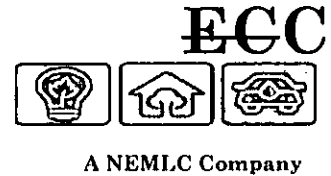


# Energy Choice Consulting

1049 Shore Road  
Suite A  
Linwood, NJ 08221  
[www.energychoiceconsulting.com](http://www.energychoiceconsulting.com)  
T: 609.365.7072  
F: 609.297-5747



August 14, 2013

Pennsylvania Public Utilities Commission  
Secretary  
P.O. Box 3265  
Harrisburg, PA 17105

**Re: *In the Matter of the Application of North American Power and Gas, LLC for Licensure by the Pennsylvania Public Utilities Commission to Supply Natural Gas in the Commonwealth of Pennsylvania.***  
***Docket No. A-2013-2353838***

Dear Madam Secretary,

On February 21<sup>st</sup>, 2013, our firm filed the requisite application on behalf of North American Power and Gas ("NAPG" or "Applicant") for licensure as a Natural Gas Supplier ("NGS") by the Pennsylvania Public Utilities Commission ("PAPUC" or "Commission") in accordance with Title 66, Subpart D, Ch. 22, § 2208 *et seq.*

In addition to the waiver letter provided to the Commission in Exhibit 17(b) of the original filing by Equitable Gas Company, enclosed are similar letters from PECO, UGI, People's, and National Fuel.

Pursuant to § 62.111 of the Pa. Code, attached please find waiver letters stating that NAPG can operate in their respective territories. Applicant respectfully requests that the Commission add these service territories to NAPG's initial license under consideration.

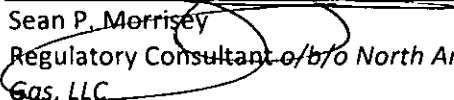
Should Commission Staff require any additional information or clarification, please do not hesitate to contact this office at your convenience.

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AUG 16 2013

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Respectfully Submitted,

  
Sean P. Morrissey  
Regulatory Consultant *o/b/o* North American Power and  
Gas, LLC

1049 Shore Road, Suite A  
Linwood, NJ 08221  
T: 609.365.7072

E: [smorrissey@energychoiceconsulting.com](mailto:smorrissey@energychoiceconsulting.com)

Enc:



**National Fuel**

July 30, 2013

North American Power  
20 Glover Ave  
Norwalk, CT, 06850  
Attn: Michael Essman, Energy Analyst

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SECRETARY'S BUREAU

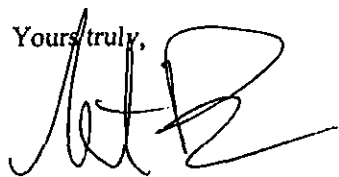
RE: Security Requirement for North American Power

Dear Michael:

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 North American Power ("NAPG") and has determined that North American Power 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.

North American Power's security requirement to serve Pennsylvania customers is dependent on the type of transportation service utilized by North American Power. 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, North American Power 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



UGI Utilities, Inc.  
2525 North 12th Street  
Suite 360  
Post Office Box 12677  
Reading, PA 19512-2677  
(610) 796-3400 Telephone

March 8, 2013

Sean P. Morrissey  
North American Power and Gas LLC  
NEMLC, LLC  
199 New Road  
Suite 61-187  
Linwood, NJ 08221

RE: UGI Financial Security Requirements

Dear Mr. Morrissey

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

This determination may change in the event there is a material deterioration in that condition, if NAPG'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 NAPG 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 written in a cursive style with a large, sweeping flourish at the end.

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

**RECEIVED**

**AUG 16 2013**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**



375 North Shore Drive  
Suite 600  
Pittsburgh PA 15212

www.peoples-gas.com

July 24, 2013

Paul Rossi  
Vice President  
North American Power and Gas, LLC  
20 Glover Avenue  
Norwalk, CT 06851

Dear Mr. Rossi:

This letter serves as notification that Peoples Natural Gas Company does not require North American Power and Gas, 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.Petrichevich@peoples-gas.com](mailto:Lynda.W.Petrichevich@peoples-gas.com).

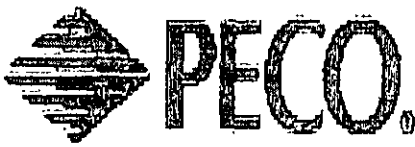
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PA PUBLIC UTILITIES COMMISSION  
SECRETARIES BUREAU

Sincerely,

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



An Exelon Company

July 29, 2013  
PECO - Exelon Corporation  
Energy Acquisition  
2301 Market Street  
Philadelphia, PA. 19101

Michael Essman  
Energy Analyst  
North American Power  
20 Glover Ave  
Norwalk, CT, 06850

Energy Acquisition is providing this notification letter that North American Power and Gas, LLC has met the creditworthiness business requirement involved with the Pennsylvania Gas Choice - Low Volume Transportation program, pursuant to the receipt of an initial Surety of \$35,000.00 Guaranty. The Surety may be submitted to PECO via three acceptable forms; a Cash Deposit, a Letter of Credit, or a Surety bond. 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.

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SECRETARY'S BUREAU

Sincerely,

A handwritten signature in cursive script that reads "Carol Reilly".

Carol Reilly

Manager

Energy Acquisition



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PENNSYLVANIA PUBLIC UTILITY COMMISSION  
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<b>From:</b> SEAN P MORRISEY NEMLC, LLC 199 NEW RD STE 61-187 LINWOOD NJ 08221-2025	<b>Ref#:</b> NAPG NGDC
<b>To:</b> ROSEMARY CHIAVETTA, SECRETARY PENNSYLVANIA PUBLIC UTILITY COMMISSION PO BOX 3265 HARRISBURG PA 17105-3265	
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