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February 25, 2025

Via Hand Delivery

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

RCVD PUC SEC BUR
FEB 25 2025 PM 1:42

**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 2023 through September 2024) 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 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 C (**CONFIDENTIAL**);
- 4) A copy of Cirro Energy's Pennsylvania Department of Revenue REV-423 Specialty Tax Estimated Payment Form as proof that it prepaid 2024 gross receipts, attached as Appendix D (**CONFIDENTIAL**);

- 5) A letter from the AEPS Administrator confirming Cirro Energy's compliance with AEPS requirements attached hereto as Appendix E (**CONFIDENTIAL**);
- 6) An original bond rider and continuation certificate attached as Appendix F (**CONFIDENTIAL**); and
- 7) 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
2929 Arch Street, Suite 1902
Philadelphia, PA 19104
Tel. 301.509.1508
Email: 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

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

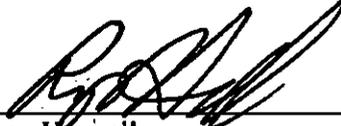
cc: Stephen Jakab, Bureau of Technical Utility Services (with appendices)
Certificate of Service (without appendices)

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: _____

2/20/25



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

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy 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

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, 1st 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

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

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Dated: February 25, 2025

Sarah C. Stoner
Sarah C. Stoner, Esq.