

Sarah C. Stoner  
717.237.6026  
sstoner@eckertseamans.com

October 7, 2025

**Via Hand Delivery**

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

**RE: Annual Compliance Filing of Direct Energy Services, LLC for Continuation of 5% Reduction in Security Requirements; Docket No. A-110164; Utility Code 110164**

Dear Secretary Homsher:

Please accept this Annual Compliance Filing to renew Direct Energy Services, LLC's ("Direct Energy") required level of financial security at the reduced level of 5% based on its most recent twelve months of revenue. Direct Energy previously received authority to reduce its security with the Pennsylvania Public Utility Commission from 10% to 5% of Direct Energy's most recent twelve months of revenue. The following information and documentation is being provided in support of Direct Energy's Annual Compliance Filing:

- 1) A table of Direct Energy's gross receipts in Pennsylvania for the most-recent 12 months (August 2024 through July 2025) attached hereto as Appendix A **(CONFIDENTIAL)**;
- 2) A copy of Direct Energy's Pennsylvania Department of Revenue REV-423 Specialty Tax Estimated Payment Form as proof that it has prepaid 2025 gross receipts, attached as Appendix B **(CONFIDENTIAL)**;
- 3) A letter from the AEPS Administrator confirming Direct 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) A PA DOR Statement of Account for Gross Receipts attached as Appendix E **(CONFIDENTIAL)**;

6) An original bond rider and continuation certificate attached as Appendix F  
(**CONFIDENTIAL**); and

7) Direct Energy is compliant with the Commission's annual and supplemental fee requirements.

The Direct 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](mailto:Lgibbons@nrg.com)

Ryan Harwell  
Senior 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)

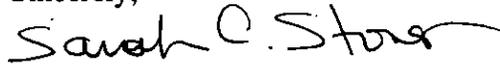
Sarah Stoner, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
Tel. 717.237.6026  
Email: [sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)

Enclosed please find a verification attesting to the truthfulness of facts set forth in Direct Energy's request. 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.**

Please do not hesitate to contact me should you have any questions or concerns regarding this Annual Compliance Filing.

Sincerely,



Sarah C. Stoner

Enclosures

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

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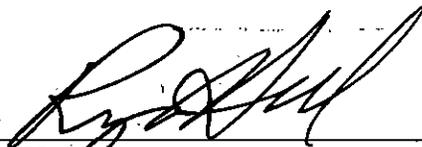
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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

## VERIFICATION

I, Ryan Harwell, state that I am a Senior Regulatory Licensing and Reporting Manager for NRG Energy, Inc. I hereby verify that I am authorized to and do make this Verification for Direct Energy Services, LLC, 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: 10/2/25

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

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**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of Direct Energy Services, 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, 1<sup>st</sup> 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

Dated: October 7, 2025

*Sarah C. Stoner*

Sarah C. Stoner, Esq.

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