

**ECKERT**  
**SEAMANS**  
ATTORNEYS AT LAW

Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

TEL 717 237 6000  
FAX 717 237 6019  
www.eckertseamans.com

Sarah C. Stoner  
717.237.6026  
sstoner@eckertseamans.com

January 11, 2024

**Via Hand Delivery**

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

RCVD PUC SEC BUR  
JAN 11 2024 PM 3:21

**RE: Annual Compliance Filing of Independence Energy Group, LLC d/b/a Cirro Energy  
for Continuation of 5% Reduction in Security Requirements;  
Docket No. A-2011-2262337; Utility Code 1113888**

Dear Secretary Chiavetta:

Independence Energy Group, LLC d/b/a Cirro Energy ("Cirro Energy") received authority to reduce its security with the Pennsylvania Public Utility Commission from 10% to 5% of its most recent twelve months of revenue, pursuant to a Secretarial Letter dated February 4, 2020. The Commission subsequently granted Cirro Energy continuation of that 5% reduction in security requirements on an annual basis. Cirro Energy files this Annual Compliance Filing to renew its security at the reduced level of 5% based on its most recent twelve months of revenue.

Cirro Energy provides the following information and documentation in support of its Annual Compliance Filing:

- 1) A spreadsheet of Cirro Energy's gross receipts in Pennsylvania for the most-recent 12 months (October 2022 through September 2023) attached hereto as Appendix A (**CONFIDENTIAL**);
- 2) A Gross Receipts Statement of Account from the Pennsylvania Department of Revenue confirming that Cirro Energy has prepaid gross receipts, attached as Appendix B (**CONFIDENTIAL**);
- 3) A letter from the AEPS Administrator confirming Cirro Energy's compliance with AEPS requirements attached hereto as Appendix C (**CONFIDENTIAL**);
- 4) A Sales and Use Tax Statement of Account from the Pennsylvania Department of Revenue to evidence that it is current with its tax liabilities to the Commonwealth, attached as Appendix D (**CONFIDENTIAL**);

5) An original bond continuation certificate attached as Appendix E  
(**CONFIDENTIAL**); and

6) Cirro Energy is compliant with the Commission's annual and supplemental fee requirements.

The Cirro 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)

A verification attesting to the truthfulness of facts set forth in Cirro Energy's request is enclosed. 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.**

Should you have any questions or concerns regarding this Annual Compliance Filing, please feel free to contact me.

Sincerely,

*Sarah C. Stoner*

Sarah C. Stoner

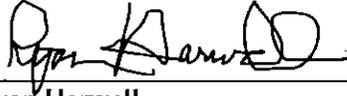
Enclosures

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 Independence Energy Group, LLC d/b/a Cirro Energy, 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: 1/8/2024



---

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

RECEIVED

JAN 11 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

RECEIVED

JAN 11 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# APPENDIX A

**[CONFIDENTIAL]**

RECEIVED

JAN 11 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# APPENDIX B

**[CONFIDENTIAL]**

RECEIVED

JAN 11 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# APPENDIX C

**[CONFIDENTIAL]**

RECEIVED

JAN 11 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# APPENDIX D

**[CONFIDENTIAL]**

RECEIVED

JAN 11 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# APPENDIX E

**[CONFIDENTIAL]**

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the **public version** of Independence Energy Group, 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

Met-Ed, Penelec, and Penn Power:  
Legal Department  
First Energy  
2800 Pottsville Pike  
Reading PA, 19612

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
Harrisburg, PA 17128

Citizens' Electric Company  
Attn: EGS Coordination  
1775 Industrial Boulevard  
Lewisburg, PA 17837

Office of Consumer Advocate  
5th Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101-1923

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

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

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

Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

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

Legal Department  
West Penn Power d/b/a Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

UGI Utilities, Inc.  
Attn: Rates Dept. – Choice Coordinator  
2525 N. 12th Street, Suite 360  
Post Office Box 12677  
Reading, PA 19612-2677

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

**RECEIVED**

**JAN 11 2024**

#114847262v1

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

Dated: January 11, 2024

*Sarah C. Stoner*

---

Sarah C. Stoner, Esq.