



EDF ENERGY SERVICES

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A-2014-2438483

APRIL 22, 2020

VIA EMAIL

Secretary
Pennsylvania PUC
Commonwealth Keystone Building – 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: EDF Energy Services, LLC’s Electric Choice Quarterly Report Pursuant to Section 54.39(a) of the Pennsylvania Code

Dear Secretary:

EDF Energy Services, LLC (“EDF”) is an Electric Generation Supplier in Pennsylvania. Pursuant to the rules of the Pennsylvania Public Utility Commission (“Commission”), 52 Pa. Code 54.39, EDF provides its First Quarter 2020 Electric Choice Quarterly Report (“Quarterly Report”).

The Quarterly Report contains financially sensitive and proprietary information. EDF requests confidential treatment of the Quarterly Report as disclosure of the contents could subject EDF to substantial competitive harm. See 66 Pa. Cons. Stat. 335(d); 52 Pa. Code 5.365. Accordingly, EDF is submitting two versions of the Quarterly Report in accordance with the instructions set forth in the Notice to Licensed Electricity Providers that accompanies the Electric Choice Quarterly Report Form. Specifically, these are:

- (i) A non-public confidential version (Attachment A); and
- (ii) A redacted version that keeps confidential the total kWh sold and gross receipts received (Attachment B).

In the event, that disclosure of the Quarterly Report is required, EDF requests that the Commission disclose only the redacted version pursuant to 52 Pa. Code 54.39(d).

Please contact the undersigned if you have any questions.

Respectfully submitted,

J. Lance Hitt, Regulatory Affairs

EDF Energy Services, LLC

EDF Trading North America, LLC

EDF Industrial Power Services (CA), LLC

O (281) 653-1039 M (901) 569-6469

Attachment B

ELECTRIC CHOICE QUARTERLY REPORT

Pennsylvania Gross Receipts¹

Name of Company: EDF Energy Services, LLC
 Company Address: 601 Travis St, Suite 1700, Houston, TX 77002
 Name and Title of Contact Person: J. Lance Hitt Analyst, Regulatory Reporting
 Phone Number of Contact Person: 281-653-1039
 Company Email Contact: lance.hitt@edfenergyna.com
 Period of Operation:
 From January 2020 (Month, Year) to March 2020 (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.

<p>CALENDAR YEAR:</p> <p style="text-align: center;"><u>2020</u></p>	<p>CHECK APPROPRIATE BOX:</p> <p style="text-align: center;">X Retail Sales Report Sales for Resale</p> <div style="background-color: black; width: 100px; height: 15px; margin: 5px auto;"></div>
<p>GROSS RECEIPTS (if applicable)*: [REDACTED]</p> <p>\$</p>	

***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: _____ EDF Energy Services, LLC _____

Period of Operation:

From January 2020 (Month, Year) to March 2020 (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: _____

I Deborah Merrill 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).

NOTICE TO LICENSED ELECTRICITY PROVIDERS**Availability of Confidential Treatment for Information
Provided in Quarterly and Annual Reports**

Note that pursuant to 52 PA Code § 54.39(d) these annual and quarterly reports “will be made available for public review upon request to the Commission subject to any rulings on confidentiality made by the Commission.” However, the Commission has issued a general ruling that the total amount of gross receipts that licensed EGSs are required to report pursuant to 52 Pa. Code § 54.39(b)(2) is considered proprietary and shall not be released to the public. See Petitions of Exelon Energy; Reliant Energy Retail, Inc.; and Statoil Energy Services, Inc for Protective Order, Order entered July 20, 2000 at Docket Nos. P-00991752; P-00991753; P-00991755, p. 5. Updates to tax information requested in the application form; the total amount of electricity sold (kWh); and, the percentage of total electricity supplied by each energy source remain available for public review. Confidential treatment of this information may be requested in accordance with established Commission procedures. See also 52 Pa. Code § 5.423.

To request confidential treatment of submitted information, a company must:

- (a) indicate clearly in its transmittal letter that the filing contains proprietary information;
- (b) explain briefly why the information should be treated as confidential; and,
- (c) supply two versions of the filing: one version of the report with confidential data redacted and one version of the proprietary report. The proprietary version must be clearly marked “Confidential.” The Secretary’s Bureau and the Bureau of Fixed Utility Services will maintain copies of each type of filing accordingly.

Pending Commission review of a request for confidential treatment and upon its approval, information designated as proprietary will not be made available for public review. However, if any member of the public, the Office of Consumer Advocate or the Office of Small Business Advocate requests to examine the propriety information, or if the Commission’s Office of Special Assistants or Bureau of Investigation & Enforcement believes that proprietary claim is frivolous or otherwise not justified, the Secretary’s Bureau will issue a Secretarial Letter directing the company to file within 14 days a petition for protective order pursuant to 52 Pa. Code § 5.423. During the 14-day period, the Commission will continue to honor the proprietary claim. Absent the timely filing of such a petition, the proprietary information claim will be deemed to have been waived.

While the Commission is considering whether to grant a petition for protective order, the company’s proprietary information claim will be honored unless a proceeding has been initiated to challenge the filing. In that event, the provisions of 52 Pa. Code § 5.423(b)(4) would apply. This provision requires the company to disclose the proprietary information to a party involved in the proceeding if the party “agrees to treat the information as if it were covered by a protective order until the presiding officer or the Commission issues the order or determines that issuance of the order would not be appropriate.”