that reads "Isabel Montalvo".

Isabel Montalvo
Regulatory Affairs Analyst

VERIFICATION

I, Isabel Montalvo, 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: September 12, 2018


Isabel Montalvo
Regulatory Affairs Analyst

Revised
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

Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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

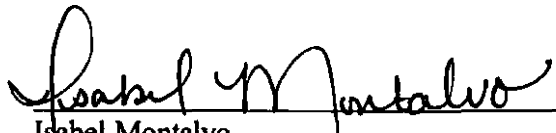
Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

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

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

PA Department of Revenue
Bureau of Compliance
P.O. Box 280946
Harrisburg, PA 17128-0946

Dated this 12th day of September 2018.


Isabel Montalvo
Regulatory Affairs Analyst

Bureau of Compliance
P O Box 280946
Harrisburg, PA 17128-0946
www.revenue.pa.gov



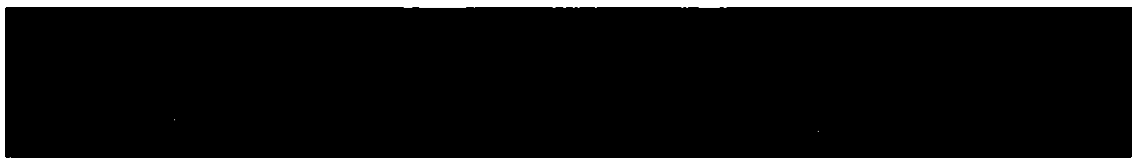
Tuesday, July 31, 2018

Attention: Michael Sullivan

RE:
Champion Energy Services, LLC
1500 Rankin Rd, Suite 200
Houston, TX 77073

Federal EIN: 20-1466960
Social Security Number:
Business Partner Number: 1000294440

Dear Requester,



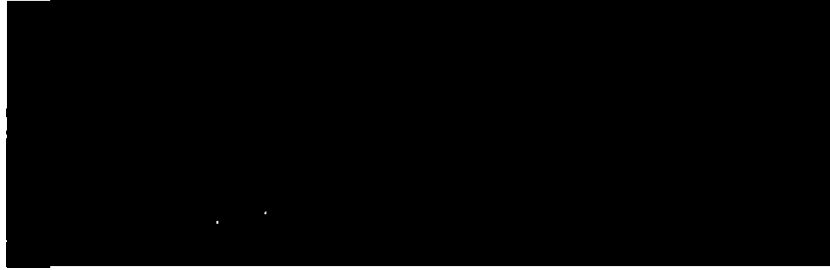
Sincerely,

A handwritten signature in black ink, appearing to be 'K. L. ...'.

PA Department of Revenue,
Bureau of Compliance,
Business License Clearance Division

Payment Info

Business Name			Revenue ID	Federal Employer Identification Number
CHAMPION ENERGY SERVICES LLC			1000294440	20-1466960
Period Start Date	Period End Date	Period Due Date	Effective Date	Time Filed
1/1/2018	12/31/2018	3/15/2019	03/15/2018	3/5/2018 9:56:00 AM



Filed By	Transaction ID	Transaction Status	Payment Status
Julia Stafford	1318000001491250	Processed	Accepted

Return