

# FTRenergyservices

Andrea Martino  
Paralegal  
[amartino@criusenergy.com](mailto:amartino@criusenergy.com)

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MAR 20 2013

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

January 9, 2013

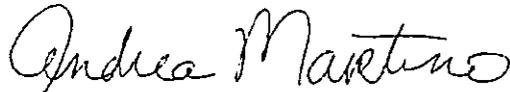
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
Attn: Jeanine Snyder, Bureau of Technical Utility Services

Re: FTR Energy Services Application for Natural Gas Supplier License  
(Docket No. A-2012-2318216)

Dear Ms. Snyder:

FTR Energy Services respectfully submits the enclosed responses to your data request for your review. Please let me know if there are any further questions with respect to FTR Energy Services' Application for a Natural Gas Supplier License.

Sincerely,



Andrea Martino

Docket No. A-2012-2318216  
FTR Energy Services, LLC  
Data Request Responses

1. **Question 1 - You state that FTR Energy Services, LLC (FTR) has no predecessors. However, the application continues on stating that FTR Energy Services was formerly Viridian Energy NG, LLC and had FERC market based rate authority and was licensed in the state of Ohio to sell electricity but Viridian Energy NG never operated and changed its name to FTR Energy Services. Is FTR now operating in Ohio? Furthermore, in Question #6 it states that Viridian Energy PA is currently marketing electricity (A-2009-2145794) and natural gas (A-2010-2203042) in the Commonwealth of PA. Please explain the relationship between FTR Energy Services LLC and Viridian Energy PA. What is the difference between FTR Energy Services LLC and Viridian Energy PA? Is this duplication of services? In addition, supply an organizational structure chart with the relationships of all of these companies and include Regional Energy Holdings Inc.**

Response: FTR Energy Services is currently operating in Ohio. It is correct that while Viridian Energy NG LLC had a license; it never operated or enrolled a customer in any state including Ohio. Viridian Energy NG's name was changed on June 7, 2012 to FTR Energy Services LLC. See Exhibit A.

Viridian Energy PA LLC is a subsidiary of Crius Energy LLC and sells electricity and natural gas in deregulated states including PA. FTR Energy Services LLC is also a subsidiary of Crius Energy LLC and sells electricity and natural gas in deregulated states. Viridian Energy PA sells energy through its network of independent contractors who sell energy to their family and friends. FTR Energy Services was formed as part of an exclusive marketing partnership with Frontier Communications. FTR Energy Services sells energy to Frontier Communication customers. Because they use different sales channels they generally do not overlap. FTR and Viridian are affiliated companies. Please see the Crius Energy Org Chart attached as Exhibit B.

By way of further explanation attached as Exhibit C is a letter to the Commission dated October 5, 2012 providing notice of a material change in information previously provided which provides further explanation.

2. **Question #3(b) - There is no name, address or phone number for the registered agent in Pennsylvania. Please send in an amended page 4.**

Response: See Exhibit D attached.

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- 3. Question #17 (a) - Please provide an organization structure including parent, affiliated or subsidiary companies.**

Response: See Exhibit E attached.

- 4. Question #17(a) - You provided a copy of Regional Energy Holdings Inc.'s financials. While FTR may be an affiliate, it still should have some financial data. Please provide FTR's financials.**

Response: FTR has no historical financial data to provide. FTR has not operated in any state before November 1, 2012.

- 5. Question #17(b) - Please provide proof of compliance with bonding/credit requirements for each Natural Gas Distribution Company (NGDC) you are proposing to provide service in. This requirement is designated by each NGDC and can commonly be found in the NGDC supplier tariff (see attached example from UGI bonding requirement letter).**

Response: See Exhibit F attached.

- 6. Questions #19 thru 24 – Please send amended pages 12 and 13 and answer each question with either agree or disagree and initial each question.**

See Exhibit G attached.

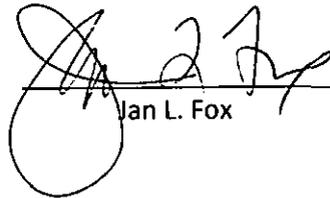
- 7. Appendix C Newspaper Publications – Because FTR is proposing to serve customers throughout the Commonwealth you will also need to publish in the Johnstown Tribune and Erie Times news. Please forward proofs of publications for these two newspapers.**

Response: See Exhibit H attached containing proofs of publication attached from the Johnstown Tribune Democrat and the Erie Times News.

VERIFICATION

State of Connecticut  
County of Fairfield

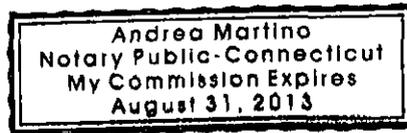
I, Jan L. Fox hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S § 4904 (relating to unsworn falsification to authorities).

  
\_\_\_\_\_  
Jan L. Fox

Subscribed and sworn to before me

this 9<sup>th</sup> day of January 9, 2013

  
\_\_\_\_\_  
Notary Public



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**Exhibit A**

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STATE OF NEVADA

*ROSS MILLER*  
Secretary of State



*SCOTT W. ANDERSON*  
Deputy Secretary  
for Commercial Recordings

OFFICE OF THE  
SECRETARY OF STATE

**Certified Copy**

June 7, 2012

**Job Number:** C20120607-1200  
**Reference Number:**  
**Expedite:**  
**Through Date:**

The undersigned filing officer hereby certifies that the attached copies are true and exact copies of all requested statements and related subsequent documentation filed with the Secretary of State's Office, Commercial Recordings Division listed on the attached report.

<b>Document Number(s)</b>	<b>Description</b>	<b>Number of Pages</b>
20120403880-58	Amendment	1 Pages/1 Copies



Respectfully,

A handwritten signature in black ink, appearing to read "Ross Miller".

ROSS MILLER  
Secretary of State

Certified By: Richard Sifuentes  
Certificate Number: C20120607-1200  
You may verify this certificate  
online at <http://www.nvsos.gov/>

**Commercial Recording Division**  
202 N. Carson Street  
Carson City, Nevada 89701-4069  
Telephone (775) 684-5708  
Fax (775) 684-7138



**ROSS MILLER**  
 Secretary of State  
 204 North Carson Street, Suite 1  
 Carson City, Nevada 89701-4820  
 (775) 684-5708  
 Website: www.nvsos.gov



\*091201\*

**Amendment to  
 Articles of Organization**  
 (PURSUANT TO NRS 86.221)

Filed in the office of  <i>[Signature]</i> Ross Miller Secretary of State State of Nevada	Document Number
	20120403880-58
	Filing Date and Time
	06/07/2012 9:45 AM
	Entity Number
	E0401472011-7

USE BLACK INK ONLY - DO NOT HIGHLIGHT

ABOVE SPACE IS FOR OFFICE USE ONLY

**Certificate of Amendment to Articles of Organization  
 For a Nevada Limited-Liability Company  
 (Pursuant to NRS 86.221)**

1. Name of limited-liability company:

Viridian Energy NG, LLC

2. The company is managed by:  Managers OR  Members  
(check only one box)

3. The articles have been amended as follows: (provide article numbers, if available)\*

Article 1 is amended as follows:  
 The name of the limited liability company is PTR Energy Services, LLC.

4. Effective date and time of filing: (optional) Date: \_\_\_\_\_ Time: \_\_\_\_\_  
(must not be later than 90 days after the certificate is filed)

5. Signature (must be signed by at least one manager or by a managing member):

X *[Signature]*  
 Signature

\* 1) If amending company name, it must contain the words "Limited-Liability Company," "Limited Company," or "Limited," or the abbreviations "Ltd.," "L.L.C.," or "L.C.," "LLC" or "LC." The word "Company" may be abbreviated as "Co."  
 2) If adding managers, provide names and addresses.

**FILING FEE: \$175.00**

**IMPORTANT:** Failure to include any of the above information and submit with the proper fees may cause this filing to be rejected.  
 This form must be accompanied by appropriate fees.

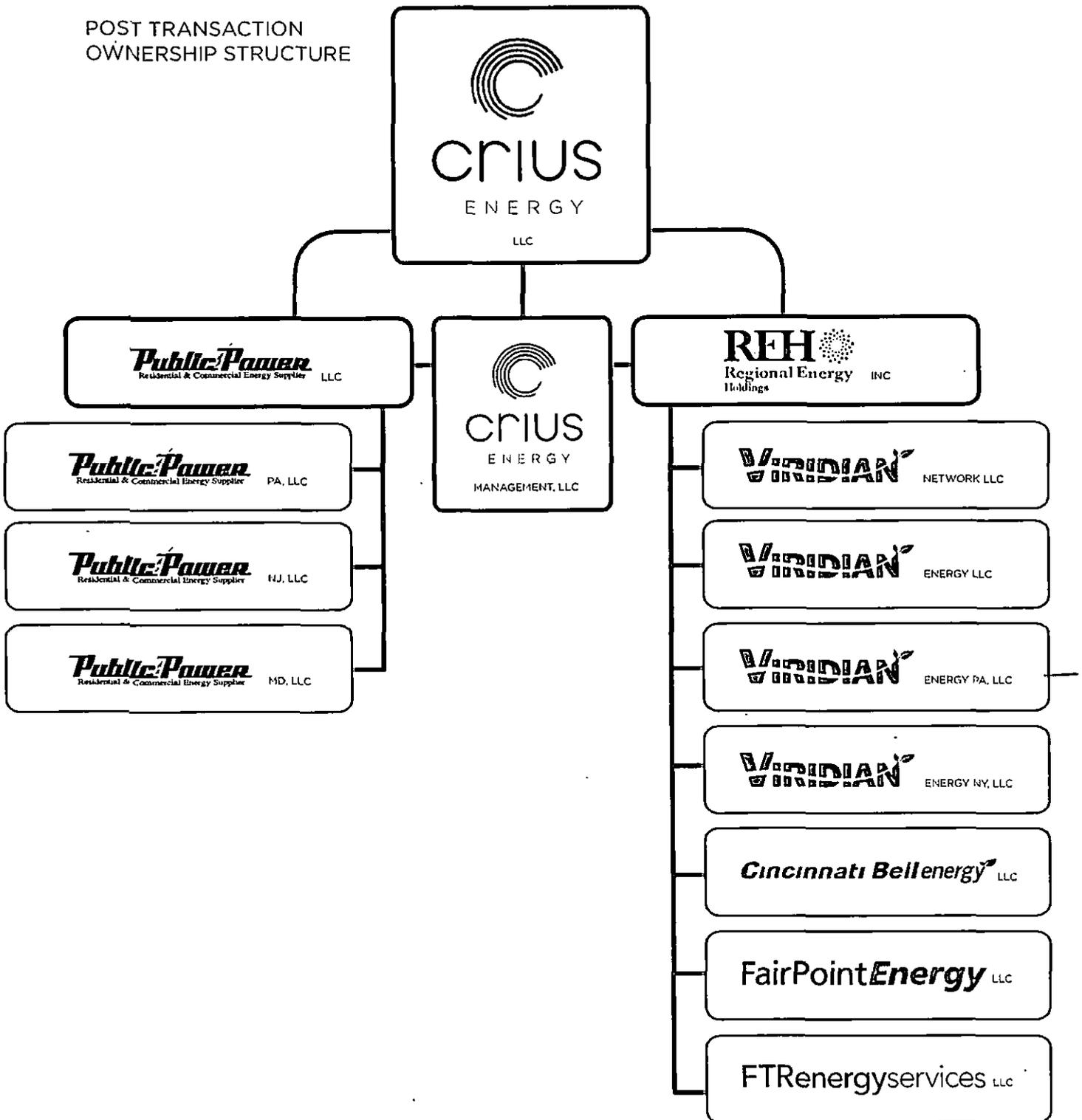
**Exhibit B**

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

POST TRANSACTION  
OWNERSHIP STRUCTURE



**Exhibit C**

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Jan L. Fox  
Vice President and General Counsel  
jfox@viridian.com | [Viridian.com](http://Viridian.com)

October 5, 2012

Pennsylvania Public Utility Commission  
Rosemary Chiavetta, Secretary  
Keystone Building, 2nd Floor Room N201  
Harrisburg, PA 17120

Re: Viridian Energy PA LLC, Docket No. A-2010-220342

Dear Secretary Chiavetta:

Viridian Energy PA LLC ("Viridian") was licensed as a Natural Gas Supplier ("NGS") in the captioned proceeding on January 13, 2011. Viridian is submitting this letter to comply with Section 62.105 of the regulations of the Pennsylvania Public Utility Commission (the "Commission"). Section 62.105(a) requires an NGS to inform the Commission of a material change in the information provided in the NGS's license application while the licensee is operating in the Commonwealth. Section 62.105(b) requires an NGS to notify the Commission, within thirty days, of any material changes in the NGS's organizational structure or operation.

As a result of a September 18, 2012 Exchange Transaction among Public Power, LLC, Viridian's parent, Regional Energy Holdings, Inc. ("REH"), and Crius Energy LLC ("Crius"), certain changes have occurred that may trigger the reporting requirements of Sections 62.105(a) and (b). This letter discloses those changes and describes the Exchange Transaction in more detail.

***Section 62.105(a)***

Turning first to Section 62.105(a), Viridian notifies the Commission that its business address has changed, effective October 1, 2012, to 1055 Washington Blvd., 7th Floor, Stamford, CT 06901.

***Section 62.105(b)***

Turning to Section 62.105(b), Viridian's upstream organizational structure has changed. Specifically, on September 18, 2012, REH, Public Power, LLC ("Public Power") and Crius implemented an Exchange Agreement, through which each of the members holding ownership interests in Public Power and the stockholders owning shares of REH contributed a portion (approximately 75 percent) of their interests in Public Power and REH to Crius, each in exchange for 50 percent of the ownership interests in Crius. The Public Power members and the REH stockholders retained 25 percent of their respective ownership



interests in Public Power and REH. The Exchange Agreement, thus, effected a transfer of 75 percent of the ownership interests in Public Power to Crius, and the remaining 25 percent of REH is owned by the same entities that owned it prior to the Exchange Agreement. Charts illustrating the pre- and post-transaction ownership structures are attached as Attachment No. 1.

In addition, as a result of the Exchange Transaction, Viridian is affiliated with the following electric and natural gas suppliers who supply electricity and/or natural gas at retail in the enumerated states:<sup>1</sup>

ENTITY	STATES	
	ELECTRIC	NATURAL GAS
Viridian Energy, LLC	CT MA	---
Viridian Energy NY LLC	NY	NY
Cincinnati Bell Energy, LLC (f/k/a Viridian Energy NJ LLC)	OH	OH
FTR Energy Services, LLC (f/k/a Viridian Energy NG LLC) <sup>2</sup>	OH NY	OH NY IN
Fairpoint Energy, LLC (f/k/a Viridian Energy MD LLC)	ME NH	---
Public Power, LLC (CT)	CT OH IL NY MA D.C. RI	NY
Public Power & Utility, Inc.	MA	---
Public Power & Utility of New Jersey, LLC (NJ)	NJ	NJ
Public Power & Utility of Maryland, LLC (MD)	MD	---
Public Power, LLC (PA)	PA	---

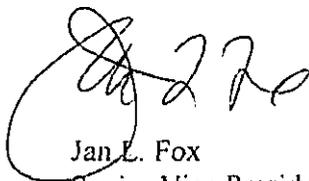
<sup>1</sup> Viridian Energy PA LLC provides retail electric service in Delaware, the District of Columbia, Illinois, Maryland, New Jersey and Pennsylvania, and retail natural gas service in New Jersey, New York and Pennsylvania.

<sup>2</sup> FTR Energy Services submitted an application for an Electric Generation Supplier license in Pennsylvania on July 11, 2012 in Docket No. A-2012-2314724.



If you have any questions concerning this update to Viridian's Application, please contact the undersigned at (203) 517-0130.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jan L. Fox". The signature is stylized with a large loop at the beginning and a long horizontal stroke.

Jan L. Fox  
Senior Vice President and General Counsel

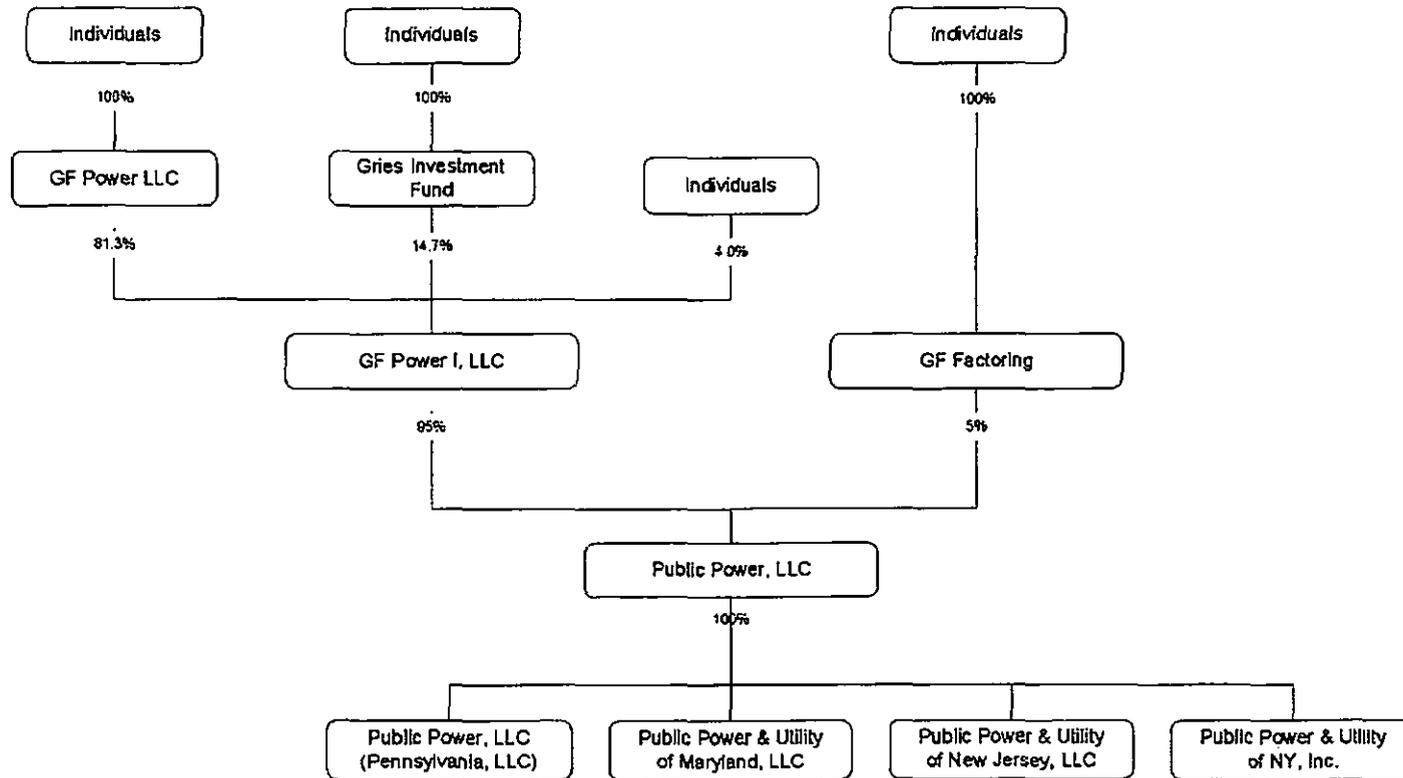
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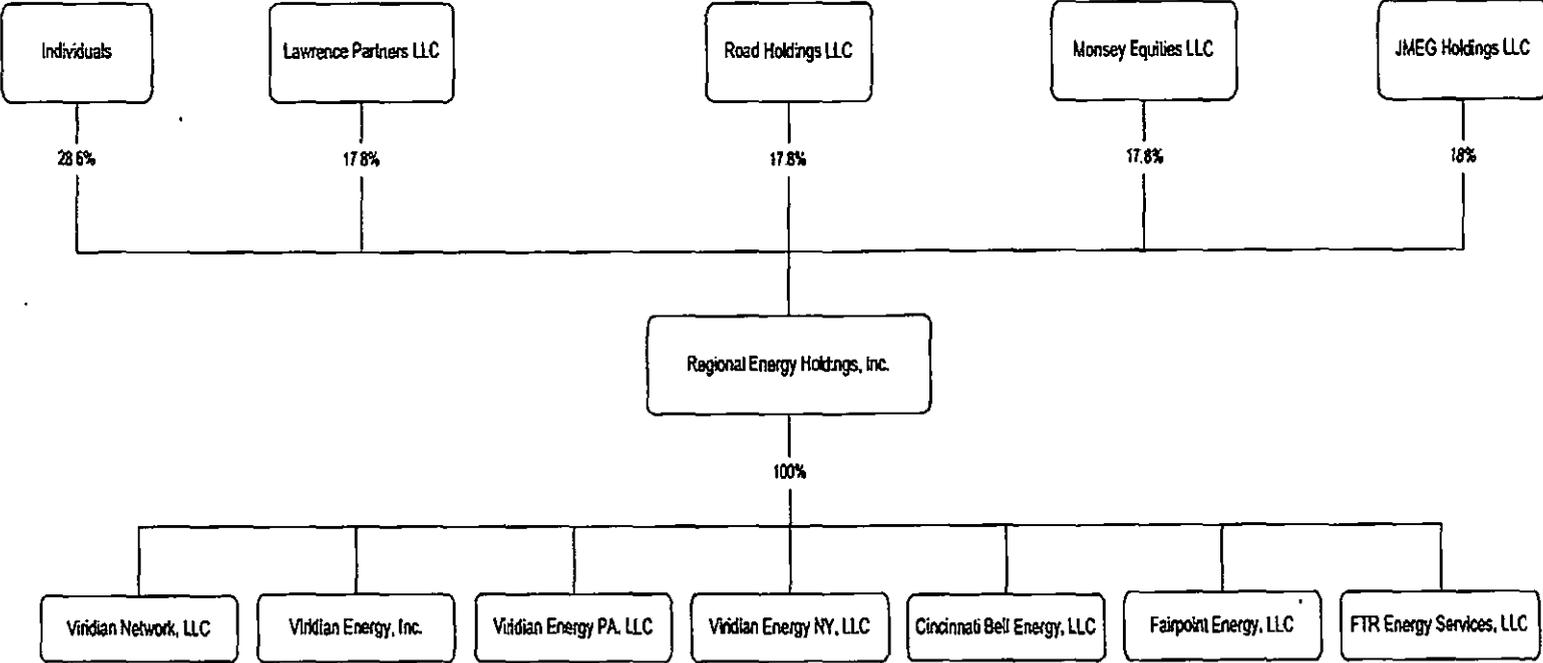
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**ATTACHMENT NO. 1**

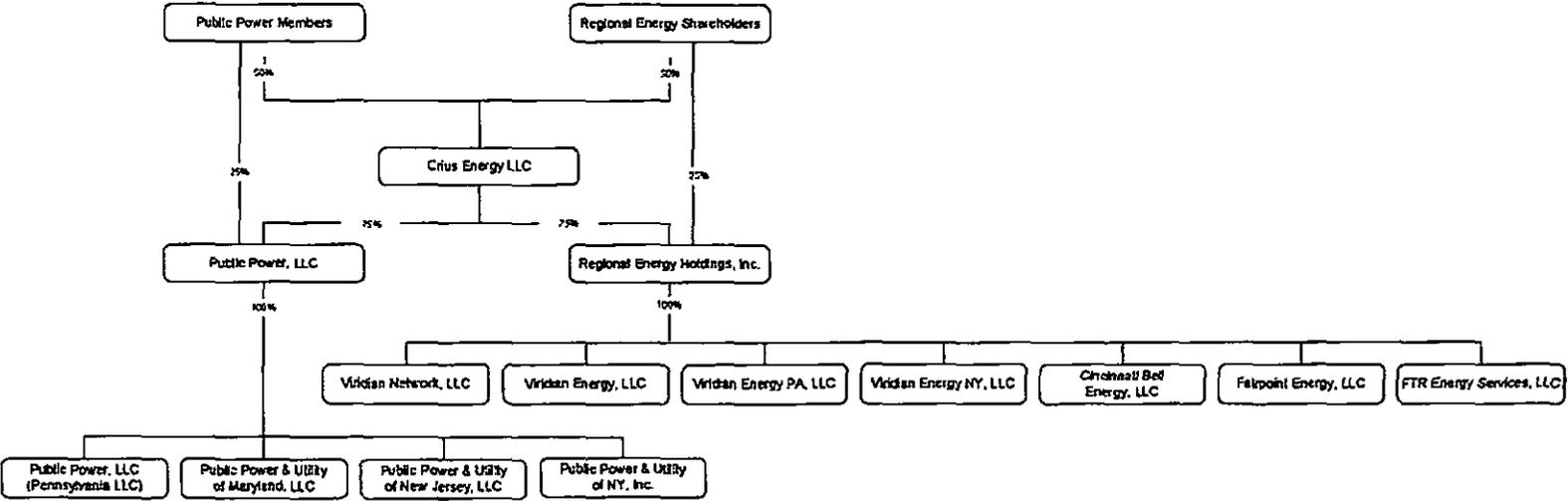
## Public Power, LLC Pre-Transaction Ownership Structure



Regional Energy Holdings, Inc.  
Pre-Transaction Ownership Structure



### Post-Exchange Ownership Structure



**Exhibit D**

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SECRETARY'S BUREAU

3.a. **ATTORNEY:** If applicable, the name, address, telephone number, and FAX number of the Applicant's attorney are:

Jan L. Fox  
Senior Vice President and General Counsel  
FTR Energy Services, LLC  
64 North Main Street  
Norwalk, Connecticut 06854  
(t) 203.517.0130  
(f) 203.738.1044  
Email: jfox@viridian.com

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 North Second Street, Suite 401  
Harrisburg, PA 17101  
Phone: 1-800-767-1553  
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 of State pursuant to 54 Pa. C.S. §311, Form PA-953.

**OR**

The Applicant will not be using a fictitious name.

5. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:** (select and complete appropriate statement)

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)

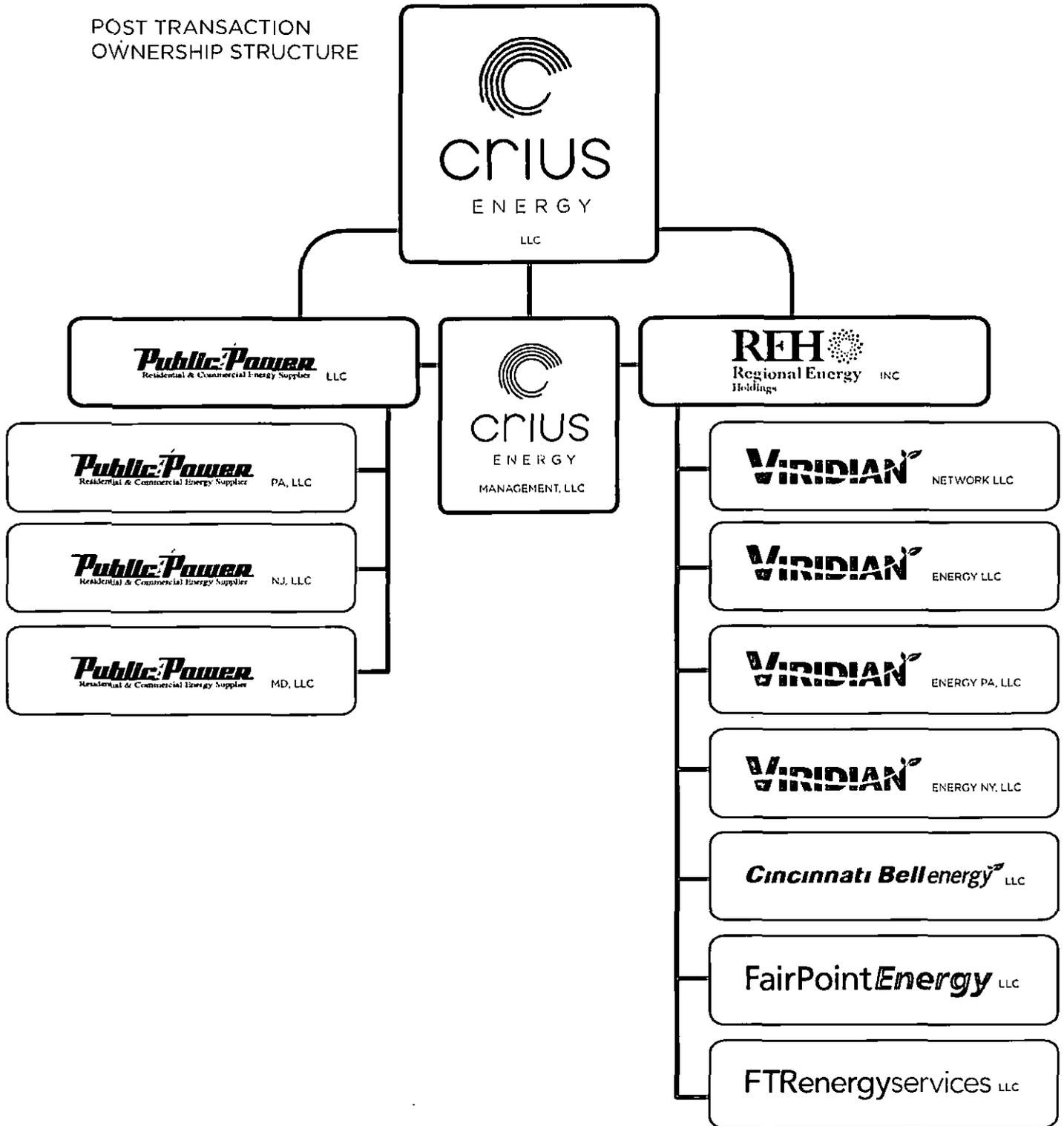
**Exhibit E**

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POST TRANSACTION  
OWNERSHIP STRUCTURE



**Exhibit F**

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UGI Utilities, Inc.  
2525 North 12th Street  
Suite 360  
Post Office Box 12677  
Reading, PA 19612-2677  
(610) 796-3400 Telephone

December 11, 2012

Martine Trinka  
Counsel  
FTR Energy Services, LLC  
64 North Main Street  
Norwalk, CT 06854

RE: UGI Financial Security Requirements

Dear Ms. Trinka,

UGI Utilities, Inc. ("UGIU") has reviewed the financial information of FTR Energy Services, LLC ("FTR"). Based on this review and the requirement that FTR must post security as specified in the UGI Utilities Inc. – Gas Division ("UGI"), UGI Penn Natural Gas Inc. ("PNG") and/or UGI Central Penn Gas Inc. ("CPG") Supplier Coordination Tariffs before it serves customers on the UGI, PNG and/or CPG distribution systems, UGIU has determined that FTR has demonstrated adequate creditworthiness to satisfy any costs UGI, PNG and/or CPG may incur in the event any of the UGI Companies operate as a supplier of last resort due to a default on the part of FTR.

This determination may change in the event there is a material deterioration in the financial condition of FTR, if FTR's obligations to UGI, PNG and/or CPG exceed the amount of the financial security provided, if the financial security is withdrawn or is deemed to be null and void or inadequate due to the material financial deterioration of any guarantor, or if FTR fails to abide by the terms and conditions of the UGI, PNG and/or CPG Gas Tariffs and the UGI, PNG and/or CPG Natural Gas Supplier Coordination Tariffs.

Please feel free to contact me with any additional questions that you may have. I can be reached at (610) 796-3520.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Lahoff". The signature is fluid and cursive.

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



An Exelon Company

December 13, 2012  
PECO - Exelon Corporation  
Energy Acquisition  
2301 Market Street  
Philadelphia, PA. 19101

Ms. Martine Trinka  
Regional energy/FTR Energy Services/Criusenergy  
Counsel  
[mtrinka@criusenergy.com](mailto:mtrinka@criusenergy.com)

In compliance with your request of December 11th, 2012, PECO Energy Acquisition is providing this notification letter that Regional Energy, the Parent Company, of FTR Energy Services, has met the creditworthiness business requirement involved with the Pennsylvania Gas Choice - Low Volume Transportation program; pursuant to the receipt of an executed Parent Guaranty of \$35,000.00. PECO will hold any surety to cover potential obligations to PECO and other system costs that could result from failure of a Supplier to meet its competitive Natural Gas Supply service delivery obligations.

Please note, although the creditworthiness requirements were met, as referenced within Section 7.13 (Creditworthiness of a Natural Gas Supplier (NGS) Serving Low Volume Transportation Customers) of the Gas Service Tariff, PECO has the right to re-assess the creditworthiness of the company if PECO has any reason to suspect a change in the marketer's financial condition.

If you should have any questions regarding this matter, please contact the Electric & Gas Choice Hotline at 215-841-3700.

Sincerely,

  
Carol Reilly  
Manager  
Energy Acquisition



375 North Shore Drive, Suite 600  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](http://www.peoples-gas.com)

November 14, 2012

FTR Energy Services, LLC  
1055 Washington Boulevard, 7th Floor  
Stamford, CT 06901  
Attn: Andrea Martino

Dear Ms. Martino:

This letter serves as notification that Peoples Natural Gas Company does not require FTR Energy Services, LLC 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.Petrichевич@peoples-gas.com](mailto:Lynda.W.Petrichевич@peoples-gas.com).

Sincerely,

A handwritten signature in cursive script that reads "Lynda W. Petrichевич".

Lynda W. Petrichевич  
Manager, Rates and Regulatory Affairs  
Peoples Natural Gas Company LLC



***National fuel***

---

November 8, 2012

FTR Energy Service, LLC  
1055 Washington Boulevard, 7<sup>th</sup> Floor  
Stamford, CT 06901

Attn: Andrea Martino

RE: Security Requirement for FTR Energy Service, LLC

Dear Andrea:

Pursuant to 66 Pa. C. S. § 2208 (c), an applicant for a natural gas supplier license in the Commonwealth of Pennsylvania must furnish security to each utility where the supplier will do business to ensure the financial responsibility of such natural gas supplier. To this end, National Fuel Gas Distribution Corporation ("National Fuel") has performed a credit review and analysis of FTR Energy Service, LLC ("FTR") and has determined that FTR must post a security deposit in cash, or a form of security acceptable to National Fuel, to operate as a supplier on National Fuel's system.

FTR's security requirement to serve Pennsylvania customers is dependent on the type of transportation service utilized by FTR. There is no Natural Gas Supplier (NGS) security requirement for customers that will be enrolled in National Fuel's Purchase of Receivable (POR) program. As such, FTR will not be required to post security for customers enrolled in the POR program. A security deposit will be required for transportation customers not enrolled in the POR program.

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

Yours truly,

Nathan E. Barnes  
Transportation Services Department

# Philadelphia Gas Works



Raymond M. Snyder – Vice President, Gas Management  
800 W. Montgomery Avenue, Philadelphia, PA 19122  
Telephone: (215) 684-6405 Fax: (215) 684-6602

November 7, 2012

Ms. Andrea Martino FTR Energy Services, LLC  
1055 Washington Blvd., 7<sup>th</sup> Floor  
Stamford, CT 06901

Re: Security Requirement for FTR Energy Service, LLC

Dear Andrea:

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

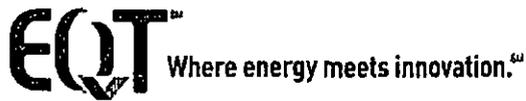
Based upon your representations, Philadelphia Gas Works has determined that, at this time, FTR Energy Service, LLC, does not need to post a bond or other form of security to operate in its service territory. If the services provided by FTR Energy Service, LLC, should change, Philadelphia Gas Works reserves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

If you have any questions concerning the foregoing, please contact me at 215-684-6405.

Kind Regards,

A handwritten signature in black ink, appearing to read "Raymond M. Snyder", written over the "Kind Regards," text.

Raymond M. Snyder  
VP, Gas Management



EQT Plaza  
625 Liberty Avenue, Suite 1700  
Pittsburgh, PA 15222  
(412) 395-3915 Fax: (412) 553-7890

December 7, 2012

Martine Trinka  
Crius Energy, LLC  
1055 Washington Blvd.  
7<sup>th</sup> Floor  
Stamford, CT 06901

Dear Mrs. Martino:

Equitable Gas Company LLC ("Equitable Gas") is aware that FTR Energy Services, LLC has applied with the Pennsylvania Public Utility Commission to supply natural gas services within Equitable Gas' service market.

In that FTR Energy Services, LLC has met Equitable Gas' credit requirements and intends to supply natural gas and provide natural gas aggregating, brokering and consulting services to end-users on behalf of third party suppliers, Equitable Gas will not require FTR Energy Services, LLC to provide credit assurances to solicit natural gas commodity and services in our service area. Equitable Gas' position is based upon the satisfactory creditworthiness of Regional Energy Holdings, Inc.

If you have any questions, please contact Matthew Morris at 412-395-3915.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Morris', is written over a horizontal line.

Matthew Morris



# VALLEY ENERGY

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

November 7, 2012

Andrea Martino, Paralegal  
FTR Energy Services, LLC  
1055 Washington Blvd., 7<sup>th</sup> Floor  
Stamford, CT 06901

Dear Ms. Martino:

We understand that FTR Energy Services, LLC 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 FTR Energy Services, LLC intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that FTR Energy Services, LLC 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 FTR Energy Services, LLC 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

**Exhibit G**

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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.

Michael Fallquist, President, CEO

Roop Bhullar, CFO, Treasurer

Mike Chester, VP Operations

Betsy Webb, Vice President Regulatory Affairs

Jan Fox, Vice President, General Counsel, Secretary

Copies of each officer's resume is included as Attachment F.

- A copy of any Federal energy license currently held by the Applicant.
- Proposed staffing and employee training commitments.
- Business plans.

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. – Applicant agrees. JLF

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. – Applicant agrees. JLF

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. – Applicant agrees. JLF

**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. – Applicant agrees. JLF

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. – Applicant agrees. JVF

24. **FEE:** The Applicant has enclosed the required initial licensing fee of \$350.00 payable to the Commonwealth of Pennsylvania. – Applicant agrees. JVF

Applicant: JVF

By: Jan L. Fox

Title: Senior VP + General Counsel

**Exhibit H**

**RECEIVED**

MAR 20 2013

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PROOF OF PUBLICATION  
In  
THE ERIE TIMES-NEWS  
COMBINATION EDITION

FTR ENERGY SERVICES LLC  
64 N MAIN ST  
NORWALK CT 06854

REFERENCE: L0005639  
2062287 PUC NOTICE- GAS

STATE OF PENNSYLVANIA)  
COUNTY OF ERIE ) SS:

Debra McGraw, being duly sworn, deposes and says that: (1) 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: 06/28

TOTAL COST: 294.00 AD SPACE: 7.000 INCH  
FILED ON: 06/28/12

**PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE**  
Application of FTR Energy Services, LLC For Approval To Offer, Render, Furnish Natural Gas Supply Services as a Marketer/ Broker or Aggregator Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.  
FTR Energy Services will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier of natural gas and (2) an aggregator engaged in the business of providing natural gas supply services. FTR Energy Services, LLC proposes to sell natural gas 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 FTR Energy Services, LLC 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 FTR Energy Services, LLC attorney at the address listed below.  
**FTR Energy Services, LLC**  
84 North Main Street  
Norwalk, CT 06854  
1-877-811-7023

Sworn to and subscribed before me this

28<sup>th</sup> day of June 2012 Affiant: Debra McGraw

NOTARY: Barbara J. Moore

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Barbara J. Moore, Notary Public  
City of Erie, Erie County  
My Commission Expires March 23, 2016  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

**COMMONWEALTH OF PENNSYLVANIA** }  
*County of Cambria* } SS

**PENNSYLVANIA  
PUBLIC UTILITY  
COMMISSION**

**NOTICE**

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send copies of any protest to FTR Energy Services, LLC attorney at the address listed below.

By and through Counsel:  
Jan Fox  
FTR Energy Services, LLC  
64 North Main Street  
Norwalk, CT 06854  
1-877-811-7023

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Johnstown Pa. in the County of Cambria, and Commonwealth of Pennsylvania and copy of a notice in the above matter published in said publication in the regular issues Democrat, Johnstown, PA, on June 28, 2012; and that the Affiant is not interested in notice or advertising and that all of the allegations as to time, place and character of

*Mary Anne Rizzo*  
\_\_\_\_\_  
**STATEMENT OF ADVERTISING COSTS**

Swor  
10th

*Jan Fox* *OK*

57 Lines @	\$2.50 per line	142.50
0.00 Inches @	\$25.00 per inch	0.00
Notary Fee		5.00
Clerical Fee		2.50
<b>Total Cost</b>		<b>150.00</b>

**COMMONWEALTH OF PENNSYLVANIA**  
Notarial Seal  
Vivian Ohs, Notary Public  
City of Johnstown, Cambria County  
My Commission Expires Dec. 6, 2012  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

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 \_\_\_\_\_