

January 25, 2019

VIA HAND DELIVERY

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

**RE: Green Mountain Energy Company's Annual Compliance Filing for Continuation of
5% Reduction in Security Requirements
Docket No. A-2011-2229050; Utility Code: 1113241**

Dear Secretary Chiavetta:

Please accept this Annual Compliance Filing on behalf of Green Mountain Energy Company ("Green Mountain") to renew its required level of financial security at the reduced level of 5%.

Green Mountain's contact person for this Annual Compliance Filing is as follows:

Leah Gibbons
Director, Regulatory Affairs
3711 Market Street, Suite 1000
Philadelphia, PA 19104
Tel.: 301.509.1508
Email: lgibbons@nrg.com

This renewal request is made consistent with the directives of the Commission's September 20, 2018 Tentative Opinion and Order and the Secretarial Letter issued November 1, 2018,¹ and is being submitted at least 90 days prior to the expiration date of Green Mountain's current security (April 26, 2019). Green Mountain's reduction in financial security to 5% was approved by the Commission through the Secretarial Letter dated March 19, 2018, at the above referenced docket

¹ *Petition of the Retail Energy Supply Association to Simplify the Financial Security 5% Renewal Process*; Docket No. P-2017-2608078, dated November 1, 2018; *Petition of the Retail Energy Supply Association to Simplify the Financial Security 5% Renewal Process*; Docket No. P-2017-2608078, Tentative Opinion and Order entered September 20, 2018.

Sarah C. Stoner
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number. Green Mountain is compliant with Alternative Energy Portfolio Standard requirements and the Commission's annual and supplemental fee requirements.

The following attachments support this Annual Compliance Filing:

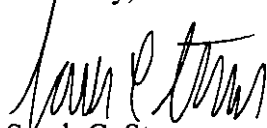
- 1) Green Mountain's gross receipts in Pennsylvania for the four most-recent quarters and its 5% gross receipt calculation is attached hereto as Appendix A (**CONFIDENTIAL**);
- 2) Green Mountain is current with its tax liabilities to the Commonwealth of Pennsylvania and is providing Form REV-423 Specialty Tax Estimated Payment Form and a Tax Status Letter from the Pennsylvania Department of Revenue, which are both attached hereto as Appendix B (**CONFIDENTIAL**); and
- 3) Green Mountain's original bond increase rider in an amount equal to 5% of its most recent 12-months of gross receipts and its continuation certificate (**CONFIDENTIAL**).

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 Annual Compliance Filing. The statutory advocates, the Commission's Bureau of Investigation & Enforcement, the Office of Attorney General, the Pennsylvania Department of Revenue and the pertinent electric distribution companies have been served with a copy of this Annual Compliance Filing 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 (under seal)


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

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VERIFICATION

I, Mark Parsons, hereby state that I am Vice President of Green Mountain Energy Company and am authorized to make this verification on its behalf. The facts set forth in the foregoing Annual Compliance Filing 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).

1-16-19
Dated _____



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CERTIFICATE OF SERVICE

I hereby certify that this day I served a non-confidential copy of Green Mountain Energy's Annual Compliance Filing For Continuation of 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, 2 West
Harrisburg, PA 17120

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

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

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

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

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

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

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

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

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


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

Office of General Counsel
Attn: Kimberly Klock
PPL
Two North Ninth Street
Allentown, PA 18108-1179

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

Pike County Light & Power Company
Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Dated: January 25, 2019



Sarah C. Stoner, Esq.