

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Talen Energy Marketing, LLC : Docket No. A-110098
To Reduce Its Bonding Requirement :

**PETITION OF TALEN ENERGY MARKETING, LLC
TO REDUCE ITS BONDING REQUIREMENT**

NOW COMES Talen Energy Marketing, LLC (“Talen”), by and through SVP, Regulatory and External Affairs Counsel, Debra Raggio, and files the instant Petition to Reduce its Bonding Requirement (“Petition”) and, in support thereof, avers as follows:

1. Talen is a licensed electric generation supplier (“EGS”) in the Commonwealth of Pennsylvania.
2. Talen has been a licensed EGS for more than one year. It was licensed on September 15, 1998 at Docket No. A-110098 and has maintained its license in good standing since that time.¹
3. Due to a timing error, Talen attempted to renew its 5% Bond Reduction at the time of the bond expiration. The renewal was denied because it was not timely filed. The Pennsylvania Public Utility Commission requested a new bonding amount of 10% by June 25, 2021. Talen will issue an increase rider to become compliant with the 10% requirement by June 25, 2021 if this petition is not granted by that time. The letter is attached as **Appendix A**.

¹ The license was issued to PPL EnergyPlus, LLC. On April 8, 2015, PPL EnergyPlus, LLC notified the Pennsylvania Public Utility Commission by letter that its name had changed to Talen Energy Marketing, LLC. The change was acknowledged and approved by Secretarial Letter dated July 8, 2015.

4. By Final Order entered July 24, 2014, the Pennsylvania Public Utility Commission (the “Commission”) held that an EGS, following its first year of operations, may petition to have its bonding requirement reduced from 10% to 5% of the EGS’s last 12 months of revenue or \$250,000, whichever is greater. *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments*, Docket No. M-2013-2393141, pp. 17-18, Conclusion and Ordering ¶ 5 (Order entered July 24, 2014) (the “Bond Reduction Order”).

5. Through this Petition, Talen seeks to maintain its reduced bonding requirement of 5% of its last 12 months of revenue.

6. As required by the Bond Reduction Order and pursuant to guidance from the Commission’s Bureau of Technical Utility Services, Talen has included as **Appendix B (CONFIDENTIAL)**, a spreadsheet that reports Talen’s gross receipts from electric generation sales to retail customers in Pennsylvania for the four most-recent quarters (as reflected on its Quarterly Gross Receipts Reports previously filed with the Commission).

7. Talen is current with its tax obligations to the Commonwealth of Pennsylvania. Talen, and has attached the Tax Status Letter as **Appendix C**.

8. Attached as **Appendix D** is Talen’s most recent REV-423 Specialty Tax Estimated Payment Form from the PA Department of Revenue stating the total amount of gross receipt taxes (GRT) the Licensee pre-paid toward the current calendar year.

9. Attached as **Appendix E** is an email from the AEPS coordinator regarding Talen’s AEPS compliance data.

10. Attached as **Appendix F** is an email confirming that Talen is compliant with all required annual and supplemental fees.

11. After approval of the reduction, Talen will make a compliance filing with the bond reflecting the reduced amount.

WHEREFORE, Talen Energy, Marketing LLC respectfully requests that this Honorable Commission, in accord with the Bond Reduction Order at Docket No. M-2013-2393141, grant the instant Petition and timely approve the reduction to the bonding requirements of Talen Energy Marketing, LLC.

Respectfully submitted,



Dated: June 2, 2021

Debra L. Raggio
SVP Regulatory & External Affairs Counsel
117 Oronoco Street
Alexandria, VA 22314
Telephone: 703-778-0841
Email: debra.raggio@talenergy.com

CERTIFICATE OF SERVICE
Docket No. A-110098

I hereby certify that I have this day served a true copy of Talen Energy Marketing, LLC's Petition to Reduce Its Bonding Requirements **without the Confidential appendix**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST CLASS MAIL:

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
P.O. Box 3265
Harrisburg, PA 17105-3265

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923

Office of Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101-1303

Pennsylvania Department of Revenue
Bureau of Compliance
Fourth and Walnut Streets
First Floor, Strawberry Square
Harrisburg, PA 17128-0001

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120-0001

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837-1276

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901-0138

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103-1380

Legal Department
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1139

UGI Utilities, Inc.
Attn: Rates Dept. - Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, Pa 19612-2677

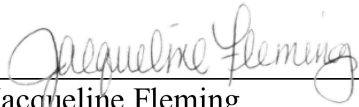
Duquesne Light
Regulatory Affairs
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219-1919

Met-Ed, Penelec, and Penn Power
Legal Department
FirstEnergy
2800 Pottsville Pike
Reading, PA 19605-2459

Pike County Light & Power Company
Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830-2152

West Penn Power d/b/a Allegheny Power
Legal Department
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Dated: June 3, 2021



Jacqueline Fleming
Regulatory & External Affairs Specialist

APPENDIX A



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, KEYSTONE BUILDING, SECOND FLOOR
HARRISBURG, PENNSYLVANIA 17120

IN REPLY PLEASE
REFER TO OUR FILE

May 26, 2021

Via Certified Mail

Julia R. Burnet
Rosenberg & Parker Surety
595 East Swedesford Road Suite 350
Wayne PA 19087

RE: Bond Continuation and Rider
Talen Energy Marketing LLC
Docket Number A-110098

Dear Ms. Burnet:

Please find under cover of this letter the financial instrument filed by Talen Energy Marketing LLC because it is not acceptable.

The Commission requires a supplier to file an original bond, letter of credit, continuation certificate, amendment, or other financial instrument as part of a supplier's licensing requirements under Section 2809(c) of the Pennsylvania Public Utility Code, including naming the Pennsylvania Public Utility Commission as the beneficiary or obligee of the security instrument along with all other required information on the document.

The Commission's regulations at 52 Pa. Code §54.40(d) require the security level, or bond amount, for each licensee to be 10% of the licensee's most recent reported 4 quarters of gross receipts, or 5% if a Bond Reduction was approved. As Talen Energy Marketing LLC's Annual Bond Reduction Compliance filing and Fixed-Term Bond expired on May 15, 2021, the bonding amount must be 10% of the most recent reported 4 quarters of gross receipts.

Please file the corrected, originally signed and sealed security instrument with my office within 30 days of the date of this letter, preferably by overnight delivery. If you are unable to meet this deadline due to the ongoing pandemic emergency of COVID-19, please email Secretary Rosemary Chiavetta at rchiavetta@pa.gov.

Sincerely,

Rosemary Chiavetta
Secretary of the Commission

Enclosures
RC:alw

CC: Jacqueline Fleming; Talen Energy Marketing LLC; 600 Hamilton Street Suite 600; Allentown PA, 18101
(Letter only by First Class Mail)

APPENDIX B

APPENDIX C

Bureau of Compliance
P.O. Box 280231
Harrisburg, PA 17128-0231
717-787-3911 (Option 5)
www.revenue.pa.gov



Monday, April 26, 2021

,
Attention: Jacqueline Fleming, Specialist

,
RE: Talen Marketing LLC
600 Hamilton Street
Suite 600
Allentown PA 18101

Federal EIN: 23-2974252
Social Security Number:
Business Partner Number: 1000355512

Dear Requester,

I am writing to confirm that the above-referenced tax accounts for Talen Marketing LLC are current. All returns have been filed with payment as of Monday, April 26, 2021. This confirmation is not intended to represent a "Bulk Sale Clearance" under the provision of section 1403 of the fiscal code. This letter does confirm that the account above is in good standing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ernard S. Robinson, Jr.', written in a cursive style.

Ernard S. Robinson, Jr
PA Department of Revenue
Bureau of Compliance
Business License Clearance Division

APPENDIX D

• Payment Successfully Submitted.

REV-423 Specialty Tax Estimated Payment

Business Name			Revenue ID	Federal Employer Identification Number
TALEN ENERGY MARKETING LLC			1000355512	23-2974252
Period Start Date	Period End Date	Period Due Date	Effective Date	Time Filed
1/1/2021	12/31/2021	3/15/2021	03/11/2021	3/10/2021 10:41:34 AM

Tax Type	Payment Amount
Gross Receipts - Electric, Hydro-Electric, & Water Power	15350695.00
	15350695.00

Filed By	Transaction ID	Tax Return Status
Madison Fraga	1321000001674726	Complete

Payment Method: ACH Debit (EFT) Payment Through e-TIDES

Return

APPENDIX E



PENNSYLVANIA ALTERNATIVE ENERGY CREDIT PROGRAM

Via Email to: Talen Energy Marketing, LLC (jacqueline.fleming@TalenEnergy.com, debra.raggio@talenenergy.com, RetailRenewables@talenenergy.com)

26 April, 2021

Dear Pennsylvania Electric Supplier:

This letter is to inform you that Talen Energy Marketing, LLC has met the non-solar Tier I, solar Tier I and Tier II AEC retirement requirements for energy year 2020.

If you have any questions regarding this letter please contact InClime, the Pennsylvania AEPS Administrator, at customerservice@pennaeps.com or by phone at 877-333-0573.

Best,

Pennsylvania AEPS Administration Team

APPENDIX F

From: [PC,PUCAssessments](#)
To: [Fleming, Jacqueline](#)
Subject: RE: [External] Talen Energy Marketing, LLC AEPS Compliance
Date: Monday, April 26, 2021 9:29:30 AM

[External Email]

Good morning,

Talen Energy Marketing LLC is current with regards to fiscal obligations and has no outstanding balance with the Commission at this time.

Thank you,
Cassi Pomeroy
Pennsylvania Public Utility Commission
Bureau of Administrative Services
Keystone Building
717-265-7548
pucassessments@pa.gov
www.puc.pa.gov

From: Fleming, Jacqueline <Jacqueline.Fleming@talenenergy.com>
Sent: Monday, April 26, 2021 7:43 AM
To: PC,PUCAssessments <RA-PCPUCASSESSMENTS@pa.gov>
Subject: [External] Talen Energy Marketing, LLC AEPS Compliance

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

Good Morning,

Talen Energy Marketing, LLC is renewing our bond reduction with the PA PUC. One of the requirements is proof that we are compliant with the Commission's required annual fees and supplemental annual fees. Can you please provide me confirmation of that? Please let me know if you have any questions.

Thank you,

JACQUELINE FLEMING

Regulatory & External Affairs Specialist | Talen Energy
jacqueline.fleming@TalenEnergy.com
Office: 610.601.0418 | Mobile: 570.730.1668

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