



Lauren Bauer Zinman, Esq.
Corporate Counsel

August 27, 2013

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BY FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Building, 400 North Street
2nd Floor, Room N201
Harrisburg, PA 17120

RE: In the Matter of Application of TFS Energy Solutions, LLC d/b/a Tradition Energy To Furnish Natural Gas Supply Services (Broker) in the Commonwealth of Pennsylvania - Docket Number: A-2013-2368622

Dear Ms. Chiavetta:

In connection with the Natural Gas Supplier License Application for the Commonwealth of Pennsylvania on behalf of TFS Energy Solutions, LLC d/b/a Tradition Energy (the "Application") and at the request of the Bureau of Technical Utility Services, we hereby amend **Section 17-B Bonding** of such Application and submit a revised page 10 in accordance therewith.

In addition, to supplement the Application, enclosed please waiver letters of bonding/credit requirements from the following natural gas distribution companies:

1. Columbia Gas of Pennsylvania
2. Natural Fuel Gas Distribution Corporation
3. PECO
4. Peoples Natural Gas Company
5. Peoples TWP LLC
6. UGI Utilities, Inc.
7. Valley Energy

We will forward you the remaining waiver letters upon their receipt. Please contact the undersigned at lauren.zinman@tradition.com or (203) 391-2253 if you have any questions. Thank you in advance for your time and attention to this matter.

Sincerely,



Lauren Bauer Zinman, Esq.

cc: Lee Yalcin (via email at lyalcin@pa.gov)

- Applicant's balance sheet and income statement for the most recent fiscal year. Published financial information such as 10K's and 10Q's may be provided, if available.
See Attachment C.
- Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form or other independent financial service reports.
- A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee.
- *Audited financial statements*
- Such other information that demonstrates Applicant's financial fitness.

B. Applicant must provide the following information:

- Provide proof of compliance with bonding/credit requirements for each NGDC the applicant is proposing to provide service in. This requirement is designated by each NGDC and can commonly be found in the NGDC supplier tariff.

Applicant has requested waiver letters from each NGDS as to each NGDS' bonding/credit requirements. Applicant shall submit such letters to the Commission under separate cover.

- Identify Applicant's chief officers including names and their professional resumes.

Alan Kurzer and Brian McDermott are the chief officers who will be responsible for Applicant's activities in Pennsylvania. Copies of their professional resumes are attached as Attachment D.

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

**Robert Florio
Treasurer
32 Old Slip, 34th Floor
New York, 10005
Tel: (212) 943-2175
Fax: (212) 363-6537**

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

As shown on the Operating Agreement provided in Attachment A, Applicant was formed for the purpose of carrying on the business of the provision of retail brokerage services and all activities reasonably related thereto. Applicant provides energy management solutions (which include supply management and procurement; data management and reporting; and market research and intelligence) to its customers. Applicant works with its customers to solicit bids from energy suppliers; assist in the selection of an energy supplier; and manage its continuing energy costs and needs. Applicant currently provides brokering and aggregation services to large commercial and

June 12, 2013

Lauren Bauer Zinman, Esq.
TFS Energy Solutions, LLC
680 Washington Blvd
Stamford, CT 06901

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Dear Mrs. Zinman:

We are pleased that TFS Energy Solutions d/b/a Tradition Energy ("TFS") 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, TFS 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. TFS has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that TFS 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 TFS changes in the future, Columbia Gas might deem it appropriate to require TFS 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



National Fuel

August 6, 2013

Lauren Bauer Zinman
TFS Energy Solutions, LLC
D/B/A Tradition Energy
680 Washington Blvd
Stamford, CT 06901

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Security Requirement for TFS Energy Solutions, LLC

Dear Ms. Zinman:

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

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

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

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

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

Yours truly,

Nathan E. Barnes
Transportation Services Department



An Exelon Company

August 6th, 2013

Brian McDermott
Tradition Energy Solutions, LLC
680 Washington Blvd
Stamford, CT, 06901
golden@energymarketexchange.com

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Bonding Requirements

Dear Brian McDermott

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

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

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

Respectfully submitted,

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

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



An Exelon Company

ExelonSM

Energy Delivery

August 7, 2013
PECO - Exelon Corporation
Energy Acquisition
2301 Market Street
Philadelphia, PA. 19101

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Lauren Bauer Zinman, Esq.
Corporate Counsel
Tradition Energy Solutions, LLC
680 Washington Blvd
Stamford, CT 06901
Lauren.Zinman@Tradition.com

PECO is aware that Tradition Energy Solutions, LLC 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, Tradition Energy Solutions, LLC must furnish a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Tradition Energy Solutions, LLC 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 Tradition Energy Solutions, LLC does not need a bond or other financial security requirement to provide consulting services to PECO customers.

However, if the services provided by Tradition Energy Solutions, LLC, or the creditworthiness requirement for PECO's exposure to Tradition Energy Solutions, LLC changes in the future, PECO reserves the right to require Tradition Energy Solutions, LLC 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 cursive script that reads "Carol Reilly".
Carol Reilly
Manager
Energy Acquisition



375 North Shore Drive
Suite 600
Pittsburgh PA 15212

www.peoples-gas.com

August 7, 2013

Lauren Bauer Zinman, Esq.
Corporate Counsel
Tradition Energy
680 Washington Blvd
Stamford, CT 06901

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Ms. Zinman:

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

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

Sincerely,

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



PEOPLES TWP LLC

205 North Main Street
Butler, PA 16001

August 7, 2013

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Lauren Bauer Zinman, Esq.
Corporate Counsel
Tradition Energy
680 Washington Blvd
Stamford, CT 06901

Dear Ms. Zinman:

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

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

Sincerely,

Andrew Wachter
Manager, Rates and Regulatory Affairs
Peoples TWP LLC



UGI Utilities, Inc.
2525 North 12th Street
Suite 300
Post Office Box 12677
Reading, PA 19612-2677
(610) 796-3400 Telephone

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August 20, 2013

Lauren Bauer Zinman, Esq.
Corporate Counsel
Tradition Energy
680 Washington Blvd
Stamford, CT 06901

AUG 27 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Tradition Energy application to serve as a broker/marketer

Dear Ms. Zinman,

UGI Utilities Inc. ("UGIU") has reviewed the license application of TFS Energy Solutions, LLC, d/b/a Tradition Energy ("TRADITION"). Based on this review and your assertion that TRADITION will be acting as a broker/marketer, UGIU has concluded that TRADITION 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 TRADITION will not be taking title to gas or directly serving end use customers. This also assumes that TRADITION 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 TRADITION 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,

A handwritten signature in black ink, appearing to read "David E. Lahoff". The signature is written in a cursive, flowing style.

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



VALLEY ENERGY

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

August 6, 2013

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Lauren Bauer Zinman, Esquire
TFS Energy Solutions, LLC
d/b/a Tradition Energy
680 Washington Blvd.
Stamford, CT 06901

AUG 27 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Ms. Zinman:

We understand that TFS Energy Solutions, LLC (d/b/a Tradition Energy) 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 TFS Energy Solutions, LLC (d/b/a Tradition Energy) intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that TFS Energy Solutions, LLC (d/b/a Tradition Energy) 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 TFS Energy Solutions, LLC (d/b/a Tradition Energy) 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

From: (203) 351-9520
LAUREN ZINMAN, ESQ.
TRADITION FINANCIAL SERVICES
680 WASHINGTON BLVD

Origin ID: JSDA



STAMFORD, CT 06901

Ship Date: 27AUG13
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CAD: 4734107/INET3430

Delivery Address Bar Code

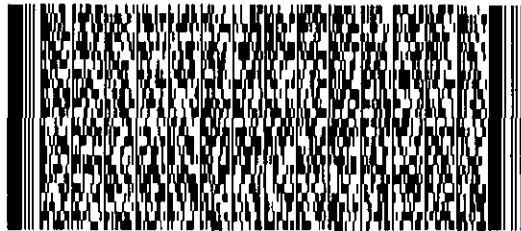


SHIP TO: (203) 391-2250 **BILL SENDER**
ROSEMARY CHIAVETTA, SECRETARY
Pennsylvania Pub Utility Commission
400 NORTH ST
COMMONWEALTH KEYSTONE BUILDING
HARRISBURG, PA 17120

Ref #
Invoice #
PO #
Dept #

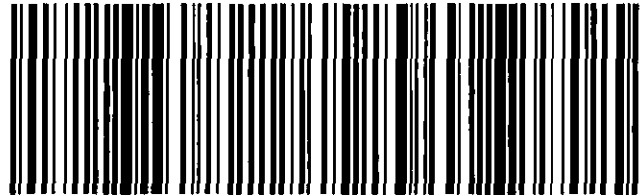
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