



UTILITY
RATES
ANALYSTS

220 S. 17th Street
Camp Hill, PA 17011
(717) 761-5150

June 3, 2013

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
PO BOX 3265
Harrisburg, PA 17105-3265

To Whom It May Concern:

Attached you will find the completed License Application for URA, Inc. as required for URA, Inc. to become a licensed gas supplier. This includes supporting documents and all applicable attachments.

URA proposes to act as a consultant to our clients and assist them in obtaining pricing and reviewing contracts from various suppliers. We will not be taking title to any gas purchases nor will we be collecting any taxes.

URA, Inc. is a Subchapter S-Corporation (EIN# 45-4037777) formed in December, 2011. We hold an Electric Supply License #A-2012-2303321.

We propose to run the PUC notice as requested in newspapers covering the areas of Harrisburg, (UGI Companies), York, (Columbia Gas Company) and Norristown (PECO) as directed by you.

Please contact me at (717) 761-5150 or Steve@utilityratesanalysts.com or Mike Walker Mike@utilityratesanalysts.com, or in writing at the address above.

Sincerely,

Steve Cantore
Utility Rates Analysts

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of _____ URA, Inc. _____, a/k/a _____ Utility Rates Analysts _____, for approval to offer, render, furnish, or as a(n) Broker/Marketer to the public in the Commonwealth of Pennsylvania.

To the Pennsylvania Public Utility Commission:

1. **IDENTITY OF THE APPLICANT:** The name, address, telephone number, and FAX number of the Applicant are:

**URA, Inc.
220 South 17th St
Camp Hill, PA 17011
Phone 717-761-5150
Fax 888-838-9009**

Please identify any predecessor(s) of the Applicant and provide other names under which the Applicant has operated within the preceding five (5) years, including name, address, and telephone number.

Utility Rates Analysts, same address, phone

2. a. **CONTACT PERSON:** The name, title, address, telephone number, and FAX number of the person to whom questions about this Application should be addressed are:

**Steve Cantore, President, 220 South 17 St, Camp Hill PA 17011
Phone 717-648-6239, Fax 888-838-9009**

- b. **CONTACT PERSON-PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY:** The name, title, address telephone number and FAX number of the person with whom contact should be made by PEMA:

**Steve Cantore, President, 220 South 17 St, Camp Hill PA 17011
Phone 717-648-6239, Fax 888-838-9009**

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

N/A

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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:

N/A

4. **FICTITIOUS NAME:** (select and complete appropriate statement)

X The Applicant will be using a fictitious name or doing business as ("d/b/a"):

We do not have a filing with the Commonwealth but before we became incorporated in Dec 2011, we did business as the sole proprietorship, Utility Rates Analysts and many of our clients know us by this name.

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)

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

Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.

- * If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

or

X 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.

Stephen Cantore, President, 220 South 17th St, Camp Hill PA 17011
Michael R. Walker, Secretary/Treasurer, 18 Triplett Ct, Dillsburg PA 17019

The Applicant is incorporated in the state of _____ **Pennsylvania** _____.

6. **AFFILIATES AND PREDECESSORS WITHIN PENNSYLVANIA:** (select and complete appropriate statement)

- Affiliate(s) of the Applicant doing business in Pennsylvania are:

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:
(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:
(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.

- X 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-2012-2303321

**PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU**

Articles of Incorporation-For Profit
(15 Pa.C.S.)

Entity Number

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

Name

Business Filings Incorporated

Address

8040 Excelsior Dr., Ste 200

City

Madison

State

Wisconsin

Zip Code

53717

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

Fee: \$125

F Commonwealth of Pennsylvania
ARTICLES OF INCORPORATION 4 Page(s)



T1133965025

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

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

URA, INC.

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

(a) Number and Street City State Zip County

428 Guthrie Road, Wayne, Pennsylvania 19087 Montgomery

(b) Name of Commercial Registered Office Provider County

c/o:

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

4. The aggregate number of shares authorized: 1000

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- X 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.

Utility Rates Analysts PUC license A-2009-2133996
220 South 17th St
Camp Hill PA 17011
717-761-5150 phone
888-838-9009 fax

The predecessor was not a jurisdictional public utility.

or

- The Applicant has no affiliates doing business in Pennsylvania or predecessors which have done business in Pennsylvania.

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

- The Applicant is presently doing business in Pennsylvania as a
- 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
 - X Other. (Identify the nature of service being rendered.)

Consulting firm that assists clients with tariff rate reviews, reducing utility costs, and obtaining refunds of incorrect charges and electric brokering.

or

- The Applicant is not presently doing business in Pennsylvania.

8. **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.
- X 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 the natural gas services which the Applicant proposes to offer.

Applicant proposes to act as a consultant in the review of tariff rates, reducing utility costs, obtaining refunds of incorrect charges and brokering/procurement of alternate natural gas suppliers on behalf of its clients.

10. **SERVICE AREA:** Provide each Natural Gas Distribution Company (NGDC) in which Applicant proposes to offer services.

UGI (including PNG, CPG), PECO, Columbia Gas

11. **CUSTOMERS:** Applicant proposes to initially provide services to:

- Residential Customers
- X Commercial Customers - (Less than 6,000 Mcf annually)
- X Commercial Customers - (6,000 Mcf or more annually)
- X Industrial Customers
- X Governmental Customers
- All of above
- Other (Describe):

12. **START DATE:** The Applicant proposes to begin delivering services upon **__approval/issue of license (asap)_**.

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:

<p>Valley Energy Inc. Robert Crocker 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: rcrocker@ctenterprises.org</p>	<p>National Fuel Gas Distribution Corp. David D. Wolford 6363 Main Street Williamsville, NY 14221 PH: 716.857.7483 FAX: 716.857.7479 email: wolfordd@natfuel.com</p>
<p>UGI Central Penn David Beasten 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3425 FAX: 610.796.3559</p>	<p>Peoples Natural Gas Company LLC Lynda Petrichevich 375 North Shore Drive, Suite 600 Pittsburgh, PA 15212 email: Lynda.w.petrichevich@peoples-gas.com PH: 412.208.6528 FAX: 412.208.6577</p>
<p>Peoples TWP LLC (Formerly T. W. Phillips) Andrew Wachter 375 North Shore Drive, Suite 600 Pittsburgh, PA 15212 PH: 724.431.4935 FAX: 724.287.5021 email: Andrew.Wachter@peoplestwp.com</p>	<p>UGI David Beasten 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3425 FAX: 610.796.3559</p>
<p>UGI Penn Natural David Beasten 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3425 FAX: 610.796.3559</p>	<p>Equitable Gas Company Jerald Moody 225 North Shore Drive Pittsburgh, PA 15212-5352 PH: 412.395.3209 FAX: 412.395.3335</p>
<p>PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 email: carlos.thillet@exeloncorp.com PH: 215.841.6452</p>	<p>Columbia Gas of Pennsylvania Inc. Thomas C. Heckathorn 200 Civic Center Drive Columbus, OH 43215 PH: 614.460.4996 FAX: 614.460.6442 email: theckathorn@nisource.com</p>
<p>Philadelphia Gas Works Douglas Moser 800 West Montgomery Avenue Philadelphia, PA 19122 email: douglas.moser@pgworks.com PH: 215.684.6899</p>	

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.

14. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix B to this application.
Attached
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. **N/A**
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.

Stephen Cantore, President
 220 South 17th St
 Camp Hill, PA 17011
 717-761-5150
 888-838-9009 Fax
steve@utilityratesanalysts.com

Michael Walker, Business Manager
 220 South 17th St
 Camp Hill, PA 17011
 717-761-5150
 888-838-9009 Fax
mike@utilityratesanalysts.com

- 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. – **See attached**

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.– **See Attached for 2012**
 - Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report. – **DUNS 12-577-3056 – See Attached**
 - 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. – **See Attached**
 - Audited financial statements – **See Attached for 2011 (when d/b/a sole proprietorship)**

- B. Applicant must provide the following information:

12:15 PM
05/29/13
Accrual Basis

URA, Inc.
Balance Sheet
As of December 31, 2012

	<u>Dec 31, 12</u>
ASSETS	
Current Assets	
Checking/Savings	
Integrity Bank Checking Account	167,570.41
Total Checking/Savings	<u>167,570.41</u>
Total Current Assets	<u>167,570.41</u>
TOTAL ASSETS	<u><u>167,570.41</u></u>
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Other Current Liabilities	
Payroll Liabilities	11,369.10
Retirement Plan Payable	43,500.96
Total Other Current Liabilities	<u>54,870.06</u>
Total Current Liabilities	<u>54,870.06</u>
Total Liabilities	54,870.06
Equity	
Opening Balance Equity	1,000.00
Retained Earnings	0.21
Net Income	111,700.14
Total Equity	<u>112,700.35</u>
TOTAL LIABILITIES & EQUITY	<u><u>167,570.41</u></u>

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05/29/13
Accrual Basis

URA, Inc.
Profit & Loss
January through December 2012

	<u>Jan - Dec 12</u>
Ordinary Income/Expense	
Income	
Interest Income	302.52
Sales Income	580,073.52
Uncategorized Income	106,771.07
Total Income	<u>687,147.11</u>
Gross Profit	687,147.11
Expense	
Advertising and Promotion	1,868.30
Automobile Expense	4,848.50
Bank Service Charges	69.00
Charitable Contributions	10,062.50
Commission	59,933.13
Computer and Internet Expenses	2,095.24
Health Insurance	22,835.44
Insurance Expense	3,594.00
Meals and Entertainment	769.82
Office Supplies	1,622.94
Payroll Expenses	396,385.75
Postage	132.55
Printing and Reproduction	490.05
Professional Fees	6,689.30
Rent Expense	898.04
SEP	56,576.96
Telephone Expense	4,892.14
Training Expense	149.00
Travel Expense	401.73
Uncategorized Expenses	1,132.58
Total Expense	<u>575,446.97</u>
Net Ordinary Income	<u>111,700.14</u>
Net Income	<u><u>111,700.14</u></u>

Utility Rates Analysts

D-U-N-S® Number:	12-577-3056	Location Type:	Single Location
Company Name:	Utility Rates Analysts	Subsidiary Status:	Non-Subsidiary
		Plant/Facility Size:	1,600 Sq Ft
Mail Address:	220 S 17th St Camp Hill, PA, USA 17011- 5909	Year Established:	1991
	View Map	Ownership:	Private
County:	Cumberland	Prescreen Score:	Low Risk
MSA:	Harrisburg-Carlisle		
Country Phone Code:	1		
Phone:	717-761-3150		
Employee Count: <i>(All Sites)</i>	3	Sales: <i>(All Sites)</i>	\$250,000 US (Actual)
Employment: <i>(Individual Sites)</i>	Current Year: 3	Sales: <i>(Individual Sites)</i>	\$250,000 US (Actual)
Executives:	Mr Steve Contino - Owner Add Decision Maker		
SIC Code(s):	87420000 - Management consulting services (Primary)		
Line of Business:	Management Consulting Services		
NAICS Code(s):	541611 - Administrative Management & General Mgmt Consulting Svcs (Primary)		

MARK A. MAGLIENTE

CERTIFIED PUBLIC ACCOUNTANT

428 GUTHRIE ROAD

WAYNE, PA 19087

(610) 265-1959

Stephen Cantore
D/B/A Utility Rates Analysts
220 South 17th Street
Camp Hill, PA 17011

I have compiled the accompanying statements of assets, liabilities, and owner's capital – income tax basis of Utility Rates Analysts (a sole-proprietorship), as of December 31, 2011, and the related statement of revenue and expenses – income tax basis for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The financial statements have been prepared on the basis of accounting, which is a comprehensive basis of accounting other than generally accepted accounting principles.

A compilation is limited to presenting in the form of financial statements information that is the representation of the owner. I have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

The owner has elected to omit substantially all of the disclosures ordinarily included in the financial statements prepared on the income tax basis of accounting. If the omitted disclosures were included in the financial statements, they might influence the user's conclusions about the Proprietorship's assets, liabilities, capital, revenues, and expenses. Accordingly, these financial statements are not designed for those who are not informed about such matters.



March 20, 2012

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Utility Rates Analysts
Statement of Assets, Liabilities, and Owner's Capital - Income Tax Basis
December 31, 2011

ASSETS

Current Assets		
Cash - checking		\$51,120
Property, Plant, and Equipment		
Office equipment	\$5,037	
Furniture & fixtures	3,424	
	<u>8,461</u>	
Accumulated depreciation	<u>(8,461)</u>	
		<u>0</u>
Total Assets		<u><u>\$51,120</u></u>

LIABILITIES & OWNER'S CAPITAL

Liabilities		\$0
Capital, Stephen Cantore		<u>51,120</u>
Total Liabilities and Owner's Capital		<u><u>\$51,120</u></u>

See the accountant's compilation report.

Utility Rates Analysts
Statement of Revenues and Expenses - Income Tax Basis
For the Year Ended December 31, 2011

REVENUE		\$761,236
EXPENSES		
Wages	\$123,496	
Payroll taxes	9,732	
Commissions	66,563	
Insurance - Employee Health	3,543	
Pension expense - employee	1,667	
Advertising	2,416	
Auto expense	5,857	
Travel expense	626	
Meals & entertainment	2,663	
Insurance	1,406	
Legal & accounting	950	
Office expense	584	
Rent expense	10,044	
Supplies	469	
Dues	101	
Telephone expense	4,793	
Computer purchase	1,690	
Office furniture purchase	2,041	
Utilities	441	
	<u>239,082</u>	
Total Expenses		<u>239,082</u>
Excess Revenue over Expenses		<u><u>\$522,154</u></u>

See the accountant's compilation report.

- 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 – See attached letters**
- Identify Applicant's chief officers including names and their professional resumes. – **See Attached**

Stephen Cantore, President, 220 South 17th St, Camp Hill PA 17011
Michael R Walker, Secretary/Treasurer, 18 Triplett Ct, Dillsburg PA 17019

- Provide the name, title, address, telephone number and FAX number of Applicant's custodian for its accounting records.

Mark Magliente, CPA, 428 Guthrie Rd, Wayne PA 19087
610-265-1959, markmagliente@verizon.net

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. – **See Attached**

Stephen Cantore, President, 220 South 17th St, Camp Hill PA 17011
Michael R Walker, Secretary/Treasurer, 18 Triplett Ct, Dillsburg PA 17019

- A copy of any Federal energy license currently held by the Applicant. **N/A - (PUC Electric License Attached)**
- **URA has been in existence since 1991. Stephen Cantore (President) originally worked in billing/accounting and meter reading for 7 years with a utility company. We have been auditing Pennsylvania utility bills since 1991 and are very knowledgeable of this industry. We have been brokering electricity since obtaining PUC license A-2009-2133996 in 2009 (transferred to license A-2012-2303321 in 2012 after we incorporated). We service mostly medium and large companies, such as hotels, manufacturers, commercial realty, etc. (approximately 160 existing clients)**

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.

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.

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 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.

May 20, 2013

Mike Walker
URA, Inc.
220 South 17th St.
Camp Hill, PA 17011

Dear Mr. Walker:

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

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

Sincerely,



Michele Caddell
Manager, Supplier Services

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UGI Utilities, Inc.
2525 North 12th Street
Suite 300
Post Office Box 12677
Reading, PA 19612-7677

(610) 796-3400 Telephone

May 15, 2013

Steve Cantore
URA, Inc.
220 S. 17th St.
Camp Hill, Pa. 17011

RE: UTILITY RATES ANALYSTS Inc. application to serve as a broker/marketer

Dear Mr. Cantore,

Based on email discussions with you, UGI Utilities Inc. ("UGIU") has concluded that UTILITY RATES ANALYSTS Inc. will not need to post security with UGI-Central Penn Gas ("CPG"), UGI-Penn Natural Gas ("PNG") or UGI Utilities Gas Division ("UGI"). This is based on the declaration that UTILITY RATES ANALYSTS, Inc. will not be taking title to gas or directly serving end use customers. This also assumes that UTILITY RATES ANALYSTS, Inc. will be acting on the behalf of a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGI service territories and who has posted the required financial security as specified in the respective UGI tariffs. If UTILITY RATES ANALYSTS, Inc. wishes to directly serve Choice customers in the service territories of UGI, PNG and/or CPG in the future as a natural gas supplier, it will have to post security as specified in the respective UGI tariffs prior to the commencement of the service.

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

Sincerely,

David E. Lahoff
Manager, Rates

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An Exelon Company

ExelonSM

Energy Delivery

May 10, 2013
PECO - Exelon Corporation
Energy Acquisition
2301 Market Street
Philadelphia, PA. 19101

Steve Cantore
Utility Rates Analysts
220 South 17th Street
Camp Hill, PA 17011
steve@utilityratesanalysts.com

PECO is aware that Utility Rates Analysts has applied for a license to provide brokering and consulting services to large commercial and industrial customers on the distribution system of PECO.

In making such an application, Utility Rates Analysts must furnish a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Utility Rates Analysts has indicated that it intends to provide only brokering and consulting services to large commercial and industrial customers, and will not take title to any delivered natural gas. Therefore, we have determined at this time that Utility Rates Analysts does not need a bond or other financial security requirement to provide consulting services to PECO customers.

However, if the services provided by Utility Rates Analysts, or the creditworthiness requirement for PECO's exposure to Utility Rates Analysts changes in the future, PECO reserves the right to require Utility Rates Analysts to provide a bond or other financial security instrument.

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

Sincerely,

A handwritten signature in black ink that reads "Carol Reilly".

Carol Reilly

Manager

Energy Acquisition

Steve Cantore

220 S. 17th St. Camp Hill, PA 17011

Phone: (717) 648-6239

E-mail: steve@utilityratesanalysts.com

Experience

Utility Rates Analysts/URA, Inc. (Camp Hill, PA)

Owner/Utility Expert (1991 – present)

Audit utility costs (electric, gas, water, sewer and telecommunications)
Review tariff rates for correct application
Determine if exceptions and/or exemptions are in place
Analyze usage patterns
Electric and gas procurement
Rate negotiation

Mentor Systems (King of Prussia, PA)

Consultant (1988 –1991)

Work load time studies
Route reconfiguration for meter readers
Software implementation for routing packages
Project management

Sierra Pacific Power Company (Reno, NV)

Meter Reading Supervisor (1980 –1988)

Routing realignment
Work load time studies
Intermediary between meter reading and billing/accounting

Skills

- ▶ Drafting petitions
- ▶ Usage Studies for manufacturing facilities
- ▶ Refund negotiation
- ▶ Cost analysis

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Choose a building block.

Michael R. Walker

18 Triplett Ct, Dillsburg PA 17019

Phone: (717) 810-6511

E-mail: mike@utilityratesanalysts.com

Experience

Utility Rates Analysts (URA, Inc.), Camp Hill, PA

Business Manager and Corporate Secretary/Treasurer (2011 – present)

- Financial Analysis, Contract Review, Strategic Planning
- Accounts Receivable and Payable, Human Resources

AlphaGraphics, Camp Hill, PA

General Manager (1988 – 2011)

- Worked with owner in startup of printing/communications/marketing company
- Responsible for all aspects of operation: Production, Purchasing, Human Resources, Monthly Financials, Strategic Planning, Customer Service
- Recognized with the Franny Award as the best AlphaGraphics franchise 1992
- Recognized as the top manager in the AlphaGraphics network 1998

MHK Associates (Morrison-Knudsen) New Cumberland, PA

Document Control Coordinator (1986 – 1988)

- Responsible for drawing and specification control on \$170 million Eastern Distribution Center built for U.S. Army at the New Cumberland Army Depot
- Ensured all subcontractor and vendor users had up-to-date construction documents
- Supervised on-site blueprint and reproduction facility

Education

Mount St. Mary's University, Emmitsburg, MD

Bachelor of Science, Business & Finance, 1986

- Dean's List
- Minor in Accounting
- Varsity Basketball (Sr. Captain), Business Honor Society (Delta Mu Delta)

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Jesse V. Cantore

6384 Galleon Drive, Mechanicsburg, PA 17050

Phone: (717) 756-5037

E-mail: jesse@utilityratesanalysts.com

Experience

Utility Rates Analysts (Camp Hill, PA)

Electric Procurement Specialist (January 2008 – present)

Overbilling reviews
Sales and marketing
Electric procurement pricing
Contract reviews
Supplier coordination
Customer Service

Skills

- ▶ Usage studies for manufacturing facilities
- ▶ Cost analysis
- ▶ Contract negotiation
- ▶ Drafting petitions

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

Applicant:: _____ URA, Inc. _____

By: _____ Stephen Cantore _____

Title: _____ President _____

AFFIDAVIT

[Commonwealth/State] of Pennsylvania :

: ss.

County of Cumberland :

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

[He/she is the President/Owner (Office of Affiant) of URA, Inc. (Name of Applicant);]

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

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

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

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

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

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

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

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



Signature of Affiant

Sworn and subscribed before me this 30 day of MAY, 2013.



Signature of official administering oath

My commission expires 10/24/2013.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Michael F. Nixon, Notary Public
Fairview Twp., York County
My Commission Expires Oct. 24, 2013
Member, Pennsylvania Association of Notaries

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AFFIDAVIT

[Commonwealth/State] of Pennsylvania :

: ss.

County of Cumberland :

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

[He/she is the President/Owner (Office of Affiant) of URA, Inc. (Name of Applicant);]

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

That _____, the Applicant herein certifies that it has caused the notice of the filing of its license application published in the following newspapers on _____:
(date)

A copy of the notice as it appeared in each of the above newspapers is attached. Noted on each copy is the newspaper section (name, number or letter), if applicable, and the page number on which the notice appeared.

That URA, Inc. , the Applicant will submit to the Commission the proof of publication from each newspaper in which notice of the application filing was published as soon as it is available.

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 _____ day of _____, 19____.

Signature of official administering oath

My commission expires _____.

AFFIDAVIT

[Commonwealth/State] of Pennsylvania :

: ss.

County of Cumberland :

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

[He/she is the President/Owner (Office of Affiant) of URA, Inc. (Name of Applicant);]

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

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

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

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

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

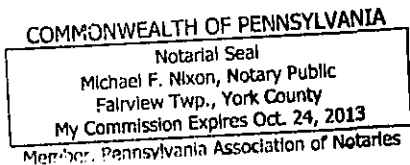
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

Stephen Cantore
Signature of Affiant

Sworn and subscribed before me this 30 day of MAY , 2013 , 19 .

Michael F. Nixon
Signature of official administering oath

My commission expires 10/24/2013 .



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Disclosure Statement For Natural Gas Procurement

This is an agreement for natural gas services, between URA, Inc. and _____.

Background

We at URA, Inc. are licensed by the Pennsylvania Public Utility Commission to offer alternate supply natural gas services in Pennsylvania. Our PUC license number is _____.

- We do not set the prices and charges that you pay. We assist in obtaining pricing from suppliers and in interpreting contract terms. The PUC regulates distribution or delivery prices and services. The Federal Energy Regulatory Commission regulates interstate pipeline prices and services.
- We do not bill you for our services as we are compensated by the selected supplier; however, you (the customer) may ask us to bill you directly.
- Right of Recision - You may cancel this agreement at any time before midnight of the third business day after receiving this disclosure.
- The contract you sign for natural gas supply is between you (the customer) and the natural gas supply company.

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

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

You will pay _____ (Mcf/Dth/ccf) for the commodity (NYMEX) of natural gas.

You will pay _____ (Mcf/Dth/ccf) for other natural gas service (Basis).

Your total cost of natural gas is your Basis price + your NYMEX price as outlined on your supplier gas contract.

2. **Length of Agreement**

You will buy your natural gas services for the above street address from _____ beginning _____ through _____.

3. **Special Terms and Conditions** – Any special terms and conditions between you, the customer and the natural gas supplier would be shown on the supplier agreement.

4. **Special Services** – URA will assist in determining the correct amount of natural gas to purchase on a month-to-month basis. There is no additional charge for this service.

5. Penalties, Fees and Exceptions – As we are not collecting any revenues, there will be no penalties or fees applicable between URA and you, the customer.

6. Cancellation Provisions – Any Cancellation Provisions will be noted on the supplier agreement and will be between you, the customer, and the supplier.

7. Renewal Provision – Any Renewal Provisions will be noted on the supplier agreement and will be between you, the customer, and the supplier.

8. Agreement Expiration/Change in Terms - We will contact you at least 90 days from the end of your term with the alternate supplier to discuss your options. You can contact URA regarding terms at any time.

9. Dispute Procedures - Contact URA with any questions concerning your contract or our terms of service. You may call the PUC if you are not satisfied after discussing your terms with us.

10. Contact Information

Supplier Name: _____

Address: _____

Phone Number: _____

Internet Address: _____

Distribution Company Name: _____

Provider of Last Resort Name: _____

Address: _____

Phone Number: _____

Public Utility Commission (PUC)

Address: P.O. Box 3265 Harrisburg, PA 17105-3265

Natural Gas Competition Hotline Number: 1-888-xxx-xxxx

Universal Service Program Name: _____

Phone Number: _____

APPENDIX C
EXAMPLE FORM OF NOTICE

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

*Application of **Company Name** (d/b/a "**Trade Name**") 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, Docket No. **A-125XXX**.*

On **Month Date, Year, Company Name** filed 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, (2) a broker/marketer engaged in the business of supplying natural gas, and (3) an aggregator engaged in the business of providing natural gas supply services. **Company Name** 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 **Company Name** 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 **Company's Name** attorney at the address listed below. Please include the PUC's "docket number" on any correspondence, which is

A-125XXX.

By and through Counsel: Attorney's Name

Company Name

Address

Address

Phone

FAX

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 or 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 provide 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 supplies available to similarly situated marketers on a 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. The [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 a 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 Supplier. 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 buy 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 interstate 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.

URA Inc
220 South 17th Street
Camp Hill PA 17011

Secretary of the Commission
Keystone Building, 400 North St
2nd Floor, Room N201
Harrisburg PA 17120

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