

# Stevens & Lee

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July 31, 2023

**DATE OF DEPOSIT**

**VIA FEDERAL EXPRESS**

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

**JUL 31 2023**

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	<b>DATE OF DEPOSIT</b>
Continued Reduction in Security	:		
Amount and Continued Use of	:		
Parental Guarantee to Satisfy its	:		<b>JUL 31 2023</b>
Security Requirement	:		

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**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. 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, in 2019, 2020, 2021, and 2022, all of which were approved.

11. 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.

12. 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.

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

14. 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.

15. 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").

16. 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 2022 through June of 2023, and calculation of 5% gross receipts amount for its financial security.

17. Attached hereto as **Confidential Exhibit 2** is the transaction confirmation from the Pennsylvania Department of Revenue reflecting the March 2023 prepayment of WGL Energy's estimated Gross Receipts Tax obligation. This information was previously reflected in the Department of Revenue's Rev-423 form. The report formatting has changed since the implementation of the Department of Revenue new myPATH system as a replacement for the now retired e-TIDES system.

18. Attached hereto as **Confidential Exhibit 3** is a copy of WGL Energy's quarterly report of Gross Receipts for the second quarter of 2023.

19. 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.

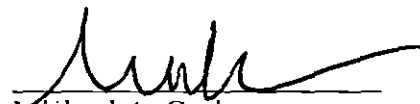
20. Enclosed herewith is an updated Parental Guarantee from AltaGas, Ltd., reflecting a guarantee amount that is equal to WGL Energy's updated 5% of gross receipts. The Parental Guarantee has been marked as Confidential for filing under seal.

21. 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.

22. 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 31, 2023

  
Michael A. Guin  
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.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WGL Energy Services, Inc.  
Continued Reduction in Security  
Amount and Continued Use of  
Parental Guarantee to Satisfy its  
Security Requirement

: Docket No. A-110158  
:  
:  
:  
:

**DATE OF DEPOSIT**

JUL 31 2023

**VERIFICATION**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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.

Phillip G Woodyard

Name: Phillip G Woodyard

7/24/23  
Date:

**LAURA LUCY RULLAN**  
NOTARY PUBLIC  
REG. #7603450  
COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES MARCH 31, 2026

*Laura Rullan*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**      **DATE OF DEPOSIT**

WGL Energy Services, Inc. Continued Reduction in Security Amount and Continued Use of Parental Guarantee to Satisfy its Security Requirement	: : : : :	Docket No. A-110158	JUL 31 2023	PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU
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I hereby certify that on this 31st day of July 2023 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 31, 2023



Michael A. Guin, Esq.



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

SHIP DATE: 31 JUL 23  
ACTWGT: 1.00 LB  
CAD: 2561228867/NET4640

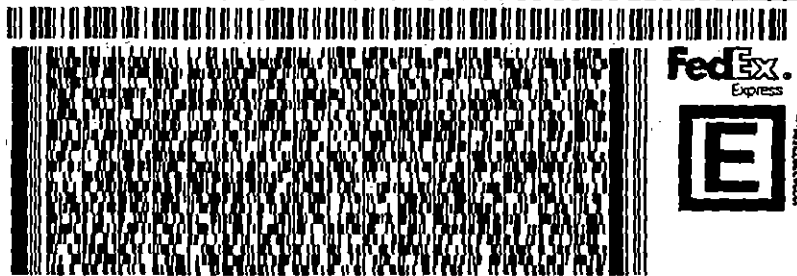
17 N 2ND STREET  
16TH FL  
HARRISBURG, PA 17101  
UNITED STATES US

BILL SENDER

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

583.GIA1409/AE3

(800) 692-7380 REF: 106431-00003  
INV. PO. DEPT.



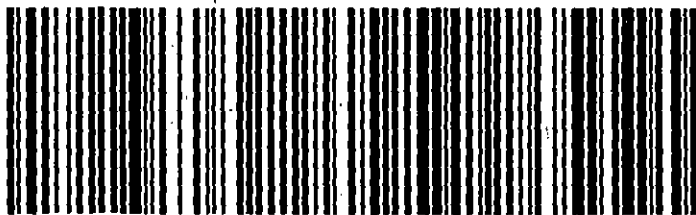
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PRIORITY OVERNIGHT

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RECEIVED

AUG 1 2023

PA PUBLIC UTILITY COMMISSION  
BUREAU