

# Stevens & Lee

17 N. Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
(717) 234-1090  
www.stevenslee.com

Direct Dial: (717) 255-7365  
Email: michael.gruin@stevenslee.com  
Direct Fax: (610) 988-0852

July 29, 2022

DATE OF DEPOSIT

**VIA FEDERAL EXPRESS**

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

JUL 29 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: WGL Energy Services, Inc. Annual Compliance Filing to Renew its Reduction in Security Amount and Continued Use of a Parental Guarantee  
Docket No. A-110158**

Dear Secretary Chiavetta:

Enclosed for filing please find an original plus one copy of WGL Energy Services, Inc.'s Annual Compliance Filing to Renew its Reduction in Security Amount and Continued Use of a Parental Guarantee to Satisfy its Security Requirement. **Please note that Exhibits 1, 2, 3 and 4 to this filing and the updated Parental Guarantee contain Confidential information, and have been marked as such and provided in a separate envelope.** The Petitioner requests that the Exhibits be filed under Seal.

Non-confidential copies of this filing have been served in accordance with the attached Certificate of Service. Upon filing, please return a time-stamped copy of the filing to me in the enclosed self-addressed stamped envelope, and if you have questions, please do not hesitate to contact me.

Best Regards,

STEVENS & LEE

  
-Michael A. Gruin

Enc.  
cc: Certificate of Service

Allentown • Bergen County • Bala Cynwyd • Cleveland • Fort Lauderdale • Harrisburg • Lancaster • New York  
Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington  
A PROFESSIONAL CORPORATION

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WGL Energy Services, Inc. : Docket No. A-110158  
Continued Reduction in Security :  
Amount and Continued Use of :  
Parental Guarantee to Satisfy its :  
Security Requirement :

**WGL Energy Services, Inc.  
Annual Compliance Filing To Renew its Reduction in Security Amount and  
Continued Use of Parental Guarantee**

And Now, pursuant to 66 Pa.C.S.A. § 2809 (c)(1)(i) and the Order of the Pennsylvania Public Utility Commission (“Commission”) published in the Pennsylvania Bulletin on October 6, 2018 in Docket No. P-2017-2608078, WGL Energy Services, Inc. (“WGL Energy”) hereby makes its annual compliance filing in order to continue the reduction of its Electric Generation Supplier security requirement to 5% of annual gross receipts, and to permit the continued use of a Parental Guarantee to satisfy its Electric Generation Supplier security requirement. In support of this filing, WGL Energy states as follows:

1. WGL Energy has been licensed as an Electric Generation Supplier (“EGS”) in Pennsylvania since 2002.
2. WGL Energy’s license number is A-110158 and its utility code is 110158.
3. WGL Energy’s contact information is set forth below:

WGL Energy Services, Inc.  
Attn: Phillip Woodyard  
Chief Operating Officer  
8614 Westwood Center Dr. #1200  
Vienna, VA 22182  
703-287-9528  
Phillip.Woodyard@wglenergy.com

4. On December 8, 2015, WGL Energy filed a request to the Pennsylvania Public Utility Commission (“Commission”) to change the form of its Electric Generation Supplier security from a bond to a parental guarantee.

5. By Secretarial Letter issued on January 11, 2016, the Commission approved WGL Energy’s request to utilize a parental guarantee instead of a bond to satisfy its Electric Generation Supplier security requirements, and required WGL Energy to annually renew its request to utilize a parental guarantee.

6. On October 5, 2017, WGL Energy submitted its first annual renewal request to continue utilizing a parental guarantee.

7. By Secretarial Letter issued on November 6, 2017, the Commission approved WGL Energy’s request to reduce its security amount from 10% to 5% of annual revenue, in accordance with the Commission’s Order entered on July 24, 2014 in Docket No. M-2013-2393141.

8. On October 16, 2018, WGL submitted its annual renewal request for the renewal of the 5% security amount and for the continued use of a parental guarantee to satisfy its security requirement for the forthcoming year.

9. By Secretarial Letter issued on November 19, 2018, the Commission approved WGL Energy’s renewal request.

10. On July 31, 2019, WGL submitted its annual renewal request for the renewal of the 5% security amount and for the continued use of a parental guarantee to satisfy its security requirement for the forthcoming year.

11. On July 31, 2020, WGL submitted its annual renewal request for the renewal of

the 5% security amount and for the continued use of a parental guarantee to satisfy its security requirement for the forthcoming year.

12. On August 3, 2021, WGL submitted its annual renewal request for the renewal of the 5% security amount and for the continued use of a parental guarantee to satisfy its security requirement for the forthcoming year.

13. The expiration/anniversary date of WGL Energy's current Financial Security is November 6, 2022.

14. With this filing, WGL Energy hereby requests the further renewal of the reduced security amount and the continued use of a parental guarantee to satisfy its security requirement for the forthcoming year.

15. WGL Energy intends to continue to provide a guarantee from its ultimate corporate parent, AltaGas Ltd., to satisfy the security obligations of WGL Energy, which will be updated to reflect the appropriate guarantee amount based on the WGL Energy's most recent 12 months of revenues.

16. Since becoming licensed in Pennsylvania, WGL Energy has always met all of its financial and annual reporting obligations.

17. WGL Energy has no outstanding Pennsylvania Tax liabilities, and since becoming licensed WGL Energy has paid its Gross Receipts Tax obligations in full and in a timely manner.

18. WGL Energy also has no outstanding financial obligations to any of its customers, to any of the Electric Distribution Companies ("EDCs") in Pennsylvania or to PJM Interconnection, LLC ("PJM").

19. Attached hereto as **Confidential Exhibit 1** is a statement showing WGL Energy's gross revenues for sales of electricity to retail customers in Pennsylvania for the most

months of July 2021 through June of 2022, and calculation of 5% gross receipts amount for its financial security.

20. Attached hereto as **Confidential Exhibit 2** is WGL Energy's most recent Department of Revenue Rev-423 PA Corporation Specialty Tax Estimated Payment form.

21. Attached hereto as **Confidential Exhibit 3** is a copy of WGL Energy's quarterly report of Gross Receipts for the second quarter of 2022.

22. Attached hereto as **Confidential Exhibit 4** is WGL a Tax Status Letter of Good Standing from the Pennsylvania Department of Revenue to confirm that WGL Energy is current with all of its Pennsylvania tax obligations.

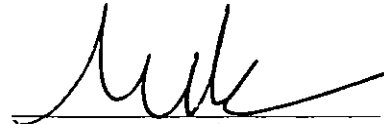
23. Enclosed herewith is an updated Parental Guarantee from AltaGas, Ltd., reflecting a guarantee amount that is equal to WGL Energy's updated 5% of gross receipts. The Parental Guarantee has been marked as Confidential for filing under seal.

24. The parental guarantee of AltaGas Ltd. fully complies with the July 24, 2014 Final Order in the Commission's Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers - Acceptable Security Instruments proceeding at Docket No. M-2013-2393141. Furthermore, the Guarantee and accompanying Chief Financial Officer Letter are provided in the form approved by the Commission's Law Bureau.

25. Copies of this filing are being served on the Bureau of Technical Utility Services, the Office of Consumer Advocate, Office of Small Business Advocate, Bureau of Investigation and Enforcement, PA Department of Revenue, Office of Attorney General Bureau of Consumer Protection and all of the EDCs in Pennsylvania in whose territories WGL Energy is licensed to operate.

Respectfully Submitted

Dated: July 29, 2022



Michael A. Gruin  
PA I.D. 78625  
STEVENS & LEE, P.C.  
17 N. 2nd St., 16th Floor  
Harrisburg, PA 17101  
(717) 255-7365  
mag@stevenslee.com  
Counsel for WGL Energy Services, Inc.

DATE OF DEPOSIT

JUL 29 2022


PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WGL Energy Services, Inc.	:	Docket No. A-110158
Continued Reduction in Security	:	
Amount and Continued Use of	:	
Parental Guarantee to Satisfy its	:	
Security Requirement	:	

**VERIFICATION**

I, Phillip G. Woodyard, holding the title of Chief Operating Office verify that the statements made in the foregoing filing are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

  
\_\_\_\_\_

Name: Phillip G. Woodyard

7/21/2022  
Date:

DATE OF DEPOSIT

JUL 29 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WGL Energy Services, Inc. : Docket No. A-110158  
Continued Reduction in Security :  
Amount and Continued Use of :  
Parental Guarantee to Satisfy its :  
Security Requirement :

I hereby certify that on this 29th day of July 2022 copies of the foregoing filing have been served upon the persons listed below via First Class U.S. Mail in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1921

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

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

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
P.O. Box 280946  
Harrisburg, PA 17128-0946

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

Legal Department  
Attn: Kimberly A. Klock  
PPL  
Two North Ninth Street  
Allentown, PA 18108-1179

Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

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

Legal Department  
First Energy  
2800 Pottsville Pike  
Reading PA, 19612

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

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

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

Citizens' Electric Company

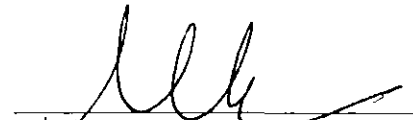
Pike County Light & Power Company



Attn: EGS Coordination  
1775 Industrial Boulevard  
Lewisburg, PA 17837

c/o Corning Natural Gas Holding Corporation  
Attn: Vice President- Energy Supply  
330 West William Street  
Corning, NY 14830

DATE: July 29, 2022



Michael A. Gruin, Esq.

DATE OF DEPOSIT

JUL 29 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Align top of FedEx Express® shipping label

ORIGIN ID:MDTA (717) 234-1090  
MICHAEL A. GRUIN, ESQUIRE

SHIP DATE: 29JUL22  
ACTWGT: 0.50 LB  
CAD: 256122886/NET4490

17 N 2ND STREET  
16TH FL  
HARRISBURG, PA 17101  
UNITED STATES US

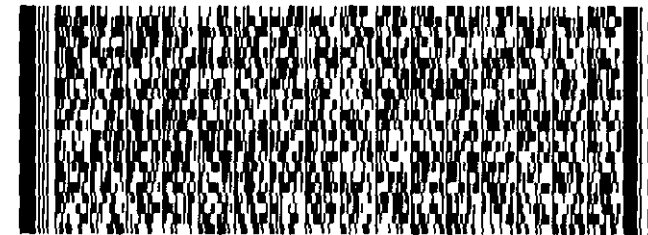
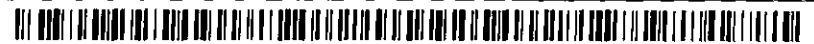
BILL SENDER

TO SECRETARY ROSEMARY CHIAVETTA  
PA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET  
HARRISBURG PA 17120

(800) 692-7380  
INV  
PO

REF 106431 00003  
DEPT

581.CJ.0A02/FE4A

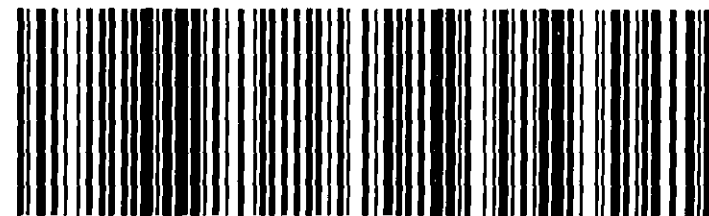


MON - 01 AUG 10:30A  
PRIORITY OVERNIGHT

TRK# 7775 2499 6116  
0201

16 MDTA

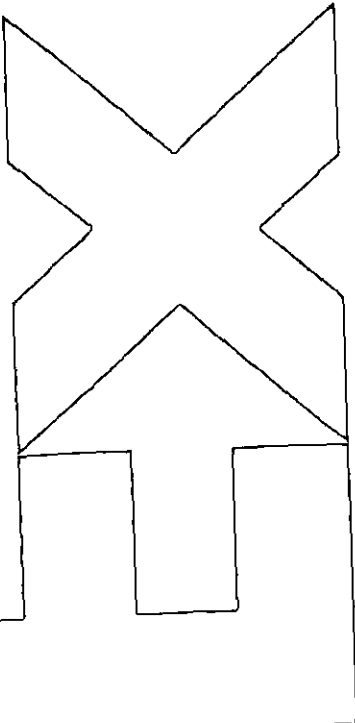
17120  
PA-US MDT



RECEIVED

AUG 1 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



To: CHIAVETA, R. PUC

Agency: PUC

Floor:

External Carrier: FEDEX

CMPC  
717-705-1952

8/1/2022 9:14:02 AM



777524996116