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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PUBLIC VERSION



July 19, 2019

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 – Annual Compliance Filing for 5% Financial Security Reduction Licensing Docket No. A-2009-2124113 / Utility Code: 1111296

Dear Secretary Chiavetta:

Pursuant to the Order issued on September 20, 2018 in Docket No. P-2017-2608078, please accept this letter as Champion Energy Services, LLC's ("Champion") intent to renew the 5% Financial Security Reduction previously granted. Champion's current financial security's anniversary date is 10/19/19.

In support of this filing, 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 and the 5% gross receipts calculation (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 filing on the statutory advocates and affected EDCs (Attachment C).

The original rider in the amount equal to 5% of Champion's most recent 12-months of gross receipts will be delivered separately by Champion's parent Company, Calpine Corporation.

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 filing contains four copies (two copies with the confidential data expurged and two copies of the unexpurged filing, 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. If you have any questions, please contact me by phone at 281-653-0050 or by email at isabel.montalvo@champion.energy.

Respectfully submitted,

A handwritten signature in cursive script that reads "Isabel Montalvo".

Isabel Montalvo
Regulatory Affairs Analyst

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 changing the current letter of credit to \$ [REDACTED]. Champion is not changing the form of security currently used to satisfy the bonding requirement.

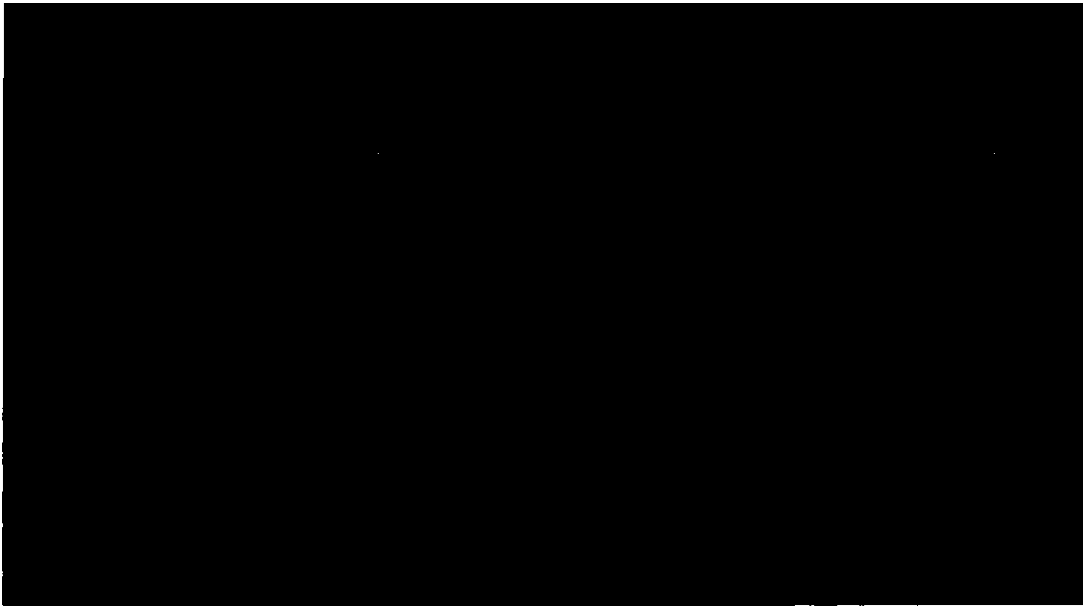
		Gross Receipts
Q3	Jul-18	[REDACTED]
	Aug-18	
	Sep-18	
Q4	Oct-18	
	Nov-18	
	Dec-18	
Q1	Jan-19	
	Feb-19	
	Mar-19	
Q2	Apr-19	
	May-19	
	Jun-19	
Total:		

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ATTACHMENT B
Proof of Prepaid Gross Receipt Taxes

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Payment Info



Return

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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 Annual Compliance Filing for 5% Financial Security Reduction (excluding confidential attachments) upon the parties listed below.

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 Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17120

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

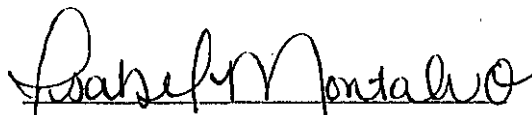
UGI Utilities, Inc.
Attn: Rates Dept. - Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, PA 19612-2677

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

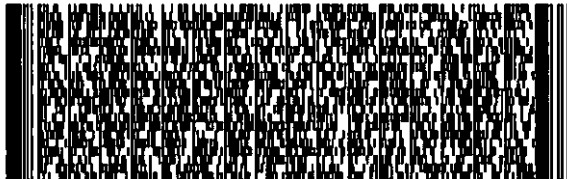

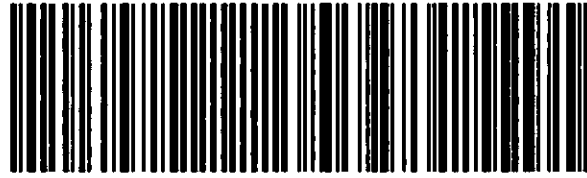
Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Dated: 7/19/19


Isabel Montalvo, Regulatory Affairs Analyst

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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) 853-0050 ISABEL MONTALVO CALPINE - CHAMPION ENERGY SERVICES 1500 RANKIN RD, STE 200 HOUSTON, TX 77073 UNITED STATES US	SHIP DATE: 19 JUL 19 ACTWGT: 1.00 LB CAD: 100844886/WSX12300 BILL THIRD PARTY
TO	
PENNSYLVANIA PUBLIC UTILITY COMMISS KEYSTONE BUILDING, 2ND FLOOR ROOM N201 HARRISBURG PA 17120	
(800) 892-7380 INV. ARG01333525 PO.	REF: 30520-3270 DEPT.
	
	
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