



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

August 1, 2025

Docket No. G-2025-3056345
Utility Code: 130175

DAVID P ZAMBITO ESQ
COZEN O CONNOR
17 N 2ND ST STE 1410
HARRISBURG PA 17101

Re: Affiliated Interest Agreement – Energy Center Harrisburg LLC and Energy Center Paxton LLC

Dear Mr. Zambito:

On July 17, 2025, Energy Center Harrisburg, LLC (ECH) filed with the Pennsylvania Public Utility Commission (Commission), pursuant to 66 Pa. C.S. §§ 2102, *et seq.*, the above-referenced Affiliated Interest Agreement (AIA or Agreement). In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached questions.

Please forward the requested information to the Secretary of the Commission **within 20 days** of the date of this letter. Failure to respond may result in the application being denied. Also, if ECH has decided to withdraw its AIA, please reply notifying the Commission of such a decision. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response and mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], 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).

Signature _____

Title _____

Date _____

In addition, to expedite completion of the application, please send a copy of your response to Lee Yalcin at lyalcin@pa.gov. If any problems arise that prevent a full timely response or if any clarification of these data requests is needed, please contact Lee Yalcin of the Bureau of Technical Utility Services via e-mail at lyalcin@pa.gov (preferred) or (717) 787-6723.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure

Docket No. G-2025-3056345
Energy Center Harrisburg, LLC
Data Requests

TUS-1. The predecessor to this AIA, approved on August 25, 2011, between NRG Energy Center Harrisburg LLC and NRG Energy Center Paxton LLC at Docket No. G-2010-2212424, established a monthly billing rate of \$24,000, charged by NRG Energy Center Harrisburg LLC to NRG Energy Center Paxton LLC. Given the economic impact of inflation and the general rise in operations, maintenance, and other costs since 2011, please provide a detailed justification for the proposed reduced monthly charge of \$15,906, approximately \$8,000, or 34%, less than the previously approved rate.

To assist in our review, please address the following:

- Scope of Services: Has the scope or quantity of services provided changed in a manner that justifies the reduction in monthly charges? If so, please describe the changes in scope or service level in detail.
- Cost Breakdown: Please provide a breakdown of the proposed \$15,906 monthly charge by service category (e.g., operations, maintenance, administrative, utilities, etc.). Include any supporting calculations, assumptions, or cost allocation methodologies used to derive the total monthly charge.

TUS-2. Explain all revenue and ratemaking implications that the Agreement may have.

TUS-3. Please clarify whether the proposed Agreement will result in any additional costs to ECH that are not explicitly addressed or reimbursed under the terms of the Affiliated Interest Agreement (AIA). If such costs are anticipated, please identify them and explain how they will be treated for both accounting and ratemaking purposes.