

Eckert Seamans Cherin & Mellott, LLC 213 Market Street 8th Floor Harrisburg, PA 17101
 TEL
 717 237 6000

 FAX
 717 237 6019

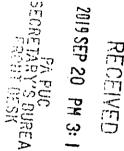
 www.eckertseamans.com

Sarah C. Stoner 717.237.6026 sstoner@cckertseamans.com

September 20, 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: Annual Compliance Filing of Direct Energy Services, LLC for Continuation of 5% Reduction in Security Requirements; Docket No. A-110164

Dear Secretary Chiavetta:

Direct Energy Services, LLC ("Direct Energy") received authority to reduce its security with the Pennsylvania Public Utility Commission from 10% to 5% of Direct Energy's most recent twelve months of revenue, pursuant to the Secretarial Letter dated July 15, 2019. Direct Energy's current financial security reduction is effective until December 23, 2019. Direct Energy files this Annual Compliance Filing to renew its security at the reduced level of 5% based on its most recent twelve months of revenue.

Direct Energy provides the following information and documentation in support of its Annual Compliance Filing:

1) A spreadsheet of Direct Energy's gross receipts in Pennsylvania for the most-recent 12 months (August 2018 through July 2019) attached hereto as Appendix A (CONFIDENTIAL);

2) A copy of Direct Energy's confirmation from the Pennsylvania Department of Revenue that it has prepaid gross receipts, attached as Appendix B (CONFIDENTIAL);

3) A letter from the AEPS Administrator confirming Direct Energy's compliance with AEPS requirements attached hereto as Appendix C (CONFIDENTIAL); and

4) A Tax Status Letter from the Pennsylvania Department of Revenue to evidence that it is current with its tax liabilities to the Commonwealth, attached as Appendix D (CONFIDENTIAL).

Secretary Chiavetta September 20, 2019 Page 2

Once we receive confirmation from Commission staff regarding the calculation of Direct Energy's reduced security amount, we will submit an original amendment to Direct Energy's letter of credit.

The Direct Energy contact person for this Annual Compliance Filing is as follows:

Andy Beauchamp Regulatory Licensing and Reporting 12 Greenway Plaza, Suite 250 Houston, TX 77046 Tel. 713.877.3925 Email: <u>Andy.Beauchamp@directenergy.com</u>

Enclosed please find a verification attesting to the truthfulness of facts set forth in Direct Energy's request. Copies of this Annual Compliance Filing to be served in accordance with the attached Certificate of Service.

Please be advised that the confidential attachments to this filing are being provided to the Commission under seal and it is requested that they be maintained in a non-public folder.

Should you have any questions or concerns regarding this Annual Compliance Filing, please feel free to contact me.

Sincerely,

Enclosures

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

VERIFICATION

I, Andy Beauchamp, state that I am a Regulatory Licensing and Reporting Analyst for Direct Energy. I hereby verify that I am authorized to and do make this Verification for Direct Energy Services, LLC, and that 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 any 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).

Andy Beauchamp \bigcirc Regulatory Licensing & Reporting Analyst Direct Energy

PA PUC SECRETARY'S BUREAU SEO THOAP

2019 SEP 20 PM 3: 13

RECEIVED

{L0832032.1}

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Direct Energy Services, LLC's Annual

Compliance Filing 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

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

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

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

Legal Department Attn: Kimberly A. 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: September 20, 2019

Sarah C. Stoner, Esq.