

Scott H. DeBroff, Esq.

Phone: (717) 237-6716

Fax: (717) 260-4416

sdebroff@rhoads-sinon.com

RHOADS & SINON LLP

January 10, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. M-2013-2393141 – Public Utility Commission Bonding
Requirements for Electric Generation Suppliers; Acceptable Security Instruments**

Dear Secretary Chiavetta:

Enclosed herewith please find Plymouth Rock Energy's "Comments" to be entered into the above captioned proceeding.

Should you have any questions, please do not hesitate to contact me at (717) 237-6716.

Sincerely,

RHOADS & SINON LLP

By:


Scott H. DeBroff, Esq.

Enclosure

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
BONDING REQUIREMENTS FOR
ELECTRIC GENERATION
SUPPLIERS; ACCEPTABLE
SECURITY INSTRUMENTS

DOCKET NO. M-2013-2393141

COMMENTS ON BEHALF OF
PLYMOUTH ROCK ENERGY, LLC

AND NOW COMES, **Plymouth Rock Energy, LLC** ("Plymouth"), by and through its counsel, **Scott H. DeBroff, Esquire** of Rhoads & Sinon LLP, for the purpose of these "Comments" with respect to this proceeding before the Commonwealth of Pennsylvania Public Utility Commission ("PUC" or the "Commission"). In support of this docket, Plymouth avers the following:

1. On December 5, 2013, the Commission issued a Tentative Order seeking comment in this proceeding on whether the current level of security required for EGS operations after the initial year of service may be excessive, burdensome and a potential barrier to entry. The Commission also seeks comment on whether the types of acceptable security instruments should be expanded. Furthermore, the Commission seeks comments on whether these changes can be implemented prior to or without a change to their current regulations.

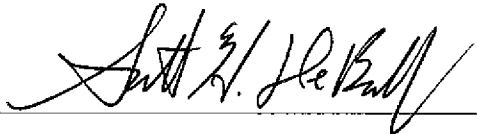
2. The following are Plymouth's comments to the December 5, 2013 Tentative Order.

**Comments on behalf of Plymouth Rock Energy
to the Commission's Tentative Order**

1. The Commission should include other acceptable forms of security such as a guarantee from a wholesale supplier with a long term agreement with the EGS, and one that is an investment grade company.
2. There should be a cap on the amount of security required, as this ties up cash and is costly to the EGS. This may hinder the EGS from expanding in the State.

WHEREFORE, Plymouth Rock Energy, LLC respectfully requests that the Pennsylvania Public Utility Commission consider its Comments in the above captioned response. We look forward to participating in the process going forward and contributing our experience and expertise.

Respectfully submitted,

By: _____

SCOTT H. DEBROFF, ESQUIRE
ATTORNEY ID No. 61170
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
P.O. BOX 1146
HARRISBURG, PA 17108-1146

TEL: (717) 237-6716
FAX: (717) 260-4416
EMAIL: SDEBROFF@RHOADS-SINON.COM

DATED: JANUARY 10, 2014

COUNSEL FOR PLYMOUTH ROCK ENERGY, LLC

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
BONDING REQUIREMENTS FOR
ELECTRIC GENERATION
SUPPLIERS; ACCEPTABLE
SECURITY INSTRUMENTS

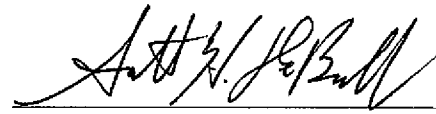
DOCKET NO. M-2013-2393141

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties, listed on the next page, in accordance with the requirements of §1.54 (relating to service by a party).

Dated: **January 10, 2014**

By:



SCOTT H. DeBROFF, ESQUIRE
ATTORNEY ID No. 61170
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
P.O. BOX 1146
HARRISBURG, PA 17108-1146

TEL: (717) 237-6716

FAX: (717) 260-4416

EMAIL: SDEBROFF@RHOADS-SINON.COM

COUNSEL FOR PLYMOUTH ROCK ENERGY, LLC

Certificate of Service – Docket No. M-2013-2393141

<p>ROSEMARY CHIAVETTA, SECRETARY PENNSYLVANIA PUBLIC UTILITY COMMISSION P.O. Box 3265 HARRISBURG, PA 17105-3265 (E-FILED)</p>	
---	--