RECEIVED

October 3, 2012

Secretary of the Commission Keystone Building, 2nd Floor, Room N201 Harrisburg, PA 17120

Re: Application for Natural Gas Supplier License – SYR Solutions, L.P.

Please find enclosed one (1) original, three (3) hard copies, and one (1) electronic copy of the Application to the Public Utility Commission (PUC) for SYR Solutions, L.P. to become licensed to provide natural gas consulting and brokerage (broker-marketer) services to large businesses in the State of Pennsylvania. Also enclosed is a check for the \$350.00 initial licensing fee.

SYR Solutions, L.P. was previously granted a license as a broker-marketer for electricity (Docket A-2010-2195563).

In the event of questions or missing information, please contact Parks Cobb at (713) 409-1532 (cell) or (281) 990-1320 (office) or by e-mail at pcobb@syrlp.com.

Best Regards,

A. Parks Cobb, Jr.

CEO

Enclosures:

Original of Application

Three (3) hard copies

One (1) electronic copy of the Application

Check for \$350.00 to Commonwealth of Pennsylvania

Copy of Application To: (see next page)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

furnish,	tion of <u>SYR S</u> or as a broke onwealth of Per	olutions L.P. r/marketer engaged in nnsylvania.	d/b/a n the business of	N/A supplying	, for approv natural gas to	ral to offer, render, o the public in the
To the i	Pennsylvania P	ublic Utility Commission	on:			
1.	IDENTITY OF the Applicant a	THE APPLICANT: Tare:	he name, addres	s, telephon	e number, an	nd FAX number o
	14027	Solutions, L.P. Memorial Drive, #42 son, Texas 77079 (281) 598-1260 (800) 741-7841	5			
		y any predecessor(s) operated within the ober				
	None					
2. a.		ERSON: The name, mander of the second of the				XX number of the
	14027 Houst Tel:	rks Cobb, Jr., CEO Memorial Drive, # 42 con, Texas 77079 (281) 598-1260 (Dire (713) 409-1532 (800) 741-7841				
b.		ERSON-PENNSYLVA telephone number an A:				
	14027 Houst Tel:	rks Cobb, Jr., CEO Memorial Drive, # 42 con, Texas 77079 (281) 598-1260 (Din (713) 409-1532 (800) 741-7841				
3.a.	ATTORNEY: Applicant's atte	If applicable, the nar orney are:	me, address, tele	phone nun	nber, and FA	X number of the
	N/A		UAE	. ค.น. c. หห <i>า</i> ร ตบ _ค	а ЗЕСВЕТ	
			33	JI MA C-	SOIS OCT	

b. **REGISTERED AGENT**: If the Applicant does not maintain a principal office in the Commonwealth, the required name, address, telephone number and FAX number of the Applicant's Registered Agent in the Commonwealth are:

National Registered Agents, Inc. 600 N. 2nd Street Harrisburg, Pennsylvania Phone: (800) 767-1553 Fax: (609) 716-0820

4.	FICTITIOUS NAME: (select and complete appropriate statement)						
	☐ The Applicant will be using a fictitious name or doing business as ("d/b/a"):						
	Attach to the Application a copy of the Applicant's filing with the Commonwealth's Department State pursuant to 54 Pa. C.S. §311, Form PA-953.						
	or						
5.	BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS: (select and complea appropriate statement)						
	☐ The Applicant is a sole proprietor.						
	If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 P 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) 						
	Describe and of a condition of the condition of the China and the Condition of the China and the Condition of the China and the						

Provide proof of compliance with appropriate Department of State filing requirements as indicated above.

Refer to Attachment 1

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.

Refer to Attachment 2

* If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, ach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.
or
The Applicant is a:
☐ domestic corporation (none)
☐ 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
Provide proof of compliance with appropriate Department of State filing requirements as indicated above. Additionally, provide a copy of the Applicant's Articles of Incorporation.
Give name and address of officers.
The Applicant is incorporated in the state of AFFILIATES AND PREDECESSORS WITHIN PENNSYLVANIA: (select and complete appropriate statement)
☐ Affiliate(s) of the Applicant doing business in Pennsylvania are: None Give name and address of the affiliate(s) and state whether the affiliate(s) are jurisdictional public utilities.
 □ Does the Applicant have any affiliation with or ownership interest in: None (a) any other Pennsylvania retail natural gas supplier licensee or licensee applicant, (b) any other Pennsylvania retail licensed electric generation supplier or license applicant, (c) any Pennsylvania natural gas producer and/or marketer, (d) any natural gas wells or (e) any local distribution companies (LDCs) in the Commonwealth If the response to parts a, b, c, or d above is affirmative, provide a detailed description and explanation of the affiliation and/or ownership interest.
 □ Provide specific details concerning the affiliation and/or ownership interests involving: None (a) any natural gas producer and/or marketers, (b) any wholesale or retail supplier or marketer of natural gas, electricity, oil, propane or other energy sources. ☑ Provide the Pa PUC Docket Number if the applicant has ever applied: (a) for a Pennsylvania Natural Gas Supplier license, or (b) for a Pennsylvania Electric Generation Supplier license. A-2010-2159563

6.

If the Applicant or an affiliate has a predecessor who has done business within Pennsylvania, give name and address of the predecessor(s) and state whether the predecessor(s) were jurisdictional public utilities.
or
☐ The Applicant has no affiliates doing business in Pennsylvania or predecessors which have done business in Pennsylvania.
APPLICANT'S PRESENT OPERATIONS: (select and complete the appropriate statement)
☐ natural gas interstate pipeline.
municipal providing service outside its municipal limits.
□ local gas distribution company
☐ retail supplier of natural gas services in the Commonwealth
☐ a natural gas producer
○ Other. (Identify the nature of service being rendered.)
Retail supplier (broker/marketer) of electricity
or
☐ The Applicant is not presently doing business in Pennsylvania.
APPLICANT'S PROPOSED OPERATIONS: The Applicant proposes to operate as a:
☐ Supplier 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.
☐ Aggregator engaged in the business of supplying natural gas services.
☐ Other (Describe):

9.	PROPOSED SERVICES: Generally describe proposes to offer.	e the natural gas services which the Applicant
	Consulting and brokerage services local government entities related to	to businesses, educational institutions, and the purchase and use of natural gas.
10.	SERVICE AREA: Provide each Natural Gas I proposes to offer services. PECO Philadelphia Gas Works UGI Penn Natural Peoples TWP LLC (Formerly T. W. Phillips) UGI Central Penn Valley Energy Inc.	Distribution Company (NGDC) in which Applicant National Fuel Gas Distribution Corp. The Peoples Natural Gas Company UGI Equitable Gas Company Columbia Gas of PA, Inc.
11.	rovide services to:	
	☐ Residential Customers	
	☐ Commercial Customers - (Less tha	n 6,000 Mcf annually)
	Commercial Customers - (6,000 M	cf or more annually)
	☐ Governmental Customers	
	☐ All of above	
	☐Other (Describe):	
12.	START DATE: The Applicant proposes to to (approximate date).	pegin delivering services on 12/1/12 or sooner

13. **NOTICE:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, serve a copy of the signed and verified Application with attachments on the following:

Irwin A. Popowsky Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120-1921 Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120

William R. Lloyd, Jr. Commerce Building, Suite 1102 Small Business Advocate 300 North Second Street Harrisburg, PA 17101 Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946

Any of the following Natural Gas Distribution Companies through whose transmission and distribution facilities the applicant intends to supply customers:

National Fuel Gas Distribution Corp.
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
375 North Shore Drive, Suite 600
Pittsburgh, PA 15212
e-mail: Lynda.w.petrichevich@peoples-gas.com
PH: 412.208.6528
FAX: 412.208.6577
UGI
David Beasten
2525 N. 12th Street, Suite 360
Reading, PA 19612-2677
PH: 610.796.3425
FAX: 610.796.3559
Equitable Gas Company
Jerald Moody
225 North Shore Drive
Pittsburgh, PA 15212-5352
PH: 412.395.3209 FAX: 412.395.3335
Columbia Gas of PA, Inc.
Thomas C. Heckathorn
200 Civic Center Drive
Columbus, OH 43215
PH: 614.460.4996 FAX: 614.460.6442
e-mail: theckathorn@nisource.com

Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, attach Proof of Service of the Application and attachments upon the above named parties. 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.

(refer to Attachment 4)

- 14. **TAXATION:** Complete the <u>TAX CERTIFICATION STATEMENT</u> attached as Appendix A to this application. <u>Attached</u>
- 15. **COMPLIANCE:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application has been convicted of a crime involving fraud or similar activity. Identify all proceedings, by name, subject and citation, dealing with business operations, in the last five (5) years, whether before an administrative body or in a judicial forum, in which the Applicant, an affiliate, a predecessor of either, or a person identified herein has been a defendant or a respondent. Provide a statement as to the resolution or present status of any such proceedings. **No convictions of any kind.**
- 16. STANDARDS, BILLING PRACTICES, TERMS AND CONDITIONS OF PROVIDING SERVICE AND CONSUMER EDUCATION: All services 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.
 - a. Contacts for Consumer Service and Complaints: Provide the name, title, address, telephone number and FAX number of the person and an alternate person responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with Applicant, the Distribution Company, the Pennsylvania Public Utility Commission or other agencies. Refer to Attachment 3
 - b. Provide a copy of all standard forms or contracts that you use, or propose to use, for service provided to residential customers. **N/A**
 - c. If proposing to serve Residential and/or Small Commercial customers, provide a disclosure statement. A sample disclosure statement is provided as Appendix B to this Application, N/A

17. FINANCIAL FITNESS:

- A. Applicant shall 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.
- Published parent company financial and credit information.
- Applicant's balance sheet and income statement for the most recent fiscal year*. Published financial information such as 10K's and 10Q's may be provided, if available.
- 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 or other independent financial service reports.
- 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.
- Audited financial statements
- Such other information that demonstrates Applicant's financial fitness. **Refer to Attachment 5.**
- B. Applicant must provide the following information:
- Provide proof of compliance with bonding/credit requirements for each NGDC the applicant is
 proposing to provide service in. This requirement is designated by each NGDC and can
 commonly be found in the NGDC supplier tariff. N/A-Refer to Attachment 6
- Identify Applicant's chief officers including names and their professional resumes.
 Refer to Attachment 7 and website at www.syrlp.com

- Provide the name, title, address, telephone number and FAX number of Applicant's custodian for its accounting records.
 - Refer to Attachment 3.
- 18. **TECHNICAL FITNESS:** To ensure that the present quality and availability of service provided by natural gas utilities does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:
 - The identity of the Applicant's officers directly responsible for operations, including names and their professional resumes.

Refer to Attachment 7 and website at www.syrlp.com

- A copy of any Federal energy license currently held by the Applicant. N/A
- · Proposed staffing and employee training commitments. N/A
- Business plans, N/A
- 19. **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. Section 2208(D). Transferee will be required to file the appropriate licensing application. **Understood.**
- 20. **UNIFORM 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. **Agreed.**
- 21. **REPORTING REQUIREMENTS**: Applicant agrees to provide the following information to the Commission or the Department of Revenue, as appropriate:
 - a. Reports of Gross Receipts: Applicant shall report its Pennsylvania intrastate gross receipts to the Commission on an annual basis no later than 30 days following the end of the calendar year. N/A

Applicant will be required to meet periodic reporting requirements as may be issued by the Commission to fulfill the Commission's duty under Chapter 22 pertaining to reliability and to inform the Governor and Legislature of the progress of the transition to a fully competitive natural gas market.

- 22. FURTHER DEVELOPMENTS: Applicant is under a continuing obligation to amend its application if substantial changes occur in the information upon which the Commission relied in approving the original filing. Understood
- 23. **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. **Understood**
- 24. **FEE:** The Applicant has enclosed the required initial licensing fee of \$350.00 payable to the Commonwealth of Pennsylvania. **Enclosed.**

Applicant::_	SYR Sou	WILONS, L.P.	
ву: 🗚	off	, ,	
Title:	0		

AFFIDAVIT

[Commonwealth/State] ofNorth Carolina	:
	: ss .
County of :	
Alton Parks Cobb, Jr. , Affiant, being duly [sworn/a	/affirmed] according to law, deposes and says that:
[He/she is theCEO(Office of Affice Applicant);]	Affiant) of <u>SYR Solutions, L.P.</u> (Name of
[That he/she is authorized to and does make this affida-	lavit for said Applicant;]
That SYR Solutions, L.P., the Applicant herein, pursuant to this Application consistent with the Public Utility Code the Pennsylvania Consolidated Statutes; or with other applicable stawhich may be issued verbally or in writing during any emergency sto time in the course of doing business in Pennsylvania.	de of the Commonwealth of Pennsylvania, Title 66 of statutes or regulations including Emergency Orders
That SYR Solutions, L.P., the Applicant herein, asserts managerial, and financial fitness to render natural gas supply servic that the Applicant will abide by all applicable federal and state laws Public Utility Commission.	vice within the Commonwealth of Pennsylvania and
That SYR Solutions, L.P., the Applicant herein, certifies to and in the past has paid, the full amount of taxes imposed by Article 2), known as the Tax Reform Act of 1971 and any tax imposed by acknowledges that failure to pay such taxes or otherwise comply we cause for the Commission to revoke the license of the Applicant. To Commission its jurisdictional natural gas sales for ultimate consumby the Commission. The Applicant also acknowledges that it is sub of facilities and records).	icles II and XI of the Act of March 4, 1971 (P.L. 6, No. by Chapter 28 of Title 66. The Applicant with the taxation requirements of Chapter 28, shall be The Applicant acknowledges that it shall report to the amption, for the previous year or as otherwise required
Applicant, by filing of this application waives confidentiality with of the Department of Revenue, regardless of the source of the information to the Pennsylvania Public Util	formation, and shall consent to the Department of
That SYR Solutions, L.P., the Applicant herein, acknowledges 66 Pa. C.S. §506, §2807 (C), §2807(D)(2), §2809(B) and the standa 56.	ndards and billing practices of 52 PA. Code Chapter
Natural Gas Supplier License Application PA PLIC Decument #: 130346	REC 2012 OCT - SECRETAR

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Commission's Office of Communication 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 _

_ day of

Signature of official administering oath

My commission expires Jehney 16-2014

VONNIE KAYE HELMS
Notary Public, North Carolina
Montgomery County
My Commission Expires
2-16-20-14

(To Be Supplied Later after Docket Number is Provided)

AFFIDAVIT

[Commonwealth/State] of		· · · · · · · · · · · · · · · · · · ·	<u>:</u>		ς. `	OC)	9/
			:	SS.	CACIA	',	ا رم
County of:					'77,	Cr 5 AM	(O. 35
Alton Parks Cobb, Jr. , Affiant, being	g duly [swori	n/affirmed] a	according	to law, de	poses and	i says that	·- ·-
He/she is the <u>CEO</u> (Office of Affia	ant) of <u>SY</u>	'R Solut	ions, L.P	(Name	e of Applic	ant);]
That he/she is authorized to and does mak	e this affidav	vit for said A	.pplicant;]				
That SYR Solutions, L.P. , the Application to be published in the following new		rtifies that it h	nas caused	the notice	of the filing	g of its licer	ise
: (date)							
A copy of the notice as it appeared in each of the section (name, number or letter), if applicable, a That SYR Solutions, L.P. , the Applic	and the page n	number on wh	nich the no	tice appear	ed.		
newspaper in which notice of the application fili					puoneation	nom each	
That the facts above set forth are true and correct he/she expects said Applicant to be able to prove			wledge, in	formation,	and belief,	and that	
		Signat	ture of Aff	iant			
Sworn and subscribed before me this	day of		,	20			
	Sig	gnature of of	fficial adm	ninistering	oath		
	My commis	ssion expires	s				

AFFIDAVIT

RECEIVED

2012 OCT -5 AM 10: 35 [Commonwealth/State] of North Carolina PA P.U.C. SECRETARY'S BUREAU : SS. Alton Parks Cobb, Jr., Affiant, being duly [sworn/affirmed] according to law, deposes and says that: CEO (Office of Affiant) of __SYR Solutions, L.P. (Name of Applicant);] [He/she is the [That he/she is authorized to and does make this affidavit for said Applicant;] That the Applicant herein **SYR Solutions, L.P.** 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. § 2809 (B). That the Applicant herein **SYR Solutions, L.P.** has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required. SYR Solutions, L.P. acknowledges that it is under a duty to update information provided in That the Applicant herein answer to questions on this application and contained in supporting documents. That the Applicant herein SYR Solutions, L.P. 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. Signature of Affiant Sworn and subscribed before me this gnature of official administering oath 16,2014 Notary Public, North Carolina Montgomery County My Commission E

Natural Gas Supplier License Application PA PUC Document #: 139346

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Appendix B

Page 1 of 2

Sample Disclosure Statement Format for Natural Gas Suppliers

This is an agreement for natural gas services, between NGS name and customer's name and full address.

Background

We at NGS Company Name are licensed by the Pennsylvania Public Utility Commission to offer and supply natural gas services in Pennsylvania. Our PUC license number is A-110XXX.

- We set the prices and charges that you pay. The Public Utility Commission regulates distribution or delivery prices and services. The Federal Energy Regulatory Commission regulates interstate pipeline prices and services.
- If you ask us, we can bill you directly for our service.
- Right of Recision You may cancel this agreement at any time before midnight of the third business day after receiving this disclosure.

Definitions

- Interstate Pipeline Charges Charges for moving natural gas to the distribution lines of a distribution company.
- Nonbasic Charges Define each nonbasic service being offered.

Terms of Service

Basic Service Prices - Itemize Basic Services you are billing for and their prices.

You will pay <u>rate per</u> (Mcf/Dth/ccf) for the commodity of natural gas. Suppliers are to include any variable pricing conditions and limits, if charging a variable rate.

You will pay <u>rate per</u> (Mcf/Dth/ccf) for other natural gas service. Suppliers are to include transmission service prices if billed.

- (b) Nonbasic Service Prices Itemize Nonbasic Services you are offering and their prices.
- 2. **Length of Agreement**

You will buy your natural gas services for the above street address from company's name beginning date through date of expiration, if any.

3. Special Terms and Conditions - List and explain all that apply. Sign-up bonuses Add-ons Limited time offers Other Sales Promotions

Exclusions

Special Services - Provide explanation of price, terms and conditions, including advanced metering deployment, 4. if applicable.

SECRETARY'S BUREAU

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Natural Gas Supplier License Application PA PUC Document #: 139346 Updated March 2012

- **5. Penalties, Fees and Exceptions** List any that apply including a late payment charge. The print size for this section must be larger than the print in the rest of the agreement.
- **6.** Cancellation Provisions This category may consist of both customer initiated cancellation provisions and supplier initiated cancellation provisions.
- 7. Renewal Provision If this is a fixed term agreement with automatic renewal, explain the procedure here.

8. Agreement Expiration/Change in Terms

If you have a fixed term agreement with us and it is approaching the expiration date **or** if we propose to change our terms of service, we will send you written notice in each of our last three bills or in separate mailings before either the expiration date or the effective date of the changes. We will explain your options in these three advance notices.

9. Dispute Procedures

Contact Information

10.

Contact us with any questions concerning our terms of service. You may call the PUC if you are not satisfied after discussing your terms with us.

Sunnier Neme	
Supplier Name:	
Address:	
Phone Number:	
Internet Address:	
Distribution Company Name:	
Provider of Last Resort Name:	
Address:	
Phone Number:	
Public Utility Commission (PUC) Address: Natural Gas Competition Hotline Number:	P.O. Box 3265 Harrisburg, PA 17105-3265 1-888-xxx-xxxx
Universal Service Program Name:	
Phone Number:	

APPENDIX CPROPOSED NOTICE – SYR SOLUTIONS, L.P.

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Application of **SYR Solutions, L.P.** For Approval To Offer, Render, Furnish Natural Gas Supply Services As A Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania, Docket No. **(To Be Added When Provided).**

On October 3, 2012, **SYR Solutions, L.P.** filed an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas supply services. **SYR Solutions, L.P.** proposes to broker/market natural gas service and related services throughout all of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **SYR Solutions**, **L.P.** 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 SYR Solutions, L.P.'s attorney at the address listed below. Please include the PUC's "docket number" on any correspondence, which is *(To Be Added When Provided)*.

By and through Counsel: Clawson L. Williams, Jr.

SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079 281-598-1070 800-741-7841

SECRETARY'S BUREAU

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SECRETARY'S BUREAU

APPENDIX D

Standards of Conduct

- (1) The [natural gas distribution company] should apply its tariffs in a nondiscriminatory manner to its affiliate, its own marketing division and any nonaffiliate.
- (2) The [natural gas distribution company] should likewise not apply a tariff provision in any manner that would give its affiliate or division an unreasonable preference over other marketers with regard to matters such as scheduling, balancing, transportation, storage, curtailment, capacity release and assignment, or nondelivery, and all other services provided to its affiliated suppliers.
- (3) If a tariff provision is mandatory, the [natural gas distribution company] should not waive the provision for its affiliate or division absent prior approval of the Commission.
- (4) If a tariff provision is not mandatory or provides for waivers, the [natural gas distribution company] should grant the waivers without preference to affiliates and divisions or non-affiliates.
- (5) The [natural gas distribution company] should maintain a chronological log of tariff provisions for which it has granted waivers. Entries should include the name of the party receiving the waiver, the date and time of the request, the specific tariff provision waived and the reason for the waiver. Any chronological log should be open for public inspection during normal business hours.
- (6) The [natural gas distribution company] should process requests for transportation promptly and in a nondiscriminatory fashion with respect to other requests received in the same or a similar period. The [natural gas distribution company] should maintain a chronological log showing the processing of requests for transportation services. Any chronological log should be open for public inspection during normal business hours.
- (7) Transportation discounts and fee waivers and rebates provided to the [natural gas distribution company's] or its marketing affiliate's favored customers should be offered to other similarly situated customers and should not be tied to any unrelated service, incentive or offer on behalf of either the parent of affiliate. A chronological

- log should be maintained showing the date, party, time and rationale for the action. Any chronological log should be open for public inspection during normal business hours.
- (8) The [natural gas distribution company] should not disclose any customer proprietary information to its marketing affiliate or division, and to the extent that it does disclose customer information, it should contemporaneously paovide this same information to other similarly situated marketers in a similar fashion so as not to selectively disclose, delay disclosure, or give itself or its affiliate any undue advantage related to the disclosure. A chronological log should be maintained showing the date, time and rationale for the disclosure. Any chronological log should be open for public inspection during normal business hours. A natural gas distribution company should not provide information received from non-affiliated customers or suppliers to its affiliated natural gas suppliers.
- (9) The [natural gas distribution company] should justly and reasonably allocate to its marketing affiliate or division the costs or expenses for general administration or support services.
- (10) The [natural gas distribution company] selling surplus gas supplies and/or upstream capacity on a short-term basis (as defined by the Federal Energy Regulatory Commission) to its affiliate should make available similarly situated supplies to marketers nondiscriminatory basis. The [natural gas distribution company] should not make any gas supplies and/or upstream capacity available through private disclosure to the [natural gas distribution company's] affiliate unless the availability is made simultaneously with public dissemination in a manner that fairly apprises interested parties of the availability of the gas supplies and/or upstream capacity. [natural gas distribution company] should maintain a chronological log of these public disseminations. Any chronological log should be open for public inspection during normal business hours.
- (11) The [natural gas distribution company] should not condition or tie agreements to release interstate pipeline capacity to any service in which the [natural gas distribution company] or affiliate is involved.
- (12) The [natural gas distribution company] should not directly or by implication . . . represent to any customer, supplier or third party that an advantage may accrue to any party through use of the [natural gas distribution company's] affiliate or subsidiary.

- (13) The [natural gas distribution company] should establish and file with the Commission a complaint procedure for dealing with any alleged violations of any of the standards listed in paragraphs (1) through (12), this paragraph or paragraphs (14) and (15), excepting for paragraph (9), which should be exclusively under the purview of the Commission. These procedures should be developed in consultation with interested parties during consideration of any tariff guided by this section and §69.191 (relating to general). The Commission may expect establishment of a complaint procedure or other recordkeeping requirements if warranted by subsequent facts or circumstances.
- (14) The [natural gas distribution company] should keep a chronological log of any complaints, excepting paragraph (9), regarding discriminatory treatment of natural gas suppliers. This chronological log should include the date and nature of the complaint and the [natural gas distribution company's] resolution of it. Any chronological log should be open for inspection during normal business hours.
- (15) Parties alleging violations of these standards may pursue their allegations through the Commission's established complaint procedures. A complainant bears the burden of proof consistent with 66 Pa. C.S. (relating to Public Utility Code) in regard to the allegations.
- (16) Licensees shall provide accurate information about their natural gas supplier services using plain language and common terms. Where new terms are used, such terms must be defined again using plain language: Information should be provided in a format which will allow for comparison of the various natural gas supply services offered and the prices charged for each type of service.
- (17) Licensees shall provide notification of the change in conditions of service, intent to cease operation as an natural gas supplier, explanation of denial of service, proper handling of deposits and proper handling of complaints in accordance with Commission regulations where applicable.
- (18) Licensees shall maintain the confidentiality of customers' historic payment information and right of access to their own load and billing information.

- (19) Licensees shall not discriminate in the provision of natural gas supply services as to availability and terms of service based on race, color, religion, national origin, sex, marital status, age receipt of public assistance income, and exercise of rights under the Consumer Credit Protection Act, 15 U. S. C. §§1691-1691f; Regulation B, 12 C.F.R. §§202-202.14.
- (20) Licensees will be responsible for any fraudulent deceptive or other unlawful marketing or billing acts performed by their agents or representatives. Licensee shall inform consumers of state consumer protection laws that govern the cancellation or rescission of natural gas supply service contracts. 73 P. S. §201-7.
- (21) The natural gas distribution company shall not give any affiliate or marketing division preference over a non-traditional affiliate in the provision of goods and services such as processing requests for information, complaints and responses to service interruptions. The natural gas distribution company shall provide comparable treatment without regard to a customer's chosen natural gas supplier.
- (22) No transaction between the natural gas distribution company and an affiliated natural gas supplier shall involve an anti-competitive cross-subsidy and all such transactions shall comply with applicable law.
- (23) Natural gas distribution company employees who have responsibility for operating the distribution system, including natural gas delivery or billing and metering, shall not be shared with an affiliated or divisional Supplier, and their offices shall be physically separated from the office(s) used by those working for the Supplier. Such natural gas distribution company employees may transfer to a Supplier provided such transfer is not used as a means to circumvent these interim standards of conduct. Any supplier shall have its own direct line management. Any shared facilities shall be fully and transparently allocated between the natural gas distribution company function and the Supplier function. The natural gas distribution company accounts and records shall be maintained such that the costs a Supplier incurs may be clearly identified.
- (24) (a) Neither the natural gas distribution company nor an affiliated or divisional Supplier may directly or by implication falsely and unfairly represent:

- that the Pa PUC jurisdictionally regulated services provided by the natural gas distribution company are of a superior quality when power is purchased from an affiliated or divisional Supplier; or
- that the merchant services (for natural gas) are being provided by the natural gas distribution company rather than an affiliated or divisional Supplier;
- that the natural gas purchased from a Supplier that is not an affiliate or division of the natural gas distribution company may not be reliably delivered;
- that natural gas must be purchased from an affiliate or divisional Supplier to receive Pa PUC jurisdictional regulated services.
- (b) The natural gas distribution company shall not jointly market or jointly purchase its Pa PUC jurisdictional regulated services with the services of an affiliated or divisional Suppler. This prohibition includes prohibiting the natural gas distribution company from including bill inserts in its natural gas distribution company bills promoting an affiliated or divisional Supplier's services, and further precludes a reference or link from the natural gas distribution company's web-site to any affiliated or divisional supplier.
- (c) When an affiliated or divisional Supplier markets or communicates to the public using the natural gas distribution company name or logo, it shall include a disclaimer that states:
 - (i) That the Supplier is not the same company as the natural gas distribution company; (2) that the prices of the Supplier are not regulated by the Pa PUC; and (3) that a customer does not have to by natural gas or other products from the Supplier in order to receive the same quality service from the natural gas distribution company. When a Supplier advertises or communicates verbally through radio or television to the public using the natural gas distribution company name or logo, the Supplier shall include at the conclusion of any such communication a disclaimer that includes all of the disclaimers listed in this paragraph.
- (25) The natural gas distribution company must: (a) make interstate capacity available for release, assignment, or transfer to its affiliated or divisional Supplier only through the intestate pipeline electronic bulletin boards and the competitive bidding procedures in place on those interstate systems; (b)

not give its affiliated or divisional Supplier any preference over non-affiliated or non-divisional Suppliers, or potential non-affiliated or non-divisional Suppliers, in matters relating to the assignment, release, or other transfer of the natural gas distribution company's capacity rights on interstate pipeline systems; and (c) not condition or tie its agreement to release, assign, or otherwise transfer interstate pipeline capacity to any agreement by a gas Supplier, customer or other third party relating to any service in which its marketing affiliate is involved.

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SECRETARY'S BUREAU

The attached seven (7) pages provide evidence of previous registration to do business in the states of Texas and Pennsylvania.

A. P. Cobb, Jr., CEO

SYR Solutions, L.P.

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PA P.U.C. SECRETARY'S BUREAU COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
CORPORATION BUREAU
401 NORTH STREET, ROOM 206
P.O. BOX 8722
HARRISBURG, PA 17105-8722
WWW.CORPORATIONS.STATE.PA.US/CORP

SYR Solutions, L.P.

THE CORPORATION BUREAU IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE CORPORATION BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE CORPORATION BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT <u>WWW.CORPORATIONS.STATE.PA.US/CORP</u> OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 3927868

Cobb, Parks 11999 Katy Freeway Suite 510 Houston, TX 77079

Entity #: 3927868 Date Filed: 12/03/2009 Pedro A. Cortés Secretary of the Commonwealth

ST, PAO4B

From:

pao4b@state.pa.us

Sønt:

12/4/2009

Thursday, December 03, 2009 12:23 PM

To:

ST, PAO4B

Subject: PAO4B New Registration 275357

PENNSYLVANIA DEPARTMENT OF STATE **CORPORATION BUREAU** Application For Registration - Foreign

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Email:	рсовь@вупр.соп				7	T0934347132		
Fee: \$2	50							
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		rds Registered Office	Provider					County
	National Registered	Agems, Inc.	_					Deuphin
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	Number and Street			City	State	Z2p		
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	Mumber and Street	City		State	Zp	CC	raa	7
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professional company organized to render the following professional services(s):

Name Torheel Investments The address of the office	<u>nddress of sech gonoral p</u> Address(es) - G.P., LLG - 11999 K g as which he kept a Hes of t	aty Freeway	Suite 5 Paren est	To Houston TX 7 no limited partners and th	707 ^c etr capi
contribution is: Number and Street		City	State	Zip	
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The registered partnersh Commonwealth is cance	il <u>b hereby undertakes to k</u> led or withdrawn,	oop those means.	untilita no	intration to do business	kothe
			IN TESTIMONY WHEREOF, the under has caused this Application for Regist be signed by a duty sutherized efficient or manager thereof this day of		
				Name of Partnership/Comp	eny
			·-· ·-	Signature	
				Title	••
			O535720	091203	

Page 2 of 3 Page 2 of 2

PENNSYLVANIA DEPARTMENT OF STATE CORPORATION BUREAU Foreign Signature Form

Document must be completed and mailed to the address listed below.

Department of State Corporation Bureau P.O. Box 8722 Hamsburg, PA 17105-8722 (717) 787-1057

- 1. The enterprise structure is: Limited Partnership
- 2. The enterprise legal name is: SYR Solutions, L.P.
- 3. The enterprise's fictitious name is:

INVESTIMONY WHEREOF, the undersigned had day of 12009	ye caused this application to be executed this
SYR SOLUTIONS, L. P. Enterprise Name	
Signature CEO/Owner Title	

0535720091203

To avoid any delay or rejection, signature form(s) should be received within 7-10 days of the registration submission date.

Parks Cobb

From:

pao4b@state.pa.us

Sent:

Thursday, December 03, 2009 11:23 AM

To:

pcobb@syrlp.com

Cc:

RA-PAO4BRegistration@state.pa.us

Subject:

Registration Confirmation

Pennsylvania Open for Business Registration Confirmation.....

PA PowerPort Universal Login User ID : 458941

PA PowerPort Universal Login User EMail: pcobb@syrlp.com
Enterprise Registration ID: 0535720091203
Enterprise Name: SYR Solutions, L.P.

Enterprise Registration Submission Date : 12/03/2009

Thank you for using Pennsylvania Open for Business to register your enterprise online!

Your registration for the enterprise has been received and will be forwarded to the Commonwealth of Pennsylvania agencies listed below.

The Departments of Revenue, Labor and Industry, and State are currently the only Commonwealth agencies participating in PA Open for Business.

Department of State

The PA Open for Business Business Registration Processing Timeline outlines the expected registration processing time for the

Departments of Labor and Industry, Revenue, and State. Click here or on the following link to view the Timeline. http://www.paopen4business.state.pa.us/paolb/ewp/view.asp?a=3&q=440653



Office of the Secretary of State

CERTIFICATE OF FILING OF

SYR Solutions, LP File Number: 800596377

The undersigned, as Secretary of State of Texas, hereby certifies that a Certificate of Formation for the above named Domestic Limited Partnership (LP) has been received in this office and has been found to conform to the applicable provisions of law.

ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing filing effective on the date shown below.

The issuance of this certificate does not authorize the use of a name in this state in violation of the rights of another under the federal Trademark Act of 1946, the Texas trademark law, the Assumed Business or Professional Name Act, or the common law.

Dated: 01/09/2006

Effective: 01/09/2006



Roger Williams Secretary of State

of Minims

TTY: 7-1-1

Document: 113631040002





Certificate Validation

The online certificate validation process can be used to verify that a certificate of filing or a certificate of fact has, in fact, been issued by the Corporations Section of the Texas Secretary of State.

Enter the document number that appears at the bottom of the document you wish to verify, then elick on the Validate button.

Click here to view where the document number is located on the certificate form.

This certificate validation service applies only to certificates of filing, certificates of fact, and information letters issued on and after January 1, 2006 in connection with business organization documents on file with the Corporations Section of the Office of the Secretary of State.

Certificates generated in connection with state trademark registrations or UCC filings cannot be verified through this service.

If you experience problems with this service, please contact us at <u>SOSDirect@sos.state.tx.us</u> or call us at (512) 475-2755.

Document Number 113631040002

Validate Clear

File Number:

Entity Name: SYR Solutions, LP

File Type: Certificate of Formation

800596377

Document Number: 113631040002

File Date: 1/9/2006

Effective Date: 1/9/2006

Click here to view your certificate.

General Partner (Texas LLC) - 0.01% Ownership

Tarheel Investments GP, LLC 14027 Memorial Drive, #425 Houston, TX 77079

Limited Partner (North Carolina L.P.) - 99.99% Ownership

PK Group, L.P. 3141 Seven Lakes West West End, NC 27376

Both of the above entities are owned in entirety by Alton Parks Cobb, Jr. and spouse Kitty Butler Cobb and are for the purpose of owning family businesses.

PA P.U.C. SECRETARY'S BUREAL

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Contact for Consumer Service and Complaints:

A. Parks Cobb, Jr., CEO SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079

Tel: (281) 990-1320 (Office-Direct)

(713) 409-1532 (Cell)

Fax: (800) 741-7841

Applicant's Custodian for Accounting Records:

A. Parks Cobb, Jr., CEO SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079

Tel: (281) 990-1320 (Office-Direct)

(713) 409-1532 (Cell)

Fax: (800) 741-7841

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Certification of Application Submittals

This is to certify that:

1) a complete copy of this Application was sent to Mr. Irwin A. Popowsky, Office of Consumer Advocate; the Office of the Attorney General, Bureau of Consumer Protection; Mr. William R. Lloyd, Jr., Small Business Advocate; and the Commonwealth of Pennsylvania Department of Revenue on October 3, 2012 at the addresses listed on Page 7 of this Application, and

- 2) a complete copy of this application was sent to NGDC contacts listed on Page 7 of this Application at the addresses shown on Page 7 of this Application, and
- 3) a signed and verified original and three copies and an electronic copy of this Application were sent to Secretary of the Commission, Keystone Building, 400 North Street, 2nd Floor, Room N201, Harrisburg, PA 17120 on October 3, 2012.
- 4) USPS receipt confirmations have been requested for all of the above addressees and can be provided once received, if required, but obviously cannot be provided with this Application due to simultaneous mailing to the Commission and parties listed.

A. P. Cobb, Jr., CEO

SYR Solutions, L.P.

PA P.U.C. SECRETARY'S BUREAU

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Attachment 5

Financial Statements

SYR Solutions, L.P.

Note: SYR Solutions, L.P. is a small but adequately capitalized single owner private business that does not have internal needs for audited financial reports or a D&B rating but enjoys excellent credit with all of its suppliers. The attached financial reports and enclosed evidence of a \$10,000 bond are submitted as evidence of the company's capability to meet its financial obligations incurred when conducting its consulting business in Pennsylvania. These reports are considered to be confidential and proprietary by SYR Solutions, L.P.

A. P. Cobb, Jr., CEO

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Attachment 6

SECRETARY'S BUREAU

Bonding/Credit Requirements of NGDC's

SYR Solutions, L.P.

Please refer to the attached letters from all NGDCs serving Pennsylvania certifying that they do not require credit posting or bonding from SYR Solutions, L.P. since the company will only be involved in broker/marketing of natural gas in Pennsylvania.

A. P. Cobb, Jr., CEO

July 19, 2012

VIA EMAIL

A. Parks Cobb, Jr. CEO SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079

Dear Mr. Cobb:

We understand that SYR Solutions, LP 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 SYR Solutions, LP intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that SYR Solutions, LP 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 or failure to meet our requirements for credit worthiness changes in the future, we reserve the right to require security from SYR Solutions, LP 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



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

(610) 796-3400 Telephone

July 20, 2012

Parks Cobb SYR Solutions, LP 14027 Memorial Drive, #425 Houston, TX 77079

Re: SYR Solutions, LP's application to serve as a Pennsylvania Natural Gas Broker

Dear Mr. Cobb,

UGI Utilities Inc. ("UGIU") has reviewed the license application of SYR Solutions, LP ("SYR Solutions") to serve as a natural gas broker in Pennsylvania. Based on the information in the application and the understanding that, as a natural gas broker, SYR Solutions will not be taking title to gas to directly serve end use customers and that SYR Solutions will be acting on the behalf of a licensed Natural Gas Supplier who has been approved to serve in the applicable UGI service territories and who has posted the required financial security as specified in the respective tariffs, UGIU has concluded that, at this time, SYR Solutions will not need to post security with UGI-Central Penn Gas, UGI-Penn Natural Gas or UGI Utilities Gas Division. If SYR Solutions decides to change the nature of its license or business and directly serve Choice customers in any of the UGI service territories in the future as a natural gas supplier, SYR Solutions must post security as specified in the respective tariffs prior to the commencement of the service.

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

if F. Loff

Sincerely,

David E. Lahoff Manager, Rates UGI Utilities, Inc.



July 30, 2012

A. Parks Cobb, Jr. CEO SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079

Dear Mr. Cobb:

This letter serves as notification that Peoples TWP LLC does not SYR Solutions, L.P. to provide a security or credit enhancement at this time. Our decision is based on the fact that your company is not currently operating, and has no immediate plans to operate, a Non-Priority One Pool or a Priority One Pool on the Peoples TWP system. However, if in the future your company desires to establish a Non-Priority One Pool or a Priority One Pool on the Peoples TWP system, it may be required to establish a security or credit enhancement based on the terms set forth under Paragraphs 19 and 20 of the Rules and Regulations of the Peoples TWP Tariff.

If you have any questions feel free to contact me at 724-431-4935 or by email at Andrew.Wachter@peoplestwp.com.

Sincerely,

Andrew Wachter
VP Finance and Rates
Peoples TWP LLC



August 15th, 2012

August 15th, 20

SYR Solutions, L.P. 14027 Memorial Dr Houston, Tx 77079

Re: Bonding Requirements

Dear A Parks Cobb, Jr.

PECO is aware that SYR Solutions 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, SYR Solutions could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. SYR Solutions 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 SYR Solutions 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 SYR Solutions or the creditworthiness requirement for PECO's exposure to SYR Solutions changes in the future, PECO reserves the right to require SYR Solutions 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,

Carlos P. Thillet

Manager, Gas Supply and Transportation

Calor Tille

2301 Market St S9-1

Philadelphia, Pa 19103

Philadelphia Gas Works



800 W. Montgomery Ave., Philadelphia, PA 19122 Telephone: 215-236-0500

July 20, 2012

Mr. A. Parks Cobb, Jr. SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079

Re: Security Requirement Bond for SYR Solutions, L.P.

Dear Mr. Cobbs:

Philadelphia Gas works (PGW") is aware that SYR Solutions, L.P. 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, SYR Solutions, L.P. must furnish acceptable security to each utility where SYR Solutions, L.P. will do business. As such, under its tariff, Philadelphia Gas Works could require SYR Solutions, L.P. 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 SYR Solutions, L.P. intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, SYR Solutions, L.P. will never take title to any delivered natural gas.

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

If you have any questions concerning the foregoing, please contact me at (215) 684-6899.

Douglas A Moser

Executive VP & COO

Executive Office

рам:ь



July 30, 2012

Mr. A. Parks Cobb, Jr. CEO SYR Solutions, L.P. 14027 Memorial Drive #425 Houston, TX 77079

Re: Security Requirement for SYR Solutions, L.P.

Dear Parks:

National Fuel Gas Distribution Corporation ("NFGDC") is aware that SYR Solutions, L.P. ("SYR") has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the service territory of NFGDC.

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

However, you have indicated, and it is NFGDC's understanding that, SYR intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, SYR will never take title to any delivered natural gas.

Based upon your representations, NFGDC has determined that, at this time, SYR does not need to post a bond or other form of security to operate in its service territory. However, if the services provided by SYR change in the future, NFGDC reserves the right to require security from SYR as it deems appropriate.

If you have any questions concerning the foregoing, please contact me at 716-857-7599.

Nathan E. Barnes

Transportation Services Department



July 20, 2012

A. Parks Cobb, Jr. CEO SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079

Dear Mr. Cobb:

This letter serves as notification that Peoples Natural Gas Company does not require SYR Solutions, L.P. to provide a security or credit enhancement. Our decision is based on the fact that your company is not currently operating, and has no immediate plans to operate, a Non-Priority One Pool or a Priority One Pool on the Peoples Natural Gas system. However, if in the future your company desires to establish a Non-Priority One Pool or a Priority One Pool on the Peoples Natural Gas Company system, it may be required to establish a security or credit enhancement based on the terms set forth under Paragraphs 6 and 7 of the Rules and Regulations of The Peoples Natural Gas Company Supplier Tariff.

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

Manager, Rates and Regulatory Affairs

Peoples Natural Gas Company LLC



Equitable Gas Company 225 North Shore Drive Pittsburgh, PA 15212-1234 t 412.395.3216 www.equitablegas.com

August 8, 2012

Mr. A. Parks Cobb, Jr. CEO SYR Solutions, L.P. 14027 Memorial Dr. #425 Houston, Texas 77079

Dear Mr. Cobb:

We are pleased that SYR Solutions, L.P. ("SYR") has applied for a license to provide natural gas broker/marketer services on the distribution system of Equitable Gas Company, LLC ("Equitable").

SYR has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that SYR does not need a bond or other financial security requirement to provide these services to Equitable's customers.

If the creditworthiness requirement or Equitable's exposure to SYR changes in the future, Equitable may deem it appropriate to require SYR to provide a bond or other financial instrument.

Should you have any additional questions or concerns regarding a bond or other financial security instruments of Equitable, please do not hesitate to contact me at (412) 395-3216.

Sincerely,

Thomas P. Wiggers Director, Gas Supply



A NiSource Company

July 30, 2012

A. Parks Cobb, Jr. CEO SYR Solutions, L.P. 14027 Memorial Drive, #425 Houston, TX 77079

Dear Mr. Cobb:

We are pleased that SYR Solutions, L.P. ("SYR") 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, SYR 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. SYR has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that SYR 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 SYR changes in the future, Columbia Gas might deem it appropriate to require SYR to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4996 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

Tom Heckathorn

5/2 CORCA

Director, Transportation and Supplier Services

Attachment 7

Resumes of Key Personnel

RECEIVED

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SECRETARY'S SUB-



A. Parks Cobb, Jr.

Parks Cobb is the founder and CEO of SYR Solutions, L.P. He has over 45 years of professional experience with over 36 years in the energy industry, including 15 years in retail and wholesale electricity purchase and sale in the U.S and the Asia-Pacific region. For five years prior to SYR, he was a founder and minority owner of a private retail electric provider in Texas where he negotiated wholesale power purchase agreements, bought wholesale electricity to hedge the company's retail customer portfolio, developed pricing scenarios for large retail customers, and closed retail sales with a variety of large commercial and industrial customers. Prior to 2001 and for a period of over 26 years, he was a senior executive with two major electric utility companies operating in the U.S. and the Asia-Pacific Region. Most significant was a 25 year career with Duke Energy, where he held key positions in both regulated and unregulated operations including ten years in engineering and management on the regulated side and fifteen years in unregulated businesses including founder and president or executive vice president of three unregulated subsidiaries. As the senior Duke executive in these subsidiaries, he was a member of Duke's 40-person officer team during the period when Duke was consistently voted the best utility company in the U.S. by Fortune and other publications. His last assignment at Duke was a five-year term as Managing Director of Duke Energy Asia based in Hong Kong, where he established and managed Duke's project development and acquisition activities in Asia and Australia. Besides the U.S., he has extensive experience in deregulated electricity markets in China, Indonesia, the Philippines, and Australia, where Duke acquired or developed over \$300 million in power projects.



Samantha Wright

Samantha Wright is the Manager of Contracts and Pricing for SYR. Besides responsibilities for pricing and contract administration, she also conducts initial and renewal sales to businesses of all sizes. She has fourteen (14) years of experience in sales, marketing, and administration and joined SYR in early 2007. For three years prior to SYR, she was Sales and Marketing Coordinator for OEM Power Systems, a Rowan Companies subsidiary, where she worked in the sales department compiling sales quotes, assisting in quote tracking, receipt of purchase orders, review of purchase orders to original quote provided to customer, inputting orders into MRP system and distributing new orders and associated change orders to appropriate departments. She also organized and managed all aspects of OEM's industry events, trade shows and conferences, domestic and international, as well as worked with its sister companies for such events. For four years prior to OEM, she worked for Criterion Catalysts & Technologies L.P., a subsidiary of Shell Oil Products, where she was responsible for organizing and managing worldwide industry, customer, and internal events, developing the corporate conference marketing plan and budget, managing travel for the sales department, developing and maintaining a competitive database for sales and technical service departments, and was trained as an emergency and first aid "first responder" in the workplace and received ISO 9000 training in sales and customer service. Prior to Criterion, she was Director of Catering at major clubs and hotels in the Philadelphia, PA and Houston, TX areas.

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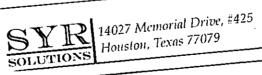
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