

Sarah C. Stoner  
717.237.6026  
sstoner@eckertseamans.com

October 5, 2022

DATE OF DEPOSIT

**Via FedEx**

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

OCT 5 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

Dear Secretary Chiavetta:

On behalf of Direct Energy Services, LLC ("Direct Energy"), enclosed for filing please find Direct Energy's Annual Compliance Filing to renew its security at the reduced level of 5% based on its most recent twelve months of revenue. Direct Energy previously 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. This Annual Compliance Filing is being submitted at least 90 days prior to the anniversary date of Direct Energy's current financial security.

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 2021 through July 2022) 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)**;
- 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)**; and

5) Direct Energy is compliant with the Commission's annual and supplemental fee requirements.

Once Direct Energy receives confirmation from Commission staff regarding the calculation of Direct Energy's reduced security amount, Direct Energy will submit an original bond continuation certificate.

The Direct Energy contact persons for this Annual Compliance Filing are as follows:

Leah Gibbons  
Senior Director – Regulatory Affairs  
3711 Market Street, Suite 1000  
Philadelphia, PA 19104  
Tel. 301.509.1508  
Email: [Lgibbons@nrg.com](mailto:Lgibbons@nrg.com)

Ryan Harwell  
Regulatory Licensing and Reporting Manager  
910 Louisiana Street  
Houston, TX 77002  
Tel. 281.800.6157  
Email: [Ryan.Harwell@nrg.com](mailto:Ryan.Harwell@nrg.com)

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.

**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.**

Please do not hesitate to contact me should you have any questions or concerns regarding this Annual Compliance Filing.

Sincerely,

*Sarah C. Stoner*

Sarah C. Stoner

Enclosures

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

## VERIFICATION

I, Ryan Harwell, state that I am a Regulatory Licensing and Reporting Manager for NRG Energy, Inc. 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).

Dated: 10/4/2022



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Ryan Harwell  
Regulatory Licensing & Reporting Manager  
NRG Energy, Inc.

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# **APPENDIX A**

**[CONFIDENTIAL]**

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# **APPENDIX B**

**[CONFIDENTIAL]**

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# APPENDIX C

**[CONFIDENTIAL]**

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# **APPENDIX D**

**[CONFIDENTIAL]**

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the **public version** 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  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
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

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Pike County Light & Power Company  
Vice President – Energy Supply  
Corning Natural Gas Holding Corporation  
330 West William Street  
Corning, NY 14830

Dated: October 5, 2022

*Sarah C. Stoner*

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Sarah C. Stoner, Esq.

ORIGIN ID:MDTA (717) 236-7067  
SARAH STONER, ESQUIRE  
ECKERT SEAMANS CHERIN & MELLOTT  
213 MARKET STREET  
8TH FLOOR  
HARRISBURG, PA 17101  
UNITED STATES US

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HARRISBURG PA 17120

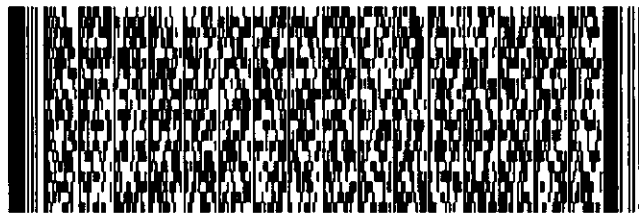
(717) 772-7777

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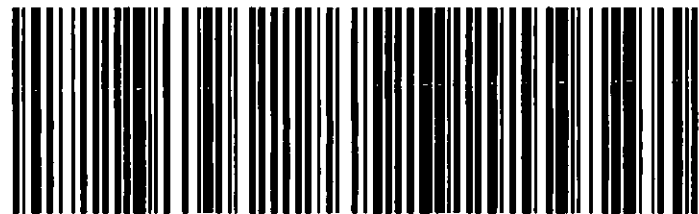


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