

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of *Richards Energy Group, Inc.*, d/b/a *Richards Energy Group, Inc.*, for approval to offer, render, furnish, or supply natural gas supply services as a(n) **Broker not taking title to the natural gas [as specified in item #4b below]** to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

- a. **IDENTITY OF THE APPLICANT:** Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:

Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
richardsenergy.com
717-898-6330

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

- b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

N/A.

- c. **REGULATORY CONTACT:** Provide the name, title, address, telephone number, fax number, and e-mail address of the person to whom questions about this Application should be addressed.

Tara Nordby, COO
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
tnordby@richardsenergy.com

- d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

Craig Doll, Esquire
25 W. Second Street
P.O. Box 403
Hummelstown, PA 17036
P: 717-566-9000
F: 717-566-9901
cdoll76342@aol.com

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** Provide the name, title, address, telephone number, fax number, and e-mail **OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED)** responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Natural Gas Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed NGSs.

*Tara Nordby, COO
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
tnordby@richardsenergy.com*

*Peter Richards, President
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
prichards@richardsenergy.com*

2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as ("d/b/a")
Provide a copy of the Applicant's filing with Pennsylvania's Department of State Pursuant to 54 Pa. C.S. §311.

Or

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**

(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)

The Applicant is a sole proprietor.
- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.

Or

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- * If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

Or

The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)*
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
- **See Appendix H: Richards Energy Group Articles of Incorporation**
- Give name and address of officers.

Frank Richards, CEO
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
frichards@richardsenergy.com

Peter Richards, President
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
prichards@richardsenergy.com

Mary Richards, Secretary and Treasurer
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
mrichards@richardsenergy.com



3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

- a. **AFFILIATES:** Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

Richards Energy Group, Inc. has no affiliates either in Pennsylvania or in any other state doing natural gas services

- b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

Richards Energy Group, Inc. has no predecessors either in Pennsylvania or in any other state doing natural gas services

4. OPERATIONS

a. **APPLICANT'S PRESENT OPERATIONS:** (select and complete the appropriate statement)

Definitions

- Supplier – an entity which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of an natural gas distribution company
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of natural gas but does not take title to the natural gas.

The Applicant is presently doing business in Pennsylvania as a

- natural gas interstate pipeline
- municipality providing service outside its municipal limits
- local gas distribution company
- retail supplier of natural gas services in the Commonwealth
- a natural gas producer
- a broker/marketer engaged in the business of supplying natural gas services

Other. (Identify the nature of service being rendered)

Richards Energy Group, Inc. is operating within Pennsylvania as a broker / marketer of electricity and electricity services under PA PUC license # A-110072

or

The Applicant is not presently doing business in Pennsylvania.

b. **APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a:

- Supplier or Aggregator of natural gas services
- Municipal supplier of natural gas services
- Cooperative supplier of natural gas services
- Broker/Marketer engaged in the business of supplying natural gas services
 - Check here to verify that your organization will not be taking title to the natural gas nor will you be making payments for customers.

Other (Describe):

c. **PROPOSED SERVICES:** Describe in detail the natural gas supply services which the Applicant proposes to offer.

Richards Energy Group, Inc. will recommend the acceptance of offers from Natural Gas Suppliers to our customers. We will not collect natural gas supply costs directly from our customers.

d. **PROPOSED SERVICE AREA:** Check the box of each Natural Gas Distribution Company for which the Applicant proposes to provide service.

- | | |
|---|--|
| <input type="checkbox"/> Columbia | <input type="checkbox"/> Philadelphia Gas Works |
| <input type="checkbox"/> National Fuel Gas | <input type="checkbox"/> UGI Central Penn |
| <input type="checkbox"/> PECO | <input type="checkbox"/> UGI Penn natural |
| <input type="checkbox"/> Peoples Gas – Equitable Div. | <input type="checkbox"/> UGI Utilities |
| <input type="checkbox"/> Peoples Natural Gas | <input type="checkbox"/> Valley Energy |
| <input type="checkbox"/> Peoples TWP | <input checked="" type="checkbox"/> All of the above |

e. **CUSTOMERS:** Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)***
- Residential and Small Commercial as Mixed Meter ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)
- Large Commercial Customers - (6,000 Mcf or more annually)***
- Industrial Customers***
- Governmental Customers***
- All of above (Except Mixed Meter)
- Other (Describe):

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.
ASAP

5. COMPLIANCE

- a. **CRIMINAL/CIVIL PROCEEDINGS:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.
Richards Energy Group, Inc. and all persons identified in this Application, has NOT been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such.

N/A

- b. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any such proceedings listed above.

N/A

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. If the Applicant has no actions or complaints to list, explicitly state such.

N/A

- d. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above.

N/A

6. PROOF OF SERVICE

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

(Example Certificate of Service is attached at Appendix C)

- a.) **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

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

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

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

- b.) **NGDCs:** Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Natural Gas Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each NGDC is as follows.

Columbia Gas of PA, Inc. Thomas C. Heckathorn 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.4996 FAX: 614.460.8426 theckathorn@nisource.com	
Peoples Natural Gas – Equitable Division Lynda Petrichevich 225 North Shore Drive Pittsburgh, PA 15212	National Fuel Gas Distribution Corp. David D. Wolford 6363 Main Street Williamsville, NY 14221

PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petricevich@peoples-gas.com	PH: 716.857.7483 FAX: 716.857.7479 e-mail: wolfordd@natfuel.com
The Peoples Natural Gas Company Lynda Petricevich 225 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petricevich@peoples-gas.com	PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com
Peoples TWP LLC (Formerly T. W. Phillips) Lynda Petricevich 225 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petricevich@peoples-gas.com	Philadelphia Gas Works Nicholas LaPergola 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.684.6278 email: nicholas.laperqola@pqworks.com
UGI Central Penn David Lahoff 2525 N. 12 th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com	UGI David Lahoff 2525 N. 12 th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com
Valley Energy Inc. Robert Crocker 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: bobc@ctenterprises.org	UGI Penn Natural David Lahoff 2525 N. 12 th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com

See Appendix C: Certificate of Service

7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require.

Each NGDC has indicated in writing that Richards Energy Group, Inc. will NOT be required to post a bond or other security as it will be operating in Pennsylvania as a natural gas broker/marketer only.

Please see Appendix E: Broker Letters

- b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:

- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.

N/A. Richards Energy Group, Inc. is a privately held company with no parent, affiliated or subsidiary companies

- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)

N/A. Richards Energy Group, Inc. is a privately held company

- Applicant's accounting statements, including balance sheet and income statements for the past two years.

Please see Appendix F: Financial Information

- Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports.

Please see Appendix F: Financial Information

- A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee.

Richards Energy Group, Inc. holds the following policies:

Commercial General Liability	\$1,000,000 each occurrence \$2,000,000 aggregate
Automobile Liability	\$1,000,000
Umbrella Liability	\$2,000,000 each occurrence \$2,000,000 aggregate
Professional Liability	\$1,000,000 each occurrence \$1,000,000 aggregate

Please see Appendix F: Financial Information to view the Certificate of Liability Insurance

- Audited financial statements exhibiting accounts over a minimum two year period.

Please see Appendix F: Financial Information

- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

Please see Appendix F: Financial Information

c. **SUPPLIER FUNDING METHOD:** If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.
N/A. Richards Energy Group, Inc. is operating as Broker/Marketer only

d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.
Fees will be collected from NG Suppler

e. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

*Stephanie Baylor
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
sbaylor@richardsenergy.com*

f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application.

All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

Please see Appendix D: Tax Certification Statement

8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by natural gas distribution companies does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

a. EXPERIENCE, PLAN, STRUCTURE: such information may include:

- Applicant's previous experience in the natural gas industry.
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

General description of the firm:

Richards Energy Group is an independent, local and family-owned energy consulting firm. The company currently provides professional energy cost management services to over 450 municipal, industrial, commercial and institutional clients throughout Pennsylvania.

Years in business:

Richards Energy Group, Inc. has been in business for over 21 years. Key dates include:

- April 1, 1995 *Founded*
- January 14, 1999 *PA PUC license # A-110072 granted*
- December 26, 2002 *Incorporated*

Current Client Base

Richards Energy Group Inc. manages \$80,000,000 of electric bills each year across over 450 clients. The lighting retrofits division has reduced clients' consumption by 18,000,000 kwh/year, or \$1,500,000/year.

Services offered:

Richards Energy Group, Inc. offers a multitude of services to help customers manage energy costs.

- *Electricity Procurement – single-channel access to all available competitive market options, with impartial evaluation of best-fit contract offers via RFP bid*
- *Natural Gas & Fuels Procurement – an expansion of Richards Energy's purchasing management made available due to customer request*
- *Energy Efficient Lighting – turn-key capabilities from on-site walk-throughs, to customized retrofit proposals, payback analysis, installation, project management, materials recycling, rebate management, positive cash-flow options, and even combination procurement/lighting contracts*
- *Third Party Energy & Utility Consultation – negotiating utility contracts, rate structure analysis, electrical infrastructure, and general utility issues*

- Demand Response – managing curtailment services that generate monthly revenues to customers
- Energy Bill Auditing – routine review of billing charges for accuracy, pursuing refunds and credits to resolve overcharges from both the utility and supplier
- Sales Tax Exemption Studies – determining proper tax exemptions, preparing defensible documentation for state of PA, and securing refunds and ongoing savings
- Energy Efficiency Audits - performing walk-through facility audits to identify energy cost reduction opportunities and efficiency improvements
- Real-Time Metering – offering sub-metering applications, and utility meter verification

Number of Employees:

Richards Energy Group, Inc. maintains a staff of 15, including energy professionals holding a variety of certifications (PE, CEM, CEP, CEA, BEP, CSDM, etc.) and averaging over 11 years of energy experience each.

Organization and Management:

Below is a narrative description of the staffing structure of Richards Energy Group, Inc. Resumes for key employees are included in Appendix I

Personnel	Major Responsibilities
CEO Frank J. Richards, BSEE PE, CEP	<ul style="list-style-type: none"> • Owner & Chief Executive • Management Leadership • Engineering oversight
President Peter Richards, BSME EIT, CEM, CEA, BEP, CSDP	<ul style="list-style-type: none"> • Owner & President • Leadership Team Oversight • Chief Technology Officer • Chief Visionary Officer • Lighting Division – Development & Oversight • Demand Response- Development & Oversight • Customer Service Escalations • Key Account Management
Vice President, Operations & COO Tara Quigley, BSME EIT, CEP	<ul style="list-style-type: none"> • Leadership Team • Operational Oversight • Business Development • Customer Service Escalations
Vice President, Key Accounts Mike Frey, BS Economics & Finance CEP	<ul style="list-style-type: none"> • Leadership Team • Electricity Procurement Division – Development & Oversight • Electric Supplier Relations • Business Development • Key Account Management
Senior Engineer John Segletes, BSME CEM, CRM	<ul style="list-style-type: none"> • Energy Auditing • Sales Tax Exemption Consulting • Energy Consulting and Modeling • Mechanical Code Review and Design
Consulting & Fuels Don Hornung, BA Biology CEM, CEP, CEA	<ul style="list-style-type: none"> • Natural Gas & Fuels Division –Development & Oversight

Personnel	Major Responsibilities
	<ul style="list-style-type: none"> • Natural Gas Supplier Relations • General Utility Consulting • Sales Tax Exemption Specialist • Energy Audits • Environmental Regulatory • Key Account Management
Senior Analyst, Fuels Steve Hornung	<ul style="list-style-type: none"> • Electricity Procurement • Natural Gas Procurement • Utility Tariff Analysis
Procurement & Office Mgr. Stephanie Baylor	<ul style="list-style-type: none"> • Electricity Procurement Division –Contract Execution & Oversight • Administrative Oversight • Bookkeeping & HR • Office Management
Senior Analyst, Electricity Procurement Julia Smith, MS Biology CEP	<ul style="list-style-type: none"> • Electricity Procurement Division – Contract Execution & Analysis • Onsite Generation Analyst (including solar and renewables and impact on supply contracts) • Account Management
Account Manager II, Electricity Procurement Linda Ulmer	<ul style="list-style-type: none"> • Electricity Procurement Division – Contract Execution & Analysis • Account Management
Senior Engineer, Business Development Lisa Treible, BSEE	<ul style="list-style-type: none"> • Electricity Procurement Division – Sales & Consulting • Natural Gas Procurement – Sales & Consulting • Certified Industrial Gas Consultant • Account Management
Senior Lighting Coordinator Andrew Fritz, BA Economics	<ul style="list-style-type: none"> • Lighting Division – Project Analysis, Execution & Management • Lighting Vendor Relations • New Lighting Technologies • Account Management
Contract Administrator Mellissa Spradley	<ul style="list-style-type: none"> • Electricity Procurement Division – Administrative Support • Contract Administrator • Energy Bill Auditing • Collect and Analyze Utility & Supplier Data
Jeff Good Business Development	<ul style="list-style-type: none"> • Customer Liaison • Business Development
Kevin Pratte Business Development	<ul style="list-style-type: none"> • Customer Liaison • Business Development

b. PROPOSED MARKETING METHOD (check all that apply)

- Internal – Applicant will use its own internal resources/employees for marketing
 External NGS – Applicant will contract with a **PUC LICENSED NGS**

- Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
- External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or non-selling marketer**
- Other (Describe):

c. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

Richards Energy Group, Inc. will conduct a quarterly review of marketing activities to ensure all marketing is performed in an ethical manner for employees and subcontractors. This includes, but will not be limited to:

- *Not engaging in misleading or deceptive conduct*
- *Making false or misleading statements regarding rates and savings offered by suppliers*
- *Providing accurate and timely information about services and products being offered*
- *Ensuring that products being offered by a supplier contain information, verbally or written, in plain language designed to be understood by the customer.*

e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience.

Frank Richards, CEO
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
frichards@richardsenergy.com

Peter Richards, President
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330

F: 717-898-6331
prichards@richardsenergy.com

Tara Nordby, COO and Vice President, Operations
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
tnordby@richardsenergy.com

Mike Frey, Vice President, Key Accounts
Richards Energy Group, Inc.
781 S. Chiques Rd
Manheim, PA 17545
P: 717-898-6330
F: 717-898-6331
mfrey@richardsenergy.com

9. DISCLOSURE STATEMENT:

(Not applicable for an applicant applying for a license exclusively as a broker/marketer.)

DISCLOSURE STATEMENTS: If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.

N/A. Richards Energy Group, Inc. is operating as Broker/Marketer only

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **STANDARDS OF CONDUCT AND DISCLOSURE:** As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 62.114.
 AGREED
- b. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission:
- Reports of Gross Receipts: Applicant shall file an annual report with the Commission on an annual basis no later than April 30th following the end of the calendar year per 52 Pa. Code § 62.110.
 AGREED
- c. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. § 2208(d). Transferee will be required to file the appropriate licensing application.
 AGREED
- d. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling natural gas in the Commonwealth of PA, and a supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.
 ACKNOWLEDGED
- e. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 62.105.
 AGREED
- f. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.
 AGREED
- g. **NOTIFICATION OF CHANGE:** If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.
 AGREED

h. CEASING OF OPERATIONS: Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.

AGREED

i. FILING FEE: The Applicant has enclosed or paid the required, non-refundable filing fee by CERTIFIED CHECK OR MONEY ORDER in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. The Commission does not accept corporate or personal checks for filing fees.

PAYMENT ENCLOSED

11. AFFIDAVITS

(All affidavits must be notarized before filing.)

- a.) **APPLICATION AFFIDAVIT:** Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.
See Appendix A: Application Affidavit for a completed and officially notarized form.

- b.) **OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the Public Utility Code of Pennsylvania and applicable federal and state laws. An example copy of this Affidavit can be found at Appendix B.
See Appendix B: Operations Affidavit for a completed and officially notarized form.

12. NEWSPAPER PUBLICATIONS

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.

The chart below dictates which newspapers are necessary for each NGDC. For example, an applicant that wants to operate in Peoples – Equitable would need to run ads in both The Erie Times-News and the Pittsburgh Post-Gazette. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and must be supplied with this application. Applicants do not need a docket number in their publication. Docket numbers will be issued when all criteria on the item 14 checklist (see below) are satisfied.

Richards Energy Group, Inc, has published a notice of filing this application in newspapers of general circulation covering each county in Pennsylvania. See Appendix G: Proof of Publication

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Columbia Gas	X	X		X		X	X
National Fuel Gas				X			
PECO			X				
Peoples - Equitable	X			X			
Peoples Natural Gas	X			X			X
Peoples TWP LLC				X			
Philadelphia Gas Works			X				
UGI		X	X		X		
UGI Central Penn	X	X	X	X	X	X	X
UGI Penn Natural		X			X	X	
Valley Energy					X	X	
Entire Commonwealth	X	X	X	X	X	X	X

(Example Publications are provided at Appendices F and G)

13. SIGNATURE

Applicant: Richards Energy Group, Inc.
By: Tara E Nordby
Title: Tara E Nordby, COO

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

14. CHECKLIST

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections is complete.

Applicant: *Richards Energy Group, Inc.*

Applicant's Use	<i>SR</i>	Signature	
	<i>SR</i>	Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)	
	<i>SR</i>	Application Affidavit	
	<i>SR</i>	Operations Affidavit	
	<i>SR</i>	Proof of Publication	
	<i>SR</i>	Tax Certification Statement	
		Commonwealth Department of State Verification	
	<i>SR</i>	Certificate of Service	

PUC Secretary's Bureau Use

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix A:

Application Affidavit

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix A

APPLICATION AFFIDAVIT

RECEIVED

[Commonwealth/State] of Pennsylvania

JUL 21 2016

ss. PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

County of Lancaster

Tara Nordby, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Chief Operating Officer (Office of Affiant) of Richards Energy Group, Inc. (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein Richards Energy Group, Inc., has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein Richards Energy Group, Inc., has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein Richards Energy Group, Inc., acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein Richards Energy Group, Inc., acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

Tara Nordby
Signature of Affiant

Sworn and subscribed before me this 29th day of June, 2016.

Claudia D. Diaz-Buitrago
Signature of official administering oath

My commission expires 10-10-2017

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
CLAUDIA D. DIAZ-BUITRAGO, Notary Public
City of Lancaster, Lancaster County
My Commission Expires Oct. 10, 2017

Appendix B: Operations Affidavit

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix B

RECEIVED

OPERATIONS AFFIDAVIT

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

[Commonwealth/State] of Pennsylvania:

: ss.

County of Lancaster :

Tara Nordby, Affiant, being duly [sworn/affirmed] according to law,
deposes and says that:

[He/she is the Chief Operating Officer (Office of Affiant) of Richards Energy Group
(Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Richards Energy Group, Inc., the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That Richards Energy Group, Inc., the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That Richards Energy Group, Inc., the Applicant herein, certifies to the Commission that it is subject to, will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 22 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28 shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional natural gas sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That Richards Energy Group, Inc., the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 and the standards and billing practices of 52 PA. Code Chapter 56.

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



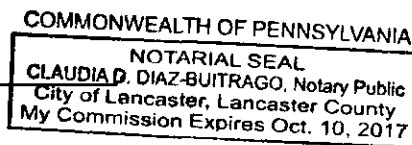
Signature of Affiant

Sworn and subscribed before me this 29th day of June, 20 16.



Signature of official administering oath

My commission expires 10-10-2017



Appendix D: Tax Certification

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix E:

Broker letters

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

March 21, 2016

Tara Nordby
Richards Energy Group, Inc.
781 S. Chiques Rd.
Manheim, PA 17545

Dear Tara Nordby:

We are pleased that Richards Energy Group, Inc. has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Richards Energy Group, Inc. could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. Richards Energy Group, Inc. has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Richards Energy Group, Inc. does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to Richards Energy Group, Inc. changes in the future, Columbia Gas might deem it appropriate to require Richards Energy Group, Inc. to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-6841 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,



Michele Caddell
Manager of Choice and Transportation Support Services



PEOPLES NATURAL GAS



PEOPLES TWP

225 North Shore Drive
Pittsburgh, PA 15212

Lynda W. Petrichevich
Director, Rates and Regulatory Affairs

Peoples Service Company LLC
Phone: 412-208-6528; Fax: 412-208-6577
Email: lpetrichevich@peoples-gas.com

June 21, 2016

Tara Nordby
Vice President, Operations and COO
Richards Energy Group, Inc.
781 S. Chiques Road
Manheim, PA 17545

Dear Ms. Nordby:

We are pleased that Richards Energy Group, Inc. has applied for a license to provide natural gas services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, Peoples TWP, and Peoples Natural Gas LLC – Equitable Division (“the Companies”).

Since Richards Energy Group, Inc. is not currently operating a Pool on the Peoples systems, we have determined at this time that Richards Energy Group, Inc. does not need a bond or other financial security requirement to provide these services to the Company’s customers.

If a Pool is established which alters the creditworthiness requirement or the Company’s exposure to Richards Energy Group, Inc. provision of services on the Peoples’ system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

If you have any questions feel free to contact me at 412-208-6528 or by email at Lynda.W.Petrichevich@peoples-gas.com.

Sincerely,

Lynda W. Petrichevich
Director – Rates and Regulatory Affairs
Peoples Natural Gas Company LLC

Cc: Steven Kolich
Stephen Kelly



An Exelon Company

July 5, 2016

Tara Nordby CEP
Vice President, Operations and COO
Richards Energy Group, Inc.
781 S. Chiques Road, Manheim, PA 17545

Re: Bonding Requirements

PECO is aware that the Richards Energy Group, Inc. has applied for a license to provide brokering and consulting services to commercial and industrial customers on the distribution system of PECO.

In making such an application, the Richards Energy Group, Inc. could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. The Richards Energy Group, Inc. has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers will not take title to any delivered natural gas; nor will accept any customer payments or deposits. Therefore, PECO has determined at this time that The Richards Energy Group, Inc. does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by the Richards Energy Group, Inc. or the creditworthiness requirement for PECO's exposure to the Richards Energy Group, Inc. changes in the future, PECO reserves the right to require the Richards Energy Group, Inc. to provide a bond or other financial security instrument.

If you should have any questions regarding this matter, please contact Chris Sauerbaum at 215-841-6422 or myself at 215-841-6452.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carlos P. Thillet".

Carlos P. Thillet
Manager, Gas Supply and Transportation
2301 Market St S9-1
Philadelphia, Pa 19103



PHILADELPHIA GAS WORKS
800 West Montgomery Avenue • Philadelphia, PA 19122

June 20, 2016

Ms. Tara Nordby, Vice President
Operations & COO
Richards Energy Group, Inc.
781 S. Chiques Road
Manheim, PA 17545

RE: Security Requirement Bond – Broker

Dear Ms. Nordby:

Philadelphia Gas Works ("PGW") is aware that Richards Energy Group, Inc. has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works.

As you know, in making such an application, Richards Energy Group, Inc. must furnish acceptable security to each utility where Richards Energy Group, Inc. will do business. As such, under its tariff, Philadelphia Gas Works could require Richards Energy Group, Inc. to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate.

However, you have indicated, and it is Philadelphia Gas Works' understanding that Richards Energy Group, Inc. only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, Richards Energy Group, Inc. will never take title to any delivered natural gas.

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Richards Energy Group, Inc. does not need to post a bond or other form of security to operate in its service territory. If the services provided by Richards Energy Group, Inc. should change, Philadelphia Gas Works reserves the right to require security from Richards Energy Group, Inc. as it deems appropriate.

If you have any questions concerning the foregoing, please contact me at (215) 684-6278.

Sincerely,

Nicholas LaPergola

Director

Gas Supply, Transportation & Control



UGI Utilities, Inc.
2525 North 12th Street
Suite 360
Post Office Box 12677
Reading, PA 19612-2677

July 12, 2016

Tara Nordby CEP
Vice President, Operations and COO
Richards Energy Group, Inc.
781 S. Chiques Road, Manheim, PA 17545

RE Richards Energy Group, Inc. Broker application

Dear Ms. Nordby,

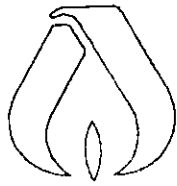
Based on your assertion that Richards Energy Group, Inc. , ("RICHARDS ENERGY") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities Inc. ("UGIU") has concluded that RICHARDS ENERGY will not need to post security with UGI-Central Penn Gas ("CPG"), UGI-Penn Natural Gas ("PNG") or UGI Utilities Gas Division ("UGI"). This is based on the declaration that RICHARDS ENERGY will not be taking title to gas or directly serving end use customers. This also assumes that RICHARDS ENERGY will be acting in conjunction with a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the respective UGIU tariffs.

If RICHARDS ENERGY wishes to directly serve Choice customers in the service territories of UGI, PNG and/or CPG in the future as a natural gas supplier, it will have to post security as specified in the respective UGI tariffs prior to the commencement of the service.

Please feel free to contact me with any additional questions that you may have.

Sincerely,

David E. Lahoff
Manager, Tariff & Supplier Administration
UGI Utilities, Inc.



VALLEY ENERGY

523 S. Keystone Avenue, P.O. Box 340, Sayre, PA 18840
800/998-4427 • 570/888-9664 • FAX 570/888-6199

June 27, 2016

VIA EMAIL

Tara Nordby, CEP
Vice President, Operations and COO
Richards Energy Group, Inc.
781 S. Chiques Rd.
Manheim, PA 17545
tnordby@richardsenergy.com

Dear Ms. Nordby:

We understand that Richards Energy Group, Inc. has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania including our company's service area.

Because Richards Energy Group, Inc. intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Richards Energy Group, Inc. will not be required to post a bond or other form of financial security instrument to provide these services in our service area. However, if the services provided change in the future, we reserve the right to require security from Richards Energy Group, Inc. as deemed appropriate.

If you have any questions, please contact Mrs. Marjorie Johnston at 570-888-9664.

Sincerely,

Robert J. Crocker
President & CEO

RJC/ss

cc: M. Johnston, Valley Energy

Appendix G: Proof of Publication

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

Richards Energy Group
781 Chiques Road
Manheim PA 17545

REFERENCE: 88524 176120
PUC NOTICE

STATE OF PENNSYLVANIA)
COUNTY OF ERIE) SS:

Debra McGraw, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, a true and correct copy of which is attached, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 12/18/15

TOTAL COST: \$409.00 AD SPACE: 0 Lines

FILED ON: 12/18/15

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE

Application of Richard's Energy Group For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services. To The Public In The Commonwealth Of Pennsylvania

Richard's Energy Group will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas services as a broker/marketer engaged in the business of providing natural gas services. Richard's Energy Group proposes to sell natural gas and related services in Columbia Gas, Equitable Gas, Peoples Natural Gas, UGI Central Penn., and the Entire Commonwealth.

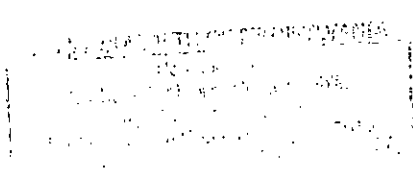
The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Richard's Energy Group may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to Richard's Energy Group attorney at the address listed below.

By and through Counsel: Craig Doll, Esquire
Richards Energy Group, Inc.
781 S. Chiques Road
Manheim, PA 17545
Phone: (717) 898-6330
FAX: (717) 898-6331

Sworn to and subscribed before me this 18th day of December 2015

Affiant: Debra McGraw

NOTARY: [Signature]



The Patriot-News Co.
2020 Technology Pkwy
Suite 300
Mechanicsburg, PA 17050
Inquiries - 717-255-8213

The Patriot-News
Now you know

RICHARDS ENERGY GROUP
781 S CHIQUES RD

RECEIVED

JUL 21 2016

MANHEIM PA 17545

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

THE PATRIOT NEWS
THE SUNDAY PATRIOT NEWS

Proof of Publication

Under Act No. 587, Approved May 16, 1929
Commonwealth of Pennsylvania, County of Dauphin} ss

Amy Kotula, being duly sworn according to law, deposes and says:

That she is a Staff Accountant of The Patriot News Co., a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal office and place of business at 2020 Technology Pkwy, Suite 300, in the Township of Hampden, County of Cumberland, State of Pennsylvania, owner and publisher of The Patriot-News and The Sunday Patriot-News newspapers of general circulation, printed and published at 1900 Patriot Drive, in the City, County and State aforesaid; that The Patriot-News and The Sunday Patriot-News were established March 4th, 1854, and September 18th, 1949, respectively, and all have been continuously published ever since;

That the printed notice or publication which is securely attached hereto is exactly as printed and published in their regular daily and/or Sunday/ Community Weekly editions which appeared on the date(s) indicated below. That neither she nor said Company is interested in the subject matter of said printed notice or advertising, and that all of the allegations of this statement as to the time, place and character of publication are true; and

That she has personal knowledge of the facts aforesaid and is duly authorized and empowered to verify this statement on behalf of The Patriot-News Co. aforesaid by virtue and pursuant to a resolution unanimously passed and adopted severally by the stockholders and board of directors of the said Company and subsequently duly recorded in the office for the Recording of Deeds in and for said County of Dauphin in Miscellaneous Book: "M", Volume 14, Page 317.

PUBLICATION COPY

This ad # 0002352984 ran on the dates shown below:

December 17, 2015

Amy Kotula

Sworn to and subscribed before me this 22 day of December, 2015 A.D.

Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Sheryl Marie Leggare, Notary Public
Hampden Twp., Cumberland County
My Commission Expires July 16, 2013
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

Application of Richard's Energy Group, Inc. for approval to Order, Render, and Furnish Natural Gas Services as a Public Utility is being filed in the name of Applying Natural Gas Utility Services, To The Public in the Commonwealth of Pennsylvania. Richard's Energy Group will be filing a petition with the Pennsylvania Public Utility Commission ("PUC") for license to provide natural gas service as a broker/interceptor engaged in the business of providing public utility services. Richard's Energy Group proposes to sell natural gas and related services in Columbia Gas' UGI, UGI

Central Penn. UGI Penn Natural Gas the Entire Commonwealth. The PUC may consider this application without a hearing. Any objection to the technical or financial fitness of Richard's Energy Group must be filed within 15 days of the date of this notice with the Secretary of the PUC, P. O. Box 1265, Harrisburg, PA 17103-1265. You should send copies of any protest to Richard's Energy Group, attention of the address listed below. By and through Counsel, Craig Paul, Esquire, Richard's Energy Group, Inc., 737 S. Chester Road, Mechanicsburg, PA 17045, Phone: (717) 890-4199, FAX: (717) 890-4551.

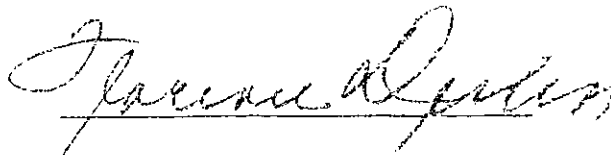
Proof of Publication in The Philadelphia Daily News
Under Act. No 587, Approved May 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

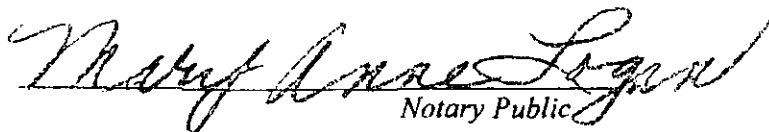
Florence Devlin being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said newspaper on the following dates:

December 17, 2015

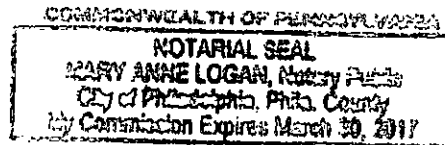
Alliant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.



Sworn to and subscribed before me this 17th day of
December, 2015.


Notary Public

My Commission Expires:



Copy of Notice of Publication

RECEIVED
PUBLIC UTILITY COMMISSION NOTICE
Application of Richard's Energy Group For approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker, Engaged in The Business Of Supplying Natural Gas Supply Services To The Public In The Commonwealth Of Pennsylvania.
Richard's Energy Group will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas services as a broker/marketer engaged in the business of providing natural gas services. Richard's Energy Group proposes to sell natural gas and related services in PECC, Philadelphia Gas Works, UGI, UGI Central Penn, and the entire Commonwealth.
The PUC may consider this application without a hearing. Parties interested in the technical or financial aspects of Richard's Energy Group may file their written comments on the date of this notice with the Secretary of the PUC, P.O. Box 2260, Harrisburg, Pa 17103-2260. You should also file a copy of your comments with Richard's Energy Group at the above address listed below.
By: Andrew Edmunds, Group Sales Executive
Richard's Energy Group, Inc.
100 N. 5th Street
Harrisburg, Pa 17101
Phone (717) 300-8200
FAX (717) 300-9321

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss P. Reed, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

12 of January, 2016

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

P. Reed
PG Publishing Company
Sworn to and subscribed before me this day of:
January 12, 2016

Lincoln E. Gaebler
COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Lincoln E. Gaebler, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Jan. 31, 2019
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

STATEMENT OF ADVERTISING COSTS
Richard's Energy Group
781 S. Chiques Road
MANHEIM PA 17545

To PG Publishing Company

Total ----- \$397.50

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office
34 Boulevard of the Allies
PITTSBURGH, PA 15222
Phone 412-263-1333

PG Publishing Company, a Corporation, Publisher of
Pittsburgh Post-Gazette, a Newspaper of General Circulation
By _____

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

COPY OF NOTICE OR PUBLICATION

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
Application of Richard's Energy Group For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.
Richard's Energy Group will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas services as a broker/marketer engaged in the business of providing natural gas services. Richard's Energy Group proposes to sell natural gas and related services in Columbia Gas, Equitable Gas, National Fuel Gas, Peoples Natural Gas, People's TWP LLC, DGI Central Penn, and the entire Commonwealth.
The PUC may consider this application without a hearing. Protests directed to the technical or financial soundness of Richard's Energy Group may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to Richard's Energy Group attorney at the address listed below.
By and through Counsel Craig Dull, Esquire, Richard's Energy Group, Inc., 781 S. Chiques Road, Manheim, PA 17545, Phone: 717-296-6100, FAX 717-296-6331

The Scranton Times (Under act P.L. 877 No 160, July 9, 1976)
Commonwealth of Pennsylvania, County of Lackawanna

RICHARDS ENERGY GROUP INC
MELISSA SPRADLEY
781 S CHIQUES ROAD MANHEIM PA 17545

Account # 614070
Order # 81873011
Ad Price: 206.20

RECEIVED

JUL 21 2016

LEGAL NOTICE PENNSYLVANIA

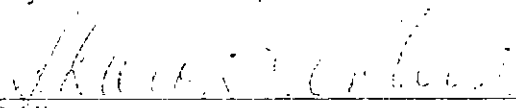
Gina Krushinski

Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

12/16/2015

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true _____

Sworn and subscribed to before me
this 16th day of December A.D., 2015



(Notary Public)

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

LEGAL NOTICE

PENNSYLVANIA PUBLIC UTILITY
COMMISSION NOTICE

Application of *Richard's Energy Group* For Approval To Offer, Render or Furnish Natural Gas Services as a Broker/Marketer Engaged in The Business Of Supplying Natural Gas Supply Services, To The Public in The Commonwealth Of Pennsylvania.

Richard's Energy Group will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas services as a broker/marketer engaged in the business of providing natural gas services. *Richard's Energy Group* proposes to sell natural gas and related services in UGI, UGI Central Penn, HGI Penn Natural, Valley Energy, and the Entire Commonwealth.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of *Richard's Energy Group* may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to *Richard's Energy Group* attorney at the address listed below.

By and through Counsel:
Craig Doll, Esquire
Richards Energy Group, Inc.
791 S. Chiques Road
Manheim, PA 17545
Phone: (717) 898-6330
FAX: (717) 898-6331

PROOF OF PUBLICATION OF NOTICE IN THE WILLIAMSPORT SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF LYCOMING

SS:

Bernard A. Oravec Publisher of the Sun-Gazette Company, publishers of the Williamsport, Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport Sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

December 30, 2015

6870-668-008
800-399-0289
1551 (270)

Affiant further c
to verify the fore
of publication, ar

Application of Richard's Energy Group For Approval To Operate, Handle, or Furnish Natural Gas Services as a Marketing Service Engaged in The Business Of Supplying Natural Gas Supply Services To The Public In The Commonwealth Of Pennsylvania.

Richard's Energy Group will be filing an application with the Pennsylvania Public Utility Commission (PUC) for a license to provide natural gas services. Richard's Energy Group proposes to sell natural gas and related services in Columbia Gas, UGI Central Penn, UGI Penn Natural, Valley Energy and the entire Commonwealth.

The PUC may consider this application without a hearing. Protests directed to the technical or financial issues of Richard's Energy Group may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17103-2265. You should send copies of any protest to Richard's Energy Group attorney at the address listed below

By and through Counsel:
Craig Doll, Esquire
Richard's Energy Group, Inc.
701 S. Chilques Road
Mentheim, PA 17545
Phone: (717) 898-6330
FAX: (717) 898-6331

officer daily authorized by the Sun-Gazette Company, publisher of the Williamsport Sun-Gazette, oath and also declares that affiant is not interested in the subject matter of the aforesaid notice and that the facts in the foregoing statement as to time, place and character of publication are true.

Bernard A. Oravec

SUN-GAZETTE COMPANY

Sworn to and subscribed before me

the 30th day of December, 2015

Notary Public

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette Company, Dr.:	
For publishing the notice attached	
hereto on the above state dates.....	\$ 240.00
Probated same.....	\$
Total.....	\$ 240.00

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE SUN-GAZETTE COMPANY hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

RECEIVED

SUN-GAZETTE COMPANY

BY Bernard A. Oravec

JUL 21 2016

COMMONWEALTH OF PENNSYLVANIA }
 County of Cambria } SS

PENNSYLVANIA
 PUBLIC UTILITY
 COMMISSION
 NOTICE

Application of Richard's Energy Group For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged in The Business of Supplying Natural Gas Supply Services To The Public in The Commonwealth Of Pennsylvania.

Richard's Energy Group will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas services as a broker/marketor engaged in the business of providing natural gas services.

Richard's Energy Group proposes to sell natural gas and related services in Columbia Gas, People's Natural Gas, UGI Central Penn., and the Entire Commonwealth.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Richard's Energy Group may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3245, Harrisburg, PA 17105-3245. You should send copies of any protest to Richard's Energy Group attorney at the address listed below.

By and through Counsel
 Craig Doll, Esquire
 Richard's Energy Group,
 Inc.

791 S. Chiques Road
 Manheim, PA 17545
 Phone: (717) 898-6330
 FAX: (717) 898-6331

108 Pennsylvania Plaza
 Harrisburg, PA
 Notary Public

City of Johnstown, Cambria County
 PA Commission Expires Dec 6, 2011
 My Notary Public Association is: NABP

On this 15th day of January A.D. 2016, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Christine Marhefka, who being duly sworn according to law, deposes and says as Classified Advertising Manager of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,

published continuing that the annexed of The Johnstown interested in the character of said

in the County of Cambria, and Commonwealth of Pennsylvania and in the above matter published in said publication in the regular issues Johnstown, PA, on January 12, 2016; and that the Affiant is not notice or advertising and that all of the allegations as to time, place and

Sworn and Subscribed
 15th day of January

STATEMENT OF ADVERTISING COSTS

54 Lines @ \$2.50 per line	135.00
0.00 Inches @ \$25.00 per inch	0.00
Notary Fee	5.00
Clerical Fee	2.50
Total Cost	142.50

To The Tribune-Democrat, Johnstown, PA
 For publishing the notice or publication
 attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

_____ for publisher of _____
 a newspaper of general circulation, hereby acknowledges receipt of the aforesaid
 and publication costs and certifies that the same has been duly paid.

 (Name of Newspaper)

By _____

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

Appendix H: Articles of Incorporation

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Articles of Incorporation-For Profit

(15 Pa.C.S.)

Entity Number

3114050

- Business-stock (§ 1306) Management (§ 2703)
 Business-nonstock (§ 2102) Professional (§ 2903)
 Business-statutory close (§ 2303) Insurance (§ 3101)
 Cooperative (§ 7102)

Name

John H. Frymyer, Jr.

Address

2306 Columbia Avenue

City

Lancaster, PA

State

Zip Code

17603

Document will be returned to the name and address you enter to the left.

←

Fee: \$100

Filed in the Department of State on DEC 26 2002

Michael J. Stewart

Secretary of the Commonwealth

cu

In compliance with the requirements of the applicable provisions (relating to corporations and unincorporated associations), the undersigned, desiring to incorporate a corporation for profit, hereby states that:

1. The name of the corporation (*corporate designator required, i.e., "corporation", "incorporated", "limited" "company" or any abbreviation. "Professional corporation" or "P.C."*):

Richards Energy Group, Inc.

2. The (a) address of this corporation's current registered office in this Commonwealth (*post office box, alone, is not acceptable*) or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street	City	State	Zip	County
3901 Nolt Road, Bldg 1,	Landisville,	PA	17538	Lancaster

(b) Name of Commercial Registered Office Provider County

c/o: N/A

3. The corporation is incorporated under the provisions of the Business Corporation Law of 1988.

4. The aggregate number of shares authorized: 1000

5. The name and address, including number and street, if any, of each incorporator (*all incorporators must sign below*):

Name	Address
<u>Frank J. Richards</u>	<u>3901 Nolt Road, Bldg 1, Landisville, PA 17538</u>

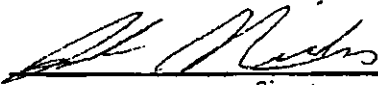
6. The specified effective date, if any: 01/01/2003
month/day/year hour, if any

7. Additional provisions of the articles, if any, attach an 8 1/2 by 11 sheet.

8. *Statutory close corporation only:* Neither the corporation nor any shareholder shall make an offering of any of its shares of any class that would constitute a "public offering" within the meaning of the Securities Act of 1933 (15 U.S.C. 77a et seq.)

9. *Cooperative corporations only: Complete and strike out inapplicable term:*
The common bond of membership among its members/shareholders is: N/A

IN TESTIMONY WHEREOF, the incorporator(s) has/have signed these Articles of Incorporation this
24th day of December, 2002



Signature

Signature



Department of the Treasury
Internal Revenue Service
PHILADELPHIA PA 19255-0038

Date of this notice:
Taxpayer Identifying Number
Form:

MAR. 24, 2003

Tax Period:

For assistance you may
call us at:

1-800-829-0115

Or you may write to us at
the address shown at the
left. If you write, be
sure to attach the bottom
part of this notice.



RICHARDS ENERGY GROUP INC
% FRANK J RICHARDS
3901 NOLT RD BLDG 1
LANDISVILLE PA 17538-1532014

NOTICE OF ACCEPTANCE AS AN S-CORPORATION

WE HAVE ACCEPTED YOUR ELECTION TO BE TREATED AS AN S CORPORATION WITH AN
ACCOUNTING PERIOD OF DECEMBER BEGINNING JAN. 1, 2003.

PLEASE KEEP THIS NOTICE IN YOUR TAX RECORDS AS VERIFICATION OF YOUR ACCEPTANCE
AS AN S-CORPORATION.

IF YOU HAVE ANY QUESTIONS ABOUT THIS NOTICE OR THE ACTIONS WE HAVE TAKEN, PLEASE
WRITE TO US AT THE ADDRESS SHOWN ABOVE. IF YOU PREFER, YOU MAY CALL US AT THE IRS
TELEPHONE NUMBER LISTED IN YOUR LOCAL DIRECTORY. AN EMPLOYEE THERE MAY BE ABLE TO
HELP YOU. HOWEVER, THE OFFICE AT THE ADDRESS SHOWN ON THIS NOTICE IS MOST FAMILIAR
WITH YOUR CASE.

IF YOU WRITE TO US, PLEASE PROVIDE YOUR TELEPHONE NUMBER AND THE MOST CONVENIENT
TIME FOR US TO CALL SO WE CAN CONTACT YOU TO RESOLVE YOUR INQUIRY. PLEASE RETURN THE
BOTTOM PART OF THIS NOTICE TO HELP US IDENTIFY YOUR CASE.

THANK YOU FOR YOUR COOPERATION.

HELPFUL HINT: FOR FASTER SERVICE, TRY CALLING US ANY DAY EXCEPT MONDAY WHEN OUR
CALL VOLUMES ARE HIGHEST.

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on
telephone calls.

Overlay 5 Form 8489 (Rev.8-91)

Keep this part for your records

Return this part to us with your check or inquiry

Your telephone number
() -

Best time to call



200311

17953-465-02002-3

INTERNAL REVENUE SERVICE
PHILADELPHIA PA 19255-0038

RICHARDS ENERGY GROUP INC
% FRANK J RICHARDS
3901 NOLT RD BLDG 1
LANDISVILLE PA 17538-1532014



261
SB

Appendix I:

Resumes

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Frank J. Richards, PE, CEP
CEO

Experience:

1968-1970 Eastman Kodak Co. Quality Control Engineer
1970-1995 PA Power & Light Co. (PPL) Engineer, Project Engineer, Sr. Power Engineer
1995-Present Richards Energy Group (REG) President

For the past 25+ years, Frank's customers have included some of the largest industrial and commercial firms in central-eastern Pennsylvania. His services to these customers have ranged from walk-through energy audits to in-depth process studies of alternative technologies, including analysis of capital, operating and maintenance costs. For the previous 16 years, he developed technical and analytical skills in the areas of electrical distribution, transmission, network analysis, voltage profiling, contingency analysis, 2 to 5 year planning studies and quality control testing and evaluation.

Qualifications/Licenses:

BS Electrical Engineering, Lehigh University, 1968
Registered Professional Engineer in PA (since 1974) and Hawaii (since 1997)
Certified Energy Procurement Professional (CEP)
Licensed Electricity Supplier, PA (since 1999)
Licensed Electricity Supplier, MD (since 2005)

Active Professional Associations:

Institute of Electrical and Electronics Engineers (IEEE)
National Society of Professional Engineers (NSPE)
PA Society of Professional Engineers (PSPE)
Association of Energy Engineers (AEE)
Association for Facilities Engineers (AFE)
Association of Builders and Contractors (ABC)

Recognition:

Frank's "win-win" approach to marketing and service to customers has resulted in national, regional and corporate recognition. He has presented several papers on energy issues at the World Energy Engineering Congress in Atlanta, Austin and Washington DC, the Competitive Energy Congress in Boston and West Coast Energy Management Congress in Anaheim, all sponsored by the Association of Energy Engineers; the Industrial Energy Technology Conference in Houston sponsored by Texas A&M University; and the National Facility Management & Technology conference in Baltimore, MD. Over the years, kudos have included a national second-place award from the Edison Electric Institute Marketing Achievement Competition, state-wide first-place and honorable-mention awards from the Pennsylvania Electric Association Industrial and Commercial Competition, and company-wide first-place award from the Pennsylvania Power & Light Marketing Recognition Competition. Frank has coordinated and taught several 10 week, Power Distribution Courses, both while working at PPL and REG, has chaired several sessions of the World Energy Engineering Congress (WEEC), and has served several years on the planning board for the WEEC

Peter F. Richards, EIT, CEM, BEP, CSDP

President

Experience:

- 1997-2001 Harley Davidson Motor Company – Engineering Co-op
- 2001-2003 RV Industries, Honey Brook, PA – Engineering Designer
- 1995-2003 Richards Energy Group (REG) Part-time – Technical Assistant
- 2003-Present Richards Energy Group (REG) Full Time – Energy Engineer

Peter's work at Harley Davidson placed him in three separate departments in the organization over his time there and ranged from assembly cell redesign to automating processes with robotics and conveyor systems. This unique experience introduced him to lean manufacturing and producing more efficiently by modifying processes. While working with RV industries, Peter was able to further develop his engineering skills by designing ASME code vessels, paper machine components, low NOx retrofits for coal power generation, and custom design and fabrication. Design efforts at RV were influenced by being heavily integrated with the in house fabrication team.

Qualifications/Licenses:

- BS Mechanical Engineering, York College, 2001
- Engineer in Training (EIT)
- Certified Energy Management Professional (CEM)
- Business Energy Professional (BEP)
- Certified Sustainable Development Professional (CSDP)

Active Professional Associations:

- Association of Energy Engineers (AEE)
- Association for Facilities Engineers (AFE)

Recognition:

Peter has become credentialed as a Certified Energy Manager and Business Energy Professional, both from the Association of Energy Engineers. He has passed the Engineer in Training exam in preparation for the Professional Engineer license. Peter has published papers and made energy-related presentations on interval data analysis, near-real time metering, predicting energy peaks, and efficient lighting systems at local and international conferences hosted by AFE and AEE.

Tara Nordby, CEP
Vice President, Operations and COO

Employment History:

- 2011 – Present: Richards Energy Group, Inc. – Vice President, Operations and COO
- 2008-2011: AllscriptsMisys, Raleigh, NC – Project Manager
- 2002-2007: Genesis Systems, Inc, Lewistown, PA – Director of Project Management
- 2000-2002: FCI Electronics, Etters, PA – Product Engineer

Tara joined Richards Energy Group, Inc in 2011. Inc. As COO & VP Operations, her primary role is to promote and maintain the company's mission. In cooperation with the company President and the Core Leadership Team, Tara is charged with the task of achieving operational objectives by contributing information and recommendations to strategic plans and reviews; preparing and completing action plans; implementing processes to improve efficiencies, quality, and customer-service standards; and resolving problems. She currently oversees daily operations of the corporations divisions, including Procurement, Energy Consulting, and Lighting.

Industry Experience:

- Electricity Procurement
- Contract Negotiation
- Supplier Relations
- Partner Relations
- Risk Management
- Project Management
- Account Management
- Customer Service
- Purchasing/RFP Management
- Market Analysis

Qualifications/Licenses:

- BSME, York College of Pennsylvania, 2000
- Certified Energy Procurement Professional (CEP)

Active Professional Associations:

- Association of Energy Engineers (AEE)
- National Society of Professional Engineers (NSPE)
- PA Society of Professional Engineers (PSPE)

Michael A. Frey, CEP

Vice President, Key Accounts

Employment History:

2001: Capital Financial Planning - Financial Planning/Asset Management

2002 – 2012: Richards Energy Group - Procurement Manager

2012 – 2014: Richards Energy Group – Director, Key Accounts & Business Development

2014 – Present: Richards Energy Group – Vice President, Key Accounts

Mike joined Richards Energy in 2002. With +15 years of professional experience, Mike has developed strong technical expertise in a wide array of energy matters. During his time at Richards Energy, Mike has grown to take on increasing responsibilities and has advanced positions to the current role of Vice President. Mike's expertise lies in market knowledge and energy procurement in the industrial/commercial sector. Mike is customer-focused and enjoys assisting clients with developing sound energy strategy and implementation. Mike has advised clients throughout the mid-Atlantic region, including PA, MD, DE, NJ, and OH. Mike provides professional energy counsel across multiple industry sectors including manufacturing, healthcare, government, education, non-profit organizations, and beyond.

Industry Experience:

Electricity Procurement

Natural Gas Procurement

Utility Tariff Analysis

Cogen/CHP Analysis

Solar Analysis

Renewable Energy

Utility Consulting

Bill Auditing

Contract Negotiation

Risk Management

Project Management

Account Management

Customer Service

Purchasing/RFP Management

Market Analysis

Qualifications/Licenses:

BS Economics & Finance, York College of Pennsylvania, 2001

Certified Energy Procurement Professional (CEP)

Active Professional Associations:

Association of Energy Engineers (AEE)

Association for Facilities Engineers (AFE)

Recognition:

Mike has maintained professional credentials and licenses for +10 years. He is registered as a Certified Energy Procurement Professional (CEP) through the Association of Energy Engineers (AEE) since 2005. He routinely applies energy knowledge and industry experience to assist energy consumers with implementation of cost-management initiatives. Mike has given several energy-related presentations on topics ranging from the procurement process and market analysis to utility bill auditing and electric deregulation.

Don A. Hornung, CEM, CEP CEA

Manager, Consulting & Fuels

Experience:

- 1973 – 1976 Hershey Foods Corp., Environmental Specialist
- 1976 – 1990 Hershey Foods Corp., Manager, Environment Affairs
- 1990 – 2002 Hershey Foods Corp., Energy Procurement Manager
- 2006 – Present Richards Energy Group Independent Contractor

For 29 years, Don has provide leadership in formulating and implementing multi-facility, multi-state, and multi-national programs to achieve environmental compliance and better manage the corporation's energy related costs. Don has conducted many environmental and energy related walk-through audits of industrial facilities throughout his career. Prior to moving to the corporate commodities procurement department, Don sat on the capital projects review committee and provided both environmental and energy related guidance during the approval process. Don also identified opportunities to aggregate gas and electric loads to reduce the supply costs, transportation, and the delivery of plant requirements while maintaining the desired levels of reliability.

Don has reviewed many utility service tariffs and negotiated contracts with multiple utilities throughout North America (Canada, USA, and Mexico) and has participated in legal affiliations associated with regulatory rule-making at the state and federal level. While in the corporate commodities procurement department, Don formulated the annual energy budget for electricity, natural gas, propane, and heating oil(s). Where applicable, Don utilized the New York Mercantile Exchange futures market to better manage cost exposure risks. He also developed a cost/risk management plan for the transportation related diesel fuel used by third-party suppliers that Hershey depended upon to move its raw materials and finished products throughout North America.

Qualifications/Licenses:

- AA. Biology, Harrisburg Area Community College – 1970
- BA. Biology, Mansfield University - 1972
- Hershey-related company training
- 34 Business-related credits, Harrisburg Area Community College (Dean's List) – 2004
- Association of Energy Engineers:
 - Certified Energy Manager – 2007
 - Certified Energy Procurement Professional – 2007
 - Certified Energy Auditor - 2009

Active Professional Associations:

- The Association of Energy Engineers (AEE– Member # 52923)
- Central PA Chapter of The Association of Energy Engineers

Recognition:

Don was the Hershey's first energy manager to successfully implement a cost-effective corporate risk management program, which provided plant, divisional, and corporate management with cost-savings and the appropriate types of information to better manage the business.

Steve Hornung

Senior Energy Analyst, Natural Gas and Electricity

Experience:

2014-2015 Richards Energy Group – Contract Administrator

2015-present Richards Energy Group – Senior Energy Analyst

With a strong technical background, Steve has developed extensive knowledge in energy consulting and purchasing on behalf of commercial, industrial and institutional clients. Steve has had the opportunity to serve in various roles at Richards Energy including Contract Administrator and Energy Analyst. While fulfilling the role of Contract Administrator, Steve performed electric and natural gas bill auditing, billing corrections with utilities and supplier, management of request for proposals (RFP), energy contract evaluation and negotiation. After Steve transitioned into the role of Senior Energy Analyst, utilizing experience gained in his previous role and expanding his responsibilities to include account management, customer relations, electric and natural gas purchasing and energy cost risk management. In addition to managing electric and natural gas supply costs, Steve utilizes an in depth understanding of electric and natural gas utility delivery rate structures aiding in the optimization of client's utility and supplier costs. With a broad understanding of the utility delivery rate structures, supply agreements and pricing models, Steve has provide consultation to clients regarding utility rate changes, combined heat power, renewable energy and energy efficiency projects.

Industry Experience:

- Electricity Procurement
- Natural Gas Procurement
- Utility Tariff Analysis
- Cogen/CHP Analysis
- Solar Analysis
- Renewable Energy
- Utility Consulting
- Bill Auditing
- Contract Negotiation
- Risk Management
- Project Management
- Account Management
- Customer Service
- Purchasing/RFP Management
- Market Analysis

Qualifications/Licenses.

AAS in Computer Networking Technology, Harrisburg Area Community College, Harrisburg PA, 2008

John Segletes, CEM, CRM
Senior Energy Engineer

Employment History/Projects:

2016 – Present: Richards Energy Group, Inc.
Senior Energy Project Engineer

2015 Concord Engineering, Philadelphia, PA
Energy Engineering Company
Senior Energy Project Engineer

Senior Energy Project Engineer – Temporary employment conducting energy audits and Trane Trace energy modeling. Energy audits were for Lower Township School District (Cape May, NJ) and the DEARNG Army Aviation Support Facility (New Castle, DE). Energy models were LEED comparison for Rector Street Apartments (21 story, Newark, NJ) and DEARNG Army Aviation Support Facility. Assisted on other energy audits and design review projects.

2015 Ecosave Automation, Philadelphia, PA
Building Automation – Automated Logic

Energy Engineer, Sales Department – Temporary employment performing energy savings review and calculations of building automation and HVAC systems. Savings calculations were based on analytical outputs from Client Company building automation systems.

4/09 – 1/15 Lilker EMO Energy Solutions, LLC, Falls Church, VA
Energy Services Company

Director of Energy Auditing – Managed team of 2-4 energy engineers on energy audits of federal, state, and local government, commercial, institutional, industrial and multi-family residential projects. Personally audited over 13 MSF of buildings for clients including GSA (Little Rock, AR), Securities and Exchange Commission (DC), National Science Foundation (Arlington, VA), Halliburton (Houston and Dallas, TX, Duncan, OK), U. S. Navy (Corpus Christi, TX, Key West, FL, Pacific Northwest, WA), St. Mary's Medical Center (Reno, NV), Sol Vista (hotels in Boston, New York, Minneapolis, Portland, San Francisco, Los Angeles and Cape Cod), Harford County, MD, Indian Health Services (MN), New Orleans Public Schools (LA), and numerous commercial buildings in the metro DC and Baltimore areas. Also completed the Executive Order 13514, Greenhouse Gas Inventories in 2008 and 2010 for the SEC, NSF and Pension Benefits Guarantee Corporation (2010).

8/03 – 4/09 Steinle Construction Engineers, Inc. Wilmington, DE
Commercial Structural, MEP Design and Commercial Building Code Review

Project Engineer – Commercial HVAC, plumbing and fire protection design and International Mechanical, Plumbing and Energy Efficiency Code review of commercial and institutional buildings for local governments. M&P design included four story office building for Endo Pharmaceuticals (Chadds Ford, PA), biological laboratory for Delaware Public Health Services

(Smyrna, DE), renovation of three story Delaware Social Services building (Newark, DE), and Overlook Colony, renovation of affordable housing project (Claymont, DE). Code review projects included Christiana Mall Expansion, New Castle County Public Safety Building, New Castle County public library, BJ's Warehouse and Walmart stores.

Qualifications/Licenses:

B.S. Mechanical Engineering, Drexel University, 1980

Certified Energy Manager (CEM)

Carbon Reduction Manager (CRM)

Mechanical Plans Examiner, 2008-2011

Home Energy Rating System (HERS), 1999-2002

Appendix C: Certificate of Service

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

On this the 15 day of July 2016, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120	Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120
Office of the Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101	Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946
Columbia Gas of PA, Inc. Thomas C. Heckathorn 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.4996 FAX: 614.460.8426 theckathorn@nisource.com	Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120
Peoples Natural Gas – Equitable Division Lynda Petrichevich 225 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com	<i>National Fuel Gas Distribution Corp.</i> David D. Wolford 6363 Main Street Williamsville, NY 14221 PH: 716.857.7483 FAX: 716.857.7479 e-mail: wolfordd@natfuel.com
The Peoples Natural Gas Company Lynda Petrichevich 225 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com	PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com
Peoples TWP LLC (Formerly T. W. Phillips) Lynda Petrichevich 225 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com	Philadelphia Gas Works Nicholas LaPergola 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.684.6278 email: nicholas.lapergola@pgworks.com
UGI Central Penn	UGI

RECEIVED

JUL 21 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

David Lahoff 2525 N. 12 th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@uqi.com	David Lahoff 2525 N. 12 th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@uqi.com
Valley Energy Inc. Robert Crocker 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: bobc@ctenterprises.org	UGI Penn Natural David Lahoff 2525 N. 12 th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@uqi.com

Tara Nordby 7/15/14

Tara Nordby, COO

Richards Energy Group

★ MAIL ★

P

US POSTAGE PAID

\$6.80

PRIORITY
★ MAIL ★



VISIT US AT USPS.COM*
ORDER FREE SUPPLIES ONLINE

AND II
MAILING

Origin: 17552
Destination: 17120
2 Lb 7.80 Oz
Jul 21, 16
4156800552-15

1005

FROM: *Richards Energy*
781 S. Chigvies Rd.
Manheim PA 17545

INTERNATIONAL
DECLARATION
NECESSARY

PRIORITY MAIL ®1-Day

Expected Delivery Day: 07/22/2016

01
1A

USPS TRACKING NUMBER



9505 5103 4186 6203 0067 96

TO:

Pennsylvania Public Utility
Commission - Secretary
400 North Street, Keystone Bld.
Harrisburg PA 17120

OFFICE OF DELIVERY

TRACKING INCLUDED

RANGE INCLUDED *

UP AVAILABLE

Domestic Only