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April 1, 2025

**VIA ELECTRONIC FILING**

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

RE: Philadelphia Gas Works' ("PGW") (PUC Certificate No. A-125042)  
Annual Licensee Security Report for Year Ended December 31, 2024  
52 Pa. Code § 62.111(c)(5); Docket No. M-2025-3052811

Dear Secretary Chiavetta:

Enclosed for electronic filing, please find Philadelphia Gas Works' ("PGW") Annual Licensee Security Report for year ended December 31, 2024, as required by 52 Pa. Code § 62.111(c)(5).

Please contact us if you require anything additional.

Sincerely,

A handwritten signature in black ink that reads "Deanne M. O'Dell". The signature is written in a cursive, flowing style.

Deanne M. O'Dell

DMO/jls  
Enclosure

**Philadelphia Gas Works  
PUC Licensee Security Report  
Calendar Year 2024**

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Philadelphia Gas Works (“PGW”), in accordance with the requirements of 52 Pa. Code § 62.111(c)(5) hereby reports the following for the calendar year of 2024:

**(i) The criteria that is used to establish the amount of security that an applicant<sup>1</sup> must provide to the NGDC in order to be granted a license by the Commission.**

- See PGW Gas Supplier Tariff, PUC No. 1 Original Page No. 20 for supplier qualifications.

**(ii) The criteria that is used to determine the amount of security that a licensee<sup>2</sup> must provide to ensure its financial responsibility in order to maintain a license.**

- Licensees that are actively providing natural gas supply to PGW’s firm transportation customers provide security to PGW. To the extent that the usage of a licensee’s customers exceeds the quantities delivered by the licensee during November to March (Winter Season), the licensee reimburses PGW in kind. The amount of security is based on the value of the in kind replacement volumes.

**(iii) The criteria that is used to determine that a change in the amount of security is needed for the licensee to maintain a license.**

- Generally, a material change in the value of in kind replacement volumes. See 52 Pa. Code §62.111 for other criteria.

**(iv) The number of instances in the last year that the NGDC determined that a change in the amount of security was needed for a licensee to maintain its license. For each instance, the following information shall be reported:**

**(A) The name of the licensee involved.**

**(B) The date of the NGDC’s determination.**

**(C) The reason for the determination.**

**(D) The licensee’s response to the NGDC determination.**

- See Attachment A.

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<sup>1</sup> § 62.101. Definitions. *Applicant*—A person or entity seeking to obtain a license to supply retail natural gas supply services to retail customers.

<sup>2</sup> § 62.101. Definitions. *Licensee*—A person or entity that has obtained a license to provide natural gas supply services to retail customers.

**(v) The types of legal instruments, financial instruments and property, real and personal, that the NGDC accepted as security for licensing purposes. For each security type reported, the following information shall be reported:**

**(A) The name of the applicant or licensee involved.**

**(B) The name and address of the bank, company or other entity that is acting as the surety or guarantor.**

**(C) The amount of security.**

**(D) The date that the security was posted.**

- See Attachment A.

# ATTACHMENT A

| (iv) The number of instances in the last year that the NGDC determined that a change in the amount of security was needed for a licensee to maintain its license. For each instance, the following information shall be reported: |   |                                       |  | (v) The types of legal instruments, financial instruments and property, real and personal, that the NGDC accepted as security for licensing purposes. For each security type reported, the following information shall be reported: |  |   |  |           |
|---|---|---------------------------------------|--|---|--|---|--|-----------|
| (A) The name of the licensee involved.  | (B) The date of the NGDC's determination.               | (C) The reason for the determination. | (D) The licensee's response to the NGDC determination. | (A) The name of the applicant or licensee involved.   | (B) The name and address of the bank, company or other entity that is acting as the surety or guarantor.   | (C) The amount of security.                                   | (D) The date that the security was posted. |           |
| 2024  | Direct Energy   | Jan-24                                | Change in Firm Pool Size                               | Accepted calculation  | NRG Energy, Inc. on behalf of Direct Energy Business Marketing Security Type: NRG Energy, Inc. on behalf of Green Mountain Energy Company  | Naixis, New York Branch New York, NY Standby Letter of Credit | \$805,000.00                               | 1/27/2024 |
| 2024  | Green Mountain Energy                                   | Dec-23                                | Continuation   | Accepted calculation  | NRG Energy, Inc. on behalf of Green Mountain Energy Company Security Type: Citibank, N.A. Tampa FL, 33610  | \$41,000.00   | 12/27/2024                                 |           |
| 2024  | Greenlight Energy                                       | Jul-24                                | Continuation   | Accepted calculation  | Greenlight Energy Inc. Security Type: Contractors Bonding & Insurance Co. Peoria IL Surety Bond  | \$15,000.00   | 7/20/2024                                  |           |
| 2024  | Mpower Energy   | Jan-24                                | Change in Firm Pool Size                               | Accepted calculation  | Mpower Energy NJ, LLC Security Type: Philadelphia Indemnity Insurance Co. Bala Cynwyd, PA Surety Bond  | \$422,000.00  | 1/14/2024                                  |           |
| 2024  | Indra Energy  | Jun-24                                | Change in Firm Pool Size                               | Accepted calculation  | PALMco Energy PA, LLC Security Type: Platte River Insurance Co. Middleton, Wisconsin Surety Bond   | \$161,000.00  | 6/20/2024                                  |           |
| 2024  | Shipley Energy  | Jun-24                                | Change in Firm Pool Size                               | Accepted calculation  | Shipley Choice, LLC Security Type: Endurance Assurance Corporation State of Delaware Surety Bond   | \$37,000.00   | 6/28/2024                                  |           |
| 2024  | Sprague Operating Resources                             | Dec-24                                | Change in Firm Pool Size                               | Accepted calculation  | Sprague Operating Resources LLC Security Type: Euler Hermes North America Insurance Company State of Maryland Surety Bond  | \$451,000.00  | 12/31/2024                                 |           |
| 2024  | SFE Energy  | Feb-24                                | Change in Firm Pool Size                               | Accepted calculation  | SFE Energy PA, INC. Security Type: Atlantic Specialty Insurance Company Plymouth, Minnesota Surety Bond  | \$892,000.00  | 2/1/2024                                   |           |
| 2024  | Vista Energy  | Jan-24                                | Change in Firm Pool Size                               | Accepted calculation  | Vista Energy Marketing, LP Security Type: Western Surety Company Sioux Falls, South Dakota Surety Bond   | \$182,000.00  | 1/3/2024                                   |           |
| 2024  | Statewise Energy  | Jun-24                                | Change in Firm Pool Size                               | Accepted calculation  | StateWise Energy PA, LLC Security Type: The Guarantee Co. of NA USA Southfield, Michigan Surety Bond   | \$37,000.00   | 6/19/2024                                  |           |
| 2024  | Alpha Gas and Electric, LLC                             | Jul-24                                | Change in Firm Pool Size                               | Accepted calculation  | Alpha Gas and Electric, LLC Security Type: The Ohio Casualty Insurance Company Orland Park IL, 60467 Surety Bond   | \$3,000.00  | 7/8/2024                                   |           |
| 2024  | South Bay Energy  | Sep-24                                | Change in Firm Pool Size                               | Accepted calculation  | South Bay Energy Corp. Security Type: Swiss Re Corporate Solutions Premier Insurance Company State of Missouri Surety Bond   | \$12,000.00   | 9/25/2024                                  |           |
| 2024  | The Energy Coop   | Sep-24                                | Change in Firm Pool Size                               | Accepted calculation  | Energy Cooperative Association of PA Security Type: Travelers Casualty & Surety Co. of America State of Connecticut Surety Bond  | \$27,000.00   | 9/4/2024                                   |           |
| 2024  | Atlantic Energy   | Jul-24                                | Change in Firm Pool Size                               | Accepted calculation  | Atlantic Energy Group, LLC Security Type: Platte River Insurance Co. Madison, Wisconsin Surety Bond  | \$42,000.00   | 7/16/2024                                  |           |
| 2024  | Major Energy Services                                   | Dec-24                                | Change in Firm Pool Size                               | Accepted calculation  | Major Energy Services, LLC Security Type: Liberty Mutual Insurance Company State of Pennsylvania Surety Bond   | \$371,000.00  | 12/6/2024                                  |           |
| 2024  | Xoom Energy   | Dec-24                                | Change in Firm Pool Size                               | Accepted calculation  | NRG Energy, Inc. on behalf of Xoom Energy Pennsylvania, LLC Security Type: Federal Insurance Company State of New Jersey Surety Bond   | \$88,000.00   | 12/3/2024                                  |           |
| 2024  | Green Choice Energy                                     | Dec-24                                | Change in Firm Pool Size                               | Accepted calculation  | RPA Energy, Inc. Security Type: Platte River Insurance Co. Middleton, WI Surety Bond   | \$17,000.00   | 12/16/2024                                 |           |
| 2024  | Residents Energy  | May-24                                | Change in Firm Pool Size                               | Accepted calculation  | Residents Energy LLC Security Type: Great American Insurance Company State of Ohio Surety Bond   | \$368,000.00  | 5/12/2024                                  |           |
| 2024  | Woodruff Energy   | Feb-24                                | Continuation   | Accepted calculation  | Woodruff Energy US, LLC Security Type: Capitol Indemnity Corporation State of Wisconsin Surety Bond  | \$94,000.00   | 2/6/2024                                   |           |
| 2024  | American Power & Gas of Pennsylvania, LLC               | Jul-24                                | Change in Firm Pool Size                               | Accepted calculation  | American Power & Gas of Pennsylvania, LLC Security Type: Harco National Insurance Company/International Fidelity Insurance Company State of Illinois/State of New Jersey Surety Bond | \$173,000.00  | 7/13/2024                                  |           |
| 2024  | Inspire Energy Holdings, LLC                            | Sep-24                                | Continuation   | Accepted calculation  | Inspire Energy Holdings, LLC Security Type: Travelers Casualty and Surety Company of America State of Connecticut Surety Bond  | \$665,000.00  | 9/10/2024                                  |           |
| 2024  | All Choice Energy MidAmerica LLC dba Raava Energy       | Jul-24                                | Continuation   | Accepted calculation  | All Choice Energy MidAmerica LLC dba Raava Energy Security Type: Arch Insurance Company State of Missouri Surety Bond  | \$18,000.00   | 7/18/2024                                  |           |
| 2024  | Titan Gas LLC dba CleanSky Energy                       | Nov-24                                | Continuation   | Accepted calculation  | Titan Gas LLC dba CleanSky Energy Security Type: Capitol Indemnity Corporation State of Wisconsin Surety Bond  | \$38,000.00   | 11/2/2024                                  |           |
| 2024  | New Wave Energy Corp.                                   | Jun-24                                | Change in Firm Pool Size                               | Accepted calculation  | New Wave Energy Corp Security Type: RLI Insurance Company State of Illinois Surety Bond  | \$55,000.00   | 6/19/2024                                  |           |
| 2024  | Sprague Operating Resources dba Sprague Energy Services | Oct-24                                | New Supplier   | Accepted calculation  | Sprague Operating Resources dba Sprague Energy Services Security Type: Euler Hermes North America Insurance Company State of Maryland Surety Bond                                    | \$150,000.00  | 10/31/2024                                 |           |