

ECKERT
S E A M A N S
ATTORNEYS AT LAW

Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

TEL 717 237 6000
FAX 717 237 6019
www.eckertseamans.com

Sarah C. Stoner
717.237.6026
sstoner@eckertseamans.com

January 15, 2026

Via Hand Delivery

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

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**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 Homsher:

Please accept this Annual Compliance Filing to renew Independence Energy Group, LLC's d/b/a Cirro Energy ("Cirro Energy") required level of financial security with the Pennsylvania Public Utility Commission at the reduced level of 5% of its most recent twelve months of revenue. Cirro Energy initially received authority to reduce its security 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 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 (December 2024 through November 2025) 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 2025 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 continuation certificate (**CONFIDENTIAL**) is being filed under separate cover; 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
Senior Regulatory Licensing
and Reporting Manager
910 Louisiana Street
Houston, TX 77002
Tel. 281.800.6157
Email: Ryan.Harwell@nrg.com

Sarah Stoner, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
Tel. 717.237.6026
Email: sstoner@eckertseamans.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)

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

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

Dated: January 15, 2026

Sarah C. Stoner
Sarah C. Stoner, Esq.

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