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August 28, 2025

VIA E-FILING (PUBLIC VERSION) AND
HAND-DELIVERED (CONFIDENTIAL VERSION)

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Hudson Energy Services, LLC., Security Renewal Compliance
Filing Docket No. A-2010-2192137
Utility Code: 1112538

Dear Secretary Homsher:

Enclosed for filing is the Security Renewal Compliance Filing of Hudson Energy Services, LLC. (“Hudson”), a licensed energy generation supplier (“EGS”).

The Compliance Filing includes commercially valuable and sensitive information for which Hudson requests confidential treatment. Accordingly, enclosed is a version of the Compliance Filing marked “Public Version” for inclusion in the public record is being E Filed, and a version of the Compliance Filing marked “Confidential Version” is being hand-delivered to the Pennsylvania Public Utility Commission (“Commission”) today. **Hudson respectfully requests that the Confidential Version of its Compliance Filing be maintained by the Pennsylvania Public Utility Commission under seal.**

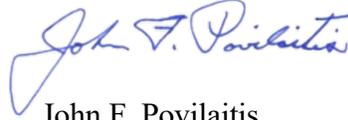
Please note that the original of the renewed security is included in the Confidential Version of this filing that will be hand-delivered today to the Commission. Proof of payment of the Commission’s supplemental assessment fee will be submitted after the fee is invoiced later this year and paid.

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Copies of the Public Version of Hudson's Compliance Filing have been served on each of the statutory parties, the Commission's Bureau of Technical Utility Services, the Commonwealth of Pennsylvania's Department of Revenue, the Office of Attorney General's Bureau of Consumer Protection and all affected Pennsylvania electric distribution companies, as indicated in the attached Certificate of Service.

Please contact the undersigned if you have any questions regarding this filing. Thank you for your attention to this matter.

Very truly yours,



John F. Povilaitis

JFP/psm
Enclosures

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Hudson Energy Services, LLC. : Docket No. A-2010-2192137
Security Compliance Filing :

HUDSON ENERGY SERVICES, LLC. COMPLIANCE FILING

I. Introduction

1. Hudson Energy Services, LLC. (“Hudson” or “Company”) is an electric generation supplier (“EGS”) authorized by the Pennsylvania Public Utility Commission (“PaPUC” or “Commission”) to provide electric generation supplier services to residential, small commercial, large commercial, industrial and governmental customers in the electric distribution company service territories within the Commonwealth of Pennsylvania. Hudson received its license to operate as an EGS by Order of February 11, 2011 at Docket No. A-2010-2192137. As a licensed EGS, Hudson is subject to the Commission’s authority to require it to furnish a bond or other security in order to operate in the Commonwealth of Pennsylvania, pursuant to Section 2809(c) of the Public Utility Code (“Code”) and Section 54.40 of the Commission’s regulations. 66 Pa.C. S. §2809(c); 52 Pa. Code §54.40.

2. Section 54.40(d) of the Commission’s regulations requires EGSs to provide a security level of 10% of the licensee’s reported gross receipts. However, a licensee may seek approval from the Commission of an alternative level of bonding, commensurate with the nature and scope of its operations. 52 Pa.Code §54.40(d). According to the Commission’s regulations, the purpose of the bond is to ensure payment of the Pennsylvania Gross Receipts Tax (“GRT”) and to ensure the supply of electricity at the retail level in accordance with contracts, agreements or arrangements. 52 Pa.Code §54.40(f)(2). On July 24, 2014, after consideration of formal

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comments submitted to a December 5, 2013 Tentative Order, the Commission found that requiring an EGS to post a bond or security in the amount of 10% of gross receipts after the first year of operation “may be excessive in relation to the risk intended to be secured, unnecessarily burdening EGSs, and presenting a potential barrier to entry into Pennsylvania’s retail electric market.”¹ Therefore, the Commission announced in the July 24, 2014 Order that it was adopting the policy of accepting applications by EGSs to reduce their level of bonding/security after the first year of operation to 5% of the EGS’s most recent 12 months of gross revenue or \$250,000, whichever is higher. In addition, the July 24, 2014 Order delegated authority to review uncontested requests for a reduction in the level of bonding to the Bureau of Technical Utility Services.² In an Order entered September 20, 2018, the Commission streamlined the process for EGSs to obtain reductions in their annual security obligations and permitted, *inter alia*, the filing of a Compliance Filing for renewal of security rather than a formal Petition.³

3. Based on the July 24, 2014 Order, the September 20, 2018 Order, the Code, the Commission’s regulation at Section 54.40(d) and the following supporting material, Hudson respectfully requests that the Commission accept and approve its annual security compliance filing.

4. By Secretarial Letter Dated June 14, 2023 at Docket No. A-2010-2192137, Utility Code 1112538, the Commission approved Hudson’s February 24, 2023 Petition for a security reduction, effective to November 30, 2023. The Company requests renewal of the security reduction and has provided the information to support an extension of the security reduction in this filing. Similar compliance filings are being made for Hudson’s two other affiliates - Just Energy

¹ *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments*, Docket No. M-2013-2393141 (July 24, 2014) (“July 24, 2014 Order”) at 10.

² July 24, 2014 Order at 12-13.

³ *Petition of the Retail Energy Supply Association to Simplify the Financial Security 5% Renewal Process*, Docket No. P-2017-2608078 (Order Entered September 20, 2018) at 17-20.

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Solutions Inc. (“JES”), Docket No. A-110117, and Just Energy Pennsylvania Corp. (“JEPC”), Docket No. A-2009-2097544 (collectively, the “Companies”).

II. Information Provided in Support of Security Compliance Filing

5. This Compliance Filing includes Confidential Attachments 1 through 6.
6. Confidential Attachment 1 provides Hudson’s gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent twelve (12) months, and a calculation of 5% of those reported gross revenues.
7. Confidential Attachment 2 is a Tax Status Letter of Good Standing obtained by Hudson from the Pennsylvania Department of Revenue (“DOR”).
8. Confidential Attachment 3 provides confirmation of Hudson’s gross receipts tax paid.
9. Confidential Attachment 4 is confirmation of AEPS Act compliance.
10. Confidential Attachment 5 is confirmation of payment of commission assessment fee.
11. Confidential Attachment 6 is a copy of Hudson’s renewed security. An original security document will be delivered under separate cover to the Commission.
12. Based on the foregoing information, Hudson proposes to meet its security renewal requirement with security reflecting 5% of its most recent twelve (12) months of gross revenue. This amount is reasonable and satisfies the requirements of Section 2809(c) of the Public Utility Code and Section 54.40 of the Commission’s regulations. 66 Pa.C. S. §2809(c); 52 Pa. Code §54.40.

III. Relief Requested and Conclusion

Hudson respectfully requests that its Compliance Filing be accepted and approved.

Respectfully submitted,



John F. Povilaitis

Dated: August 28, 2025

Buchanan Ingersoll & Rooney PC
409 North Second Street
Suite 500
Harrisburg, PA 17101
(717) 237-4825

Counsel for Hudson Energy Services, LLC.

Confidential Attachment 1

Gross revenues for the sale of electricity to retail customers in
Pennsylvania for the most recent twelve (12) months

(July 2024 to June 2025)
(REDACTED)

Confidential Attachment 2
Tax Status Letter of Good Standing
(REDACTED)

Confidential Attachment 3

Gross Receipts Tax

(REDACTED)

Confidential Attachment 4
AEPS Act Compliance
(REDACTED)

Confidential Attachment 5
Commission Assessment Fee Payment Proof
(REDACTED)

Confidential Attachment 6

Renewed Security

(REDACTED)

VERIFICATION

I, Sean Fitzpatrick, 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: _____



Hudson Energy Services, LLC.

Title: Manager,
Regulatory Affairs

Date: August 28, 2025

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Hudson Energy Services, LLC. : Docket No. A-2010-2192137
Security Compliance Filing :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via First Class Mail

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

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
PO Box 280947
Harrisburg, PA 17128

Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
PO Box 3265
Harrisburg, PA 17105-3265

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

Office of Attorney General
Bureau of Consumer Protection
15th Floor, Strawberry Square
Harrisburg, PA 17120

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

Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
Harrisburg, PA 17105

Legal Department
First Energy
2800 Pottsville Pike
Reading, PA 19612

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

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

Legal Department
West Penn Power Company
800 Cabin Hill Drive
Greensburg, PA 15601-1689

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

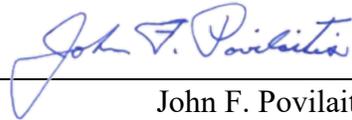
PUBLIC VERSION

Office of General Counsel
Attn: Kimberly Klock PPL
Two North Ninth Street
Allentown, PA 18108-1179

Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

Dated this 28th day of August 2025.



John F. Povilaitis