

NRG Energy, Inc. 3711 Market Street Philadelphia, PA 19104

November 9, 2022

VIA UPS & E-FILE

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

Re: Electric Generation Supplier License Application Amendment for a Name Change Docket No. A-110025; Utility Code 110025

Dear Secretary Chiavetta:

On September 26, 2022 Direct Energy Business, LLC ("DEB") filed an application amendment to add a new trade name under which DEB proposes to do business in the Commonwealth of Pennsylvania. DEB is an indirect wholly owned subsidiary of NRG Energy, Inc. ("NRG").

On October 14, 2022 the Bureau of Technical Utility Services requested additional information to be filed within 30 days. Attached is NRG's response to the request for information, as well as its Verification of the accuracy of the information provided.

Should you have any questions or require additional information, please contact me at 301.509.1508 or via email at lgibbons@nrg.com.

Sincerely,

Leah Gibbons

Senior Director Regulatory Affairs

Enclosures

VERIFICATION

I, Leah Gibbons, hereby state that I am Senior Director of Regulatory Affairs of NRG Energy, Inc., and am authorized to make this verification on its behalf. I hereby state that the facts above set forth 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 a hearing held 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).

November 9, 2022

Dated

Leah Gibbons

Senior Director Regulatory Affairs

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Docket No. A-110025 Direct Energy Business, LLC Data Requests

1. Reference Application, Section 2, Business Entity Filings and Registration – Applicant lists its name in this filing as "Direct Energy Business, LLC". However, The Pennsylvania Department of State lists the applicant's name as "DIRECT ENERGY BUSINESS, LLC" (notice the capitalizations). Please contact the Pennsylvania Department of State to update applicant's name within the Commonwealth of Pennsylvania to be "Direct Energy Business, LLC", then provide notice of this change to the Commission.

Response: NRG has filed an amendment of Foreign Registration Statement with the Pennsylvania Department of State to correct the capitalization of Direct Energy Business, LLC's legal entity name. **Please see Attachment A**.

2. Regarding Customer Notice – Applicant failed to provide its customer notice for this name change. Please provide the missing documentation.

Response: Please see **Attachment B** for NRG's sample notice template.

NRG Energy, Inc.

Certificate of Service

On this the 9th day of November 2022, I certify that a true and correct copy of the foregoing filing and all NON-CONFIDENTIAL attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

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

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

Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120

Department of Revenue Bureau of Compliance PO 80x 281230 Harrisburg, PA 17128-1230

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

Vice President - Energy Supply Corning Natural Gas Holding Corporation 330 West William Street Corning, NY 14830 Legal Department

West Penn Power d/b/a Allegheny Power 800 Cabin Hill Drive Greensburg, PA 15601-1689 Manager Energy Acquisition PECO Energy Company 2301 Market Street Philadelphia, PA 19101-8699

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

Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

Legal Department First Energy 2800 Pottsville Pike Reading PA, 19612

UGI Utilities, Inc. Attn: Rates Dept. -- Choice Coordinator 1 UGI Drive Denver. PA 17517

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

> Leah Gibbons, Senior Director Regulatory Affairs, NRG Energy, Inc.

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ATTACHMENT A



Pennsylvania Department of State

Bureau of Corporations and Charitable Organizations PO Box 8722 | Harrisburg, PA 17105-8722 T: 717.787.1057 dos.pa.gov/BusinessCharities

November 9, 2022

CT Corporation System 600 NORTH SECOND STREET, SUITE 401 HARRISBURG, PA 17101

Entity Name:

DIRECT ENERGY BUSINESS, LLC

Amendment Date:

November 9, 2022

Amendment Number:

0003558036

Amendment Type:

Amendment of Foreign Registration

Statement

The Bureau of Corporations and Charitable Organizations is happy to send your filed document. The Bureau is here to serve you and we would like to thank you for doing business in Pennsylvania.







COMMONWEALTH OF PENNSYLVANIA

Department of State

Bureau of Corporations and Charitable Organizations PO Box 8722

Harrisburg, Pennsylvania 17105-8722

AMENDMENT OF

FOREIGN REGISTRATION STATEMENT

Fee: \$250

Pennsylvania Department of State

-FILED-

Amendment #: 0003558036 Date Filed: 11/9/2022

DSCB:15-413 (rev. 2/2017)

In compliance with the requirements of 15 Pa.C.S. § 413 (relating to amendment of foreign registration statement), the undersigned foreign association desires that its registration be amended to change the following information:

Foreign Business Information

File number

0002838495

Current name

DIRECT ENERGY BUSINESS, LLC

Filing type

Foreign Limited Liability Company

LLC filing subtype

Limited Liability Company

Effective Date

The filing shall be effective upon filing in the Department of State

Association Name

The full and proper name of the foreign association as

registered in its jurisdiction of formation is

Direct Energy Business, LLC

Business name in Pennsylvania

Direct Energy Business, LLC

Additional Information

Jurisdiction of Formation

DELAWARE

Series

The association may not have series.

Current Registered Office or Commercial Registered Office Provider

Search for Commercial Registered Office Provider (CROP)

CT Corporation System

Commercial Registered Office Provider

Venue and Publication County

Dauphin

The street address of the association's principal office.

Current Principal Office Address

None

The mailing address of the association's principal office.

Current Mailing Address

Additional Changes (Optional)

Additional changes

There are no additional changes

Electronic Signature

IN TESTIMONY WHEREOF, the above-named association has caused this Amendment of Foreign Registration Statement to be signed by a duly authorized representative.

Full Name	Title	Date
Paolo Berard	Secretary	10/18/2022

ATTACHMENT B



Month, day, 2023

<<Company>>
<<Attn>> <<Contact>>
<<Address>>
<<City>>, <<State>> <<Zip>>>

Important Information About Your << Natural Gas or Electricity>> Service From Direct Energy Business and NRG

Dear Valued Customer.

Thank you for your continued business. As we've communicated previously, Direct Energy Business became part of NRG Energy, Inc. in January 2021. Since then, the companies have been working hard to bring together our people, platforms and technology to provide a best-in-class experience for valued business customers like you under one single brand—NRG. As such, you will notice a shift in branding from << Direct Energy Business or Direct Energy Business Marketing>> to NRG in the coming weeks.

What does this mean to my business?

There are a few changes you will notice related to branding, but the most important parts of our relationship will remain unchanged, including:

- your energy supply agreement
- your product
- account number(s)
- invoice style
- remittance procedures

The changes you can expect include:

- your invoice will soon be branded NRG (if you're billed by the utility on our behalf, you will see <<"NRG Business" or "NRG Business Marketing" or "NRG">> referenced, instead of <<"Direct Energy Business" or "Direct Energy Business Marketing">>)
- your online account management tool, MyAccount, will include the NRG logo
- your experienced U.S.-based customer support team will now be referenced as "NRG Client Services" and will have a new toll-free number/email

Do I need to do anything?

You do not need to take action on any items at this point—we just wanted to make sure you were aware that these changes were coming so you could be prepared for what to expect.

If you have any questions about these changes, please do not hesitate to call us. Thank you again for your continued business.

Warmest Regards,

NRG Client Services 844.737.6742 GasSupport@nrg.com