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**VIA OVERNIGHT FEDERAL EXPRESS**

June 3, 2026

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

**RE: Electric Generation Supplier License Application (Supplement)**
**Light Energy, LLC d/b/a Light Energy Group ("Light Energy"); Docket No. A-2026-3062117**

Dear Secretary Homsher,

On behalf of Light Energy, as a supplement to the Electric Generation Supplier License Application, attached is the FERC approval issued on May 26, 2028, and PJM Application for Membership with Schedule 4 dated May 27 and 29, 2026, respectively.

Please do not hesitate to contact me at (718) 690-3480 or via email at MichelleMann@Feller.Law with any questions on this matter.

Respectfully,

/s/ *Michelle Mann*
Michelle Mann
Director of Government Affairs and
Regulatory Paralegal
Feller Law Group, PLLC
Phone: (718) 690-3480
Email: michellemann@feller.law

*On behalf of Light Energy, LLC d/b/a Light Energy Group*

Enclosures

**LIGHT ENERGY, LLC**

**FEDERAL ENERGY REGULATORY COMMISSION**
**MARKET-BASED RATE AUTHORIZATION**

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

Light Energy, LLC (Applicant)      Docket No. ER26-2026-000

Issued: May 26, 2026

Reference: Market-Based Rate Authorization

On April 3, 2026, Applicant submitted an application for market-based rate authority with an accompanying tariff. The proposed market-based rate tariff provides for the sale of energy, capacity, and ancillary services at market-based rates as specified in Applicant's tariff. Applicant requests waivers commonly granted to similar market-based rate applicants. Applicant's market-based rate tariff is accepted for filing, effective April 4, 2026, as requested.[1] Based on Applicant's representations, Applicant meets the criteria for a Category 1 seller in all regions, and is so designated.[2]

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[1] Light Energy, LLC, Market-Based Rate, Market-Based Rate, Tariff (0.0.0). If Applicant makes a market-based rate filing with the Commission, it must include a revised tariff in compliance with Order Nos. 697 and 697-A to include appropriate citations. *See Market-Based Rates for Wholesale Sales of Elec. Energy, Capacity & Ancillary Servs. by Pub. Utils.*, Order No. 697, 119 FERC ¶ 61,295, at P 916 (2007), *order on reh'g*, Order No. 697-A, 123 FERC ¶ 61,055, at P 384 (2008). *See also Niagara Mohawk Power Corporation*, 121 FERC ¶ 61,275 (2007) at P 8. Additionally, the Commission removed section 141.14 from its regulations effective March 28, 2019. *Elimination of Form 80 & Revision of Reguls. on Recreational Opportunities & Dev. at Licensed Hydropower Projects*, 165 FERC ¶ 61,256, at P 32 (2018). If Applicant's tariff includes a reference to section 141.14 of the Commission's regulations, the next time Applicant makes a market-based rate filing with the Commission, it must remove language referring to section 141.14 of the Commission's regulations from its tariff. *See Gunvor USA LLC*, 186 FERC ¶ 61,028, at P 32 n.35 (2024).

[2] *See Refinements to Policies and Procedures for Market-Based Rates for Wholesale Sales of Elec. Energy, Capacity & Ancillary Servs. by Pub. Utils.*, Order No. 816, 153 FERC ¶ 61,065, at P 320 (2015). Order No. 697, 119 FERC ¶ 61,295 at PP 848-850. Applicant must file an updated market power analysis for each region in which it is designated as a Category 2 seller in compliance with the regional reporting schedule. *See* Order No. 816, 153 FERC ¶ 61,065 at P 353.

The filing was publicly noticed. No protests or adverse comments were filed. Pursuant to Rule 214 of the Commission's regulations (18 C.F.R. § 385.214), notices of intervention, timely-filed motions to intervene, and any unopposed motions to intervene out-of-time filed before the issuance date of this order are granted.

**Market-Based Rate Authorization**

The Commission allows power sales at market-based rates if the seller and its affiliates do not have, or have adequately mitigated, horizontal and vertical market power.[3]

Applicant provided representations regarding its direct and upstream owners and the business activities of all direct and upstream owners and all affiliates. Applicant also includes representations regarding its horizontal market power analysis.[4] Based on Applicant's representations, Applicant satisfies the Commission's requirements for market-based rate authority regarding horizontal market power.

With respect to vertical market power, Applicant represents that it and its affiliates either do not own, operate, or control any transmission facilities; or own, operate, or control transmission facilities that: (a) have a Commission-approved Open Access Transmission Tariff (OATT) on file; (b) are under the operational control of a regional transmission organization or an independent system operator; (c) have received waiver of the OATT requirement under 18 C.F.R. § 35.28(d)(1); or (d) satisfy the requirements for a blanket waiver under 18 C.F.R. § 35.28(d)(2).[5] Further, Applicant affirmatively states that it and its affiliates have not erected barriers to entry and will not erect barriers to entry into the relevant market. Based on Applicant's representations, Applicant satisfies the Commission's requirements for market-based rate authority regarding vertical market power.

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[3] Order No. 697, 119 FERC ¶ 61,295 at PP 62, 399, 408, 440.

[4] 18 C.F.R. § 35.37 (2025). *See also* Order No. 697, 119 FERC ¶ 61,295 at n. 216, PP 62, 298, 857; Order No. 816, 153 FERC ¶ 61,065 at P 39; *Data Collection for Analytics and Surveillance and Mkt.-Based Rate Purposes*, Order No. 860, 168 FERC ¶ 61,039, at P 6 (2019); *Refinements to Horizontal Market Power Analysis for Sellers in Certain Regional Transmission Organization and Independent System Operator Markets*, Order No. 861, 168 FERC ¶ 61,040, at PP 1-4 (2019).

[5] *See Open Access and Priority Rights on Interconnection Customer's Interconnection Facilities*, Order No. 807, 150 FERC ¶ 61,211, *order on reh'g*, Order No. 807-A, 153 FERC ¶ 61,047 (2015).

**Waivers, Authorizations, and Reporting Requirements**

Applicant's request for waiver of Subparts B and C of Part 35 of the Commission's regulations requiring the filing of cost-of-service information, except for sections 35.12(a), 35.13(b), 35.15 and 35.16 is granted. Applicant's request for waiver of Part 41 and Part 141 of the Commission's regulations concerning accounting and reporting requirements is granted with the exception of 18 C.F.R. § 141.15.[6] Applicant's request for waiver of Part 101 of the Commission's regulations is hereby granted, with the exception that waiver of the provisions of Part 101 that apply to hydropower licensees is not granted with respect to licensed hydropower projects.[7] Notwithstanding the waiver of the accounting and reporting requirements here, Applicant is expected to keep its accounting records in accordance with generally accepted accounting principles.

Applicant requests blanket authorization under Part 34 of the Commission's regulations for all future issuances of securities and assumptions of liability. Applicant is authorized to issue securities and assume obligations or liabilities as guarantor, indorser, surety, or otherwise in respect of any security of another person; provided that such issue or assumption is for some lawful object within the corporate purposes of Applicant, compatible with the public interest, and reasonably necessary or appropriate for such purposes.[8]

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[6] *See* Order No. 697, 119 FERC ¶ 61,295 at PP 984-985.

[7] Hydropower licensees are required to comply with the requirements of the Uniform System of Accounts pursuant to 18 C.F.R. Part 101 to the extent necessary to carry out their responsibilities under Part I of the Federal Power Act (FPA). We further note that a licensee's status as a market-based rate seller under Part II of the FPA does not exempt it from its accounting responsibilities as a licensee under Part I of the FPA. *See* Order No. 816, 153 FERC ¶ 61,065 at PP 345-350; *Seneca Gen., LLC,* 145 FERC ¶ 61,096, at P 23, n.20 (2013) (citing *Trafalgar Power, Inc.,* 87 FERC ¶ 61,207, at 61,798 (1999) (noting that "all licensees are required to comply with the requirements of the Uniform System of Accounts to the extent necessary to carry out their responsibilities under [s]ections 4(b), 10(d) and 14 of the FPA")).

[8] *See* Order No. 697, 119 FERC ¶ 61,295 at PP 999-1000.

Applicant must file Electric Quarterly Reports (EQRs) with the Commission, consistent with Order Nos. 2001[9] and 768.[10] Applicant must file EQRs electronically with the Commission consistent with the procedures set forth in Order No. 770.[11] Applicant further must timely report to the Commission any change in status that would reflect a departure from the characteristics the Commission relied upon in granting market-based rate authority, which may include the appointment of a non-independent director to a market-based rate seller's board (18 C.F.R. § 35.42).[12] Applicant must also comply with the requirements of Order Nos. 860 and 860-A, as well as the regulations promulgated pursuant to those rules.[13]

This action does not constitute approval of any service, rate, charge, classification, or any rule, regulation, or practice affecting such rate or service provided for in the filed documents; nor shall such action be deemed as recognition of any claimed contractual right or obligation affecting or relating to such service or rate; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by

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[9] *Revised Pub. Util. Filing Requirements,* Order No. 2001, 99 FERC ¶ 61,107, *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reh'g denied*, Order No. 2001-B, 100 FERC ¶ 61,342, *order directing filing*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), *order directing filing*, Order No. 2001-D, 102 FERC ¶ 61,334, *order refining filing requirements*, Order No. 2001-E, 105 FERC ¶ 61,352 (2003), *order on clarification*, Order No. 2001-F, 106 FERC ¶ 61,060 (2004), *order revising filing requirements*, Order No. 2001-G, 120 FERC ¶ 61,270, *order on reh'g and clarification*, Order No. 2001-H, 121 FERC ¶ 61,289 (2007), *order revising filing requirements*, Order No. 2001-I, 125 FERC ¶ 61,103 (2008).

[10] *Elec. Mkt. Transparency Provisions of Section 220 of the Fed. Power Act*, Order No. 768, 140 FERC ¶ 61,232 (2012), *order on reh'g*, Order No. 768-A, 143 FERC ¶ 61,054 (2013).

[11] *See Revisions to Elec. Quarterly Report Filing Process*, Order No. 770, 141 FERC ¶ 61,120, at P 3 (2012) (citing Order No. 2001, 99 FERC ¶ 61,107 at P 31).

[12] *See also Reporting Requirement for Changes in Status for Pub. Utils. with Market-Based Rate Auth.*, Order No. 652, 110 FERC ¶ 61,097, *order on reh'g*, Order No. 652-A, 111 FERC ¶ 61,413 (2005). *Evergy Kan. Cent., Inc.,* 181 FERC ¶ 61,044, at P 45 (2022); *order on reh'g*, 184 FERC ¶ 61,003, at PP 24-26; *Energy Prepay II, LLC*, 185 FERC ¶ 61,111 at P 39 (2023).

[13] Order No. 860, 168 FERC ¶ 61,039 (2019), *order on reh'g*, Order No. 860-A, 170 FERC ¶ 61,129 (2020).

the Commission in any proceeding now pending or hereafter instituted by or against Applicant.

This action is taken pursuant to the authority delegated to the Director, Division of Electric Power Regulation - West, under 18 C.F.R. § 375.307. This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R § 385.713.

Issued by: Amery S. Poré, Director, Division of Electric Power Regulation – West

Document Content(s)

**LIGHT ENERGY, LLC**

**PJM**
**APPLICATION FOR MEMBERSHIP**
**AND SCHEDULE 4**

# Application for Membership
between
PJM Interconnection, L.L.C.
and
Light Energy, LLC

This Application for Membership Agreement ('Agreement') is entered into between PJM Interconnection, L.L.C. ('PJM') and Light Energy, LLC ('Applicant'). The purpose of this Agreement is to apply to become a member of the PJM and to participate under the PJM Amended and Restated Operating Agreement, Third Revised Rates Schedule FERC No. 24 ('Operating Agreement'). The Applicant has read and understands the terms and conditions of the Operating Agreement. The Applicant agrees to accept the concepts and obligations set forth in this Agreement and the Operating Agreement posted on the PJM website at: http://www.pjm.com/documents/agreements/pjm-agreements.aspx.

The Applicant also commits to supply data required for coordination of planning and operating, including data for capacity accounting, and agrees to pay all costs and expenses in accordance with the Operating Agreement and all other applicable costs under the PJM Open Access Transmission Tariff ('Tariff'). Such costs include but are not limited to: (i) payment obligations under Schedule 3 of the Operating Agreement; (ii) costs under Schedule 9 of the PJM Tariff; and (iii) potential default allocation payment obligations pursuant to Section 15.2 of the Operating Agreement (PJM may, under the Operating Agreement, declare members in default for not paying their invoices. If that occurs, PJM may pursue collection of the overdue invoices that exceed the collateral PJM holds from the defaulting member as well as take steps to terminate the defaulting members' membership. According to the Operating Agreement, all members are required to pay a portion of the payment default that exceeds the defaulting member's collateral held by PJM.)

The Applicant will pay the annual fee of $5,000 for the remainder of the year of application upon notification of PJM application approval per Schedule 3.

The Applicant recognizes that it shall become a member of PJM effective as of the date that the Applicant receives the supplement to the Operating Agreement in the form prescribed in Schedule 4 of the Operating Agreement signed by the Applicant and countersigned by the President of PJM pursuant to section 11.6 of the Operating Agreement.

This Agreement will remain in effect until notice of termination is given in writing by the authorized representative of either the Applicant or PJM. Any financial obligations must be satisfied prior to termination of the Applicant's obligations and responsibilities under the PJM Agreement.

Applicant:

Signature: Adam Compain

Name: Adam Compain Title: Secretary Date: Jul 30, 2025

PJM Interconnection, L.L.C.

Signature:

Name: Jennifer Tribulski Title: Executive Director Date: May 27, 2026

**SCHEDULE 4**

**STANDARD FORM OF AGREEMENT TO BECOME A MEMBER OF THE LLC**

Any entity which wishes to become a Member of the LLC shall, pursuant to Section 11.6 of this Agreement, tender to the President an application, upon the acceptance of which it shall execute a supplement to this Agreement in the following form:

**Additional Member Agreement**

1. This Additional Member Agreement (the 'Supplemental Agreement'), dated as of 5/28/2026, is entered into among Light Energy, LLC and the President of the LLC acting on behalf of its Members.

2. Light Energy, LLC has demonstrated that it meets all of the qualifications required of a Member to the Operating Agreement. If expansion of the PJM Region is required to integrate Light Energy, LLC facilities, a copy of Attachment J from the PJM Tariff marked to show changes in the PJM Region boundaries is attached hereto. Light Energy, LLC agrees to pay for all required metering, telemetering and hardware and software appropriate for it to become a member.

3. Light Energy, LLC agrees to be bound by and accepts all the terms of the Operating Agreement as of the above date.

4. Light Energy, LLC hereby gives notice that the name and address of its initial representative to the Members Committee under the Operating Agreement shall be:
   Adam Compain
   801 Barton Springs Road
   Floor 9
   Austin, TX, 78704

5. The President of the LLC is authorized under the Operating Agreement to execute this Supplemental Agreement on behalf of the Members.

6. The Operating Agreement is hereby amended to include Light Energy, LLC, as a Member of the LLC thereto, effective as of May 28, 2026, the date the President of the LLC countersigned this Agreement.

IN WITNESS WHEREOF, Light Energy, LLC and the Members of the LLC have caused this Supplemental Agreement to be executed by their duly authorized representatives.

Members of the LLC

By: ______________________
Name: Asim Haque
Title: EVP, Governmental & Member Services

By: Adam Compain
Name: Adam Compain
Title: Secretary