

Sarah C. Stoner
717.237.6026
sstoncr@eckertseamans.com

September 11, 2020

Via FedEx

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor, Room-N201
Harrisburg, PA 17120

RECEIVED

SEP 11 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Secretary Chiavetta:

Direct Energy Services, LLC ("Direct Energy") 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, pursuant to the Secretarial Letter dated July 15, 2019. Direct Energy's current financial security reduction is effective until December 23, 2020. Direct Energy files this Annual Compliance Filing to renew its security at the reduced level of 5% based on its most recent twelve months of revenue.

Direct Energy provides the following information and documentation in support of its Annual Compliance Filing:

- 1) A spreadsheet of Direct Energy's gross receipts in Pennsylvania for the most-recent 12 months (August 2019 through July 2020) attached hereto as Appendix A (**CONFIDENTIAL**);
- 2) A copy of Direct Energy's confirmation from the Pennsylvania Department of Revenue that it has prepaid 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**); and
- 4) A Tax Status Letter from the Pennsylvania Department of Revenue to evidence that it is current with its tax liabilities to the Commonwealth, attached as Appendix D (**CONFIDENTIAL**).

Once we receive confirmation from Commission staff regarding the calculation of Direct Energy's reduced security amount, we will submit an original amendment to Direct Energy's letter of credit.

The Direct Energy contact person for this Annual Compliance Filing is as follows:

Andy Beauchamp
Regulatory Licensing and Reporting
12 Greenway Plaza, Suite 250
Houston, TX 77046
Tel. 713.877.3925
Email: Andy.Beauchamp@directenergy.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.

Please be advised that 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)

**Appendix A
Confidential**

RECEIVED

SEP 11 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Appendix B
Confidential**

RECEIVED

SEP 11 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Appendix C
Confidential**

RECEIVED

SEP 11 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix D
Confidential

RECEIVED

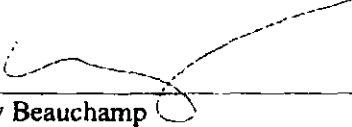
SEP 11 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

(L0794819.1)

VERIFICATION

I, Andy Beauchamp, state that I am a Regulatory Licensing and Reporting Analyst for Direct Energy. 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).



Andy Beauchamp
Regulatory Licensing & Reporting Analyst
Direct Energy

RECEIVED

SEP 11 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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
Commerce Building, Suite 202
300 North Second Street
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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED
SEP 11 2020

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

Dated: September 11, 2020

Sarah C. Stoner

Sarah C. Stoner, Esq.

ORIGIN ID:MDTA (717) 237-6000
SARAH STONER ESQ.
ECKERT SEAMANS CHERIN & MELLOTT
213 MARKET ST
8TH FLOOR
HARRISBURG, PA 17101
UNITED STATES US

SHIP DATE: 11SEP20
ACT WGT: 1.00 LB
CAD: 103210876/NET4280

BILL SENDER

TO ROSEMARY CHIAVETTA, SECRETARY

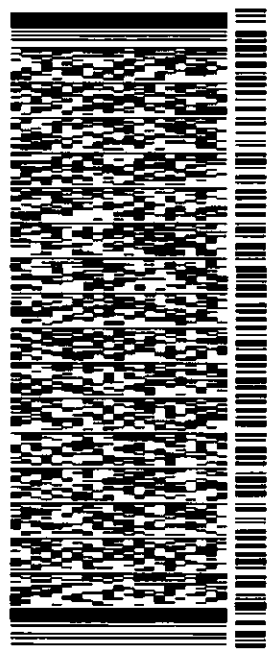
PUC HARRISBURG

2 FILE ROOM 400 NORTH ST

ROOM 201N

HARRISBURG PA 17120

(717) 711-7712 REF:30013530022
IN/ DEPT

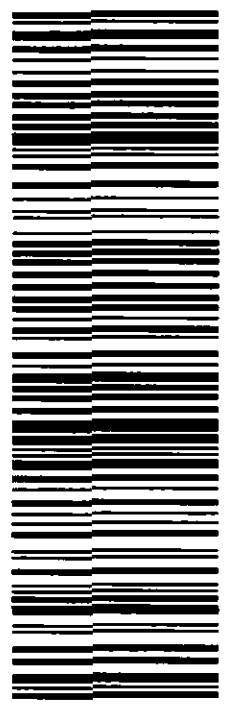


TRK# 7715 0872 3842
0201

MON - 14 SEP 10:30A
PRIORITY OVERNIGHT

16 MDTA

17120
PA-US MDT



56BJ6/1545/B766

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number. Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.