



March 27, 2019

VIA E-MAIL AND FEDEX

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

RECEIVED
MAR 28 2019
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: **Transfer Residential Customers from Champion Energy Services, LLC
to North American Power and Gas, LLC**
License No. A-2009-2124113 and A-2010-2176743

Dear Secretary Chiavetta:

As requested by the Commission on February 28, 2019, Champion Energy Services, LLC ("Champion"), respectfully submits data needed to complete the Commission's analysis of the transfer of residential customers from Champion to its affiliate, North American Power and Gas, LLC ("NAPG").

This filing contains highly confidential, proprietary, and commercially sensitive information that Champion has designated as Confidential and requests that it is treated accordingly. In accordance with Commission procedures, Champion provides the following reasons for why the information is subject to protection from public disclosure. Specifically, the information constitutes trade secrets, proprietary, and/or commercial and financial information that is privileged or confidential and is exempt from public disclosure under one or more of the exceptions contained in the Pennsylvania Right-to-Know Law. More particularly, this information includes, but is not limited to, market-sensitive material which is company specific, and/or information of highly commercially sensitive nature involving company business operations or financial information. The information in this filing is not widely available or known outside of Champion, is information that Champion has spent considerable time and effort in acquiring and/or analyzing, and such information or analysis would be of considerable value to competitors, or potential competitors of Champion and if made widely available could lead to the serious detriment of Champion.

In accordance with the instructions for submission of confidential information, Champion is submitting two copies of the filing marked Confidential, and two public copies of the filing with the confidential information expurgated.

One extra copy of this letter also is attached. Please date stamp this copy and return it to me in the attached self-addressed stamped envelope.



If you have any questions concerning this filing or Champion's request for confidential treatment, please contact me by telephone at 281.653.0050 or by e-mail at isabel.montalvo@champion.energy. Thank you for your attention to this matter.

Respectfully submitted,

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

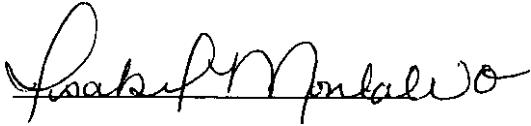
Isabel Montalvo
Regulatory Affairs Analyst

Enclosures

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).

Date: 3/27/2019

A handwritten signature in cursive script, appearing to read "Isabel Montalvo", written over a horizontal line.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket Nos. A-2009-2124113 & A-2010-2176743
Champion Energy Services, LLC & North American Power and Gas, LLC
Data Request Responses

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SECRETARY'S BUREAU

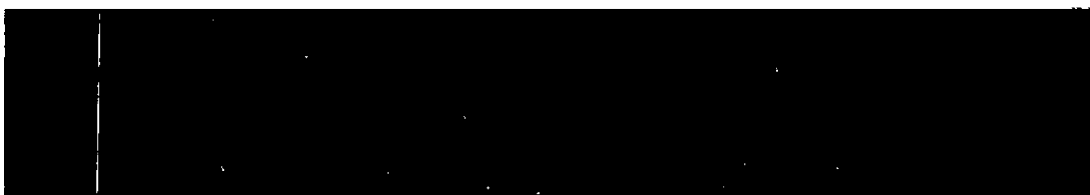
1. **Regarding Customers** – Please explain if Champion Energy Services, LLC will have any customers remaining after its transfer to North American Power and Gas, LLC.

The transfer of customers from Champion to NAPG only applies to residential customers. Champion still has non-residential customers in Pennsylvania that it will continue to serve.

2. **Regarding Customer Contracts** – Please provide an attestation that the customer contracts being assigned allow for assignment.

Champion confirms that the transfer of all residential customers from Champion to NAPG is in accordance with the customers' terms and conditions.

3. **Regarding Gross Revenues** – Please provide the most recent 4 quarters of Champion Energy Services, LLC's gross revenues for the sale of electricity to its Pennsylvania customers being assigned to North American Power and Gas, LLC only. The gross revenues submitted with the filing match Champion Energy Services, LLC's total quarterly gross revenues previously submitted to the commission.



4. **Regarding Gross Revenues** – Please explain why the most recent 4 quarters of North American Power and Gas, LLC's gross revenues for the sale of electricity to its Pennsylvania customers do not match the quarterly gross revenues previously submitted to the Commission.

Quarterly gross revenue reports submitted to the Commission prior to Q4 2018 were completed by individuals no longer with NAPG and supporting documentation for information on these filings were not retained. The information provided in Exhibit 2 of the letter filed on January 29, 2019, by Champion and NAPG, reflects the correct totals. Following this filing, on or before April 30, 2019, NAPG will provide the same totals on its Electric Choice Annual Report.

5. **Regarding Gross Revenues** – Champion Energy Services, LLC and North American Power and Gas, LLC have not filed all required Electric Choice Quarterly Reports with the PUC. Please provide the missing reports for the fourth quarter of 2018 in response to this data request.

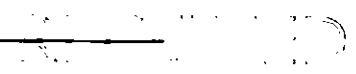
Electric Choice Quarterly Reports attached.

6. **Regarding Certificate of Service** – Please provide a Certificate of Service as proof of service of Champion Energy Services, LLC's filing on as Citizens' Electric, Duquesne Light Company, Pike County Light and Power, UGI Utilities, and Wellsboro Electric.

Updated Certificate of Service attached.

ELECTRIC CHOICE QUARTERLY REPORT

Pennsylvania Gross Receipts¹



Name of Company: Champion Energy Services, LLC
Company Address: 1500 Rankin Road, Suite 200, Houston, TX 77073
Name and Title of Contact Person: Isabel Montalvo, Regulatory Affairs Analyst
Phone Number of Contact Person: 281-653-0050
Company Email Contact: isabel.montalvo@champion.energy

MAR 28 2019
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Period of Operation:
From October/2018 (Month, Year) to December/2018 (Month, Year)

Complete one Quarterly Gross Receipts Report for each License/Certificate issued by the Commission. This form may be photocopied for reporting purposes. Please mark with a "✓" the category that applies:

- Takes title to the electricity (Supplier, Generator, Aggregator, Municipal Supplier, or Electric Cooperative Supplier of electric power)
 - Municipal Suppliers and Electric Cooperatives should only report on retail activity that has occurred outside of their municipal boundaries or certified territory.
- Does not take title to the electricity (Broker/Marketer)
 - If collecting charges from PA licensed or certificated electricity providers for interstate electric energy sales, check the "Sales for Resale" box below and report total sales (kWh). No Gross Receipts are reported for these types of sales.



***Note: If you are a broker/marketer who does not take title to any electricity you should report \$0 as your total gross receipts for the quarter.**

¹ Gross receipt information is proprietary and will not be released to the public. Commission Order entered 7/20/00 at P-00991752. Confidential treatment of other information may also be requested. See Notice to Electricity Providers.

ELECTRIC CHOICE QUARTERLY REPORT

Disaggregated Pennsylvania Retail Sales (kWh) by EDC Service Area

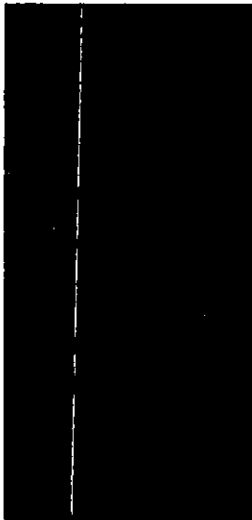
Name of Company:

Champion Energy Services, LLC

Period of Operation:

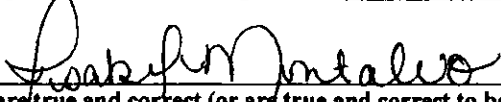
From October/2018 (Month, Year) to December/2018 (Month, Year)

Complete one Quarterly Report of Retail Sales (kWh) for each License/Certificate issued by the Commission. Please mark with an "X" each Electric Distribution Company (EDC) applicable to your company's retail sales within the Commonwealth of Pennsylvania. Indicate the total kWh sold for distribution within each service area.



- Citizens Electric Co.
- Duncannon, Borough of
- Duquesne Light Co.
- Metropolitan-Edison Co. (Met-Ed)
- PPL Electric Utilities Corp.
- PECO Energy Co.
- Pennsylvania Electric Co. (Penelec)
- Pennsylvania Power Co.
- Pike County Light & Power Co.
- St. Clair, Borough of
- Schuylkill Haven, Borough of
- Smethport, Borough of
- UGI Utilities Inc.
- Wellsboro Electric Co.
- West Penn Power Co.

Please print name here and sign below: Isabel Montalvo

I  hereby state that the facts above set forth are true and correct (or are true and correct to 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. sec. 4904 (relating to unsworn falsification to authorities).

PUBLIC VERSION

ELECTRIC CHOICE QUARTERLY REPORT

Pennsylvania Gross Receipts¹

Name of Company: North American Power and Gas, LLC

Company Address: 1500 Rankin Road, Houston, Texas 77073

Name and Title of Contact Person: Isabel Montalvo, Regulatory Affairs Analyst

Phone Number of Contact Person: 281-653-0050

Company Email Contact: isabel.montalvo@champion.energy

Period of Operation:

From October / 2018 (Month, Year) to December / 2018 (Month, Year)

Complete one Quarterly Gross Receipts Report for each License/Certificate issued by the Commission. This form may be photocopied for reporting purposes. Please mark with a "✓" the category that applies:

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PUBLIC VERSION

ELECTRIC CHOICE QUARTERLY REPORT

Disaggregated Pennsylvania Retail Sales (kWh) by EDC Service Area

Name of Company: North American Power and Gas, LLC

Period of Operation:

From October / 2018 (Month, Year) to December / 2018 (Month, Year)

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- Duncannon, Borough of
- Duquesne Light Co.
- Metropolitan-Edison Co. (Met-Ed)
- PPL Electric Utilities Corp.
- PECO Energy Co.
- Pennsylvania Electric Co. (Penelec)
- Pennsylvania Power Co.
- Pike County Light & Power Co.
- St. Clair, Borough of
- Schuylkill Haven, Borough of
- Smethport, Borough of
- UGI Utilities Inc.
- Wellsboro Electric Co.
- West Penn Power Co.

Please print name here and sign below: Isabel Montalvo

Isabel Montalvo

_____ hereby state that the facts above set forth are true and correct (or are true and correct to 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. sec. 4904 (relating to unsworn falsification to authorities).

CERTIFICATE OF SERVICE

On this the 27th day of March 2019, I certify that a true and correct copy of the foregoing filing and all non-confidential attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

Via First Class Mail

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

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

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

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

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

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

Duquesne Light Company
Regulatory Affairs
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

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

PPL
Office of General Counsel
Attn: Kimberly A. Klock
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179


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

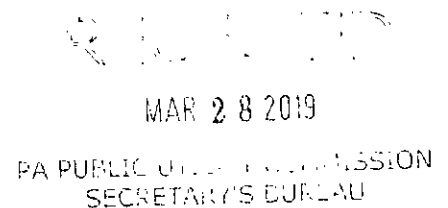
Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612




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

Dated: 3/27/19


Isabel Montalvo, Regulatory Affairs Analyst



1. Print the label. Select the print icon in your PDF Reader window to print the label.
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.
3. Getting your shipment to FedEx
 - Customers without a Daily Pickup
 - Take this package to any FedEx Store location and drop it off with your label attached.
 - Air shipments can be picked up or dropped off. To schedule a pickup, or to find a drop-off location, select the Pickup or Drop-off icon from the FedEx tool bar.
 - Customers with a Daily Pickup
 - Your driver will pickup your shipment(s) as usual.

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: 28MAR19 ACTWGT: 1.00 LB CAD: 100844868/AWSX12300 BILL THIRD PARTY
TO	
PA PUC 400 N ST COMMONWEALTH KEYSTONE HARRISBURG PA 17120	
(866) 582-7447 INV ARG01324316 PO	REF 30520-3270 DEPT
	
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