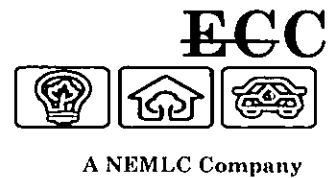


Energy Choice Consulting

1049 Shore Road
Suite A
Linwood, NJ 08221
www.energychoiceconsulting.com
T: 609.365.7072
F: 609.365.2437



 ORIGINAL

September 27, 2013

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

Re: Application of Keytex Energy Solutions LLC for certification as a Broker of natural gas in the Commonwealth of Pennsylvania.

Dear Madam Secretary,

Our firm has been retained by the above captioned Applicant, Keytex Energy Solutions LLC (hereafter "KEYTEX" or "Applicant") to assist them with regulatory and compliance filings in various jurisdictions.

Pursuant to Title 66 of the Pennsylvania Public Utility Code, Subpart D, Ch. 22 § 2208 *et seq.*, KEYTEX hereby submits the attached application for licensure as a Supplier of natural gas in the Commonwealth of Pennsylvania.

In addition to the original application enclosed herein, please find one copy and a CD-ROM containing a searchable pdf version of the application.

In accordance with 52 Pa. Code § 54.32, certain exhibits attached hereto contain questions that require Applicant to disclose proprietary and confidential financial information. Those exhibits are clearly and conspicuously marked CONFIDENTIAL and this transmittal letter accompanies a statement of support as to why such disclosures would irreparably damage Applicant's business interests and financial security.

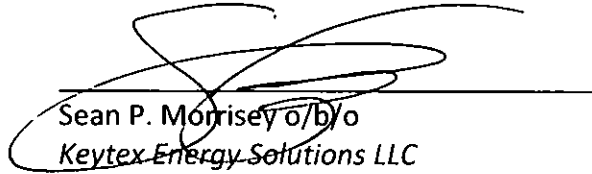
Should you have any questions or concerns regarding this application, or require any additional documentation or information, please do not hesitate to contact this office at your convenience.

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SECRETARY'S BUREAU

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Sean P. Morrissey", is written over a horizontal line. The signature is stylized and somewhat illegible.

Sean P. Morrissey o/b/o
~~Keytex Energy Solutions LLC~~

NEMLC, LLC

199 New Road

Suite 61-187

Linwood, NJ 08221

T: 609.365.7072

F: 609.365.2437

E: smorrissey@energychoiceconsulting.com

Encl: Natural Gas Broker Application of Keytex Energy Solutions, LLC
Petition for protective order of proprietary business information

BEFORE

THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of)	
Keytex Energy Solutions, LLC)	Docket No.
For Certification as a Broker of natural)	
gas services in the Commonwealth of)	
Pennsylvania.)	

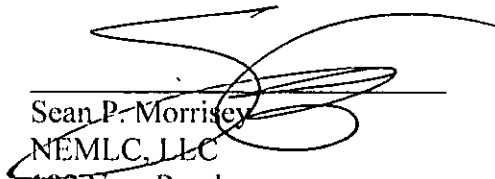
MOTION FOR PROTECTIVE ORDER

Applicant, Keytex Energy Solutions, LLC (hereinafter, "KEYTEX" or "Applicant") moves pursuant to Pa. Code § 54.32 (e)(f), for the entry of a Protective Order to designate as confidential its responses to question 17 [*attached Exhibit 17 – FINANCIAL DISCLOSURE*], in the Commission's Certification Application for Natural Gas Generation Supplier ("NGS") Application Package. These questions seek information and records that KEYTEX considers confidential and proprietary financial data, and which are maintained as confidential by the Company. Public disclosure of this information would be potentially harmful to Applicant's competitive position as a supplier of natural gas and the Member's personal financial security.

KEYTEX asks further that its responses to any subsequent requests for additional information or clarification which the Commission Staff might make with regard to these same requests also be permitted to be filed under seal, pursuant to the same Protective Order requested herein. The grounds supporting this Motion are fully explained in the subsequent Memorandum of Support.

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 SECRETARY'S BUREAU

Respectfully Submitted,


 Sean P. Morrissey
 NEMLC, LLC
 199 New Road
 Suite 61-187
 Linwood, NJ 08221
 T: 609.365.7072
 F: 609.365.2437
 smorrisey@energychoiceconsulting.com
 o/b/o Keytex Energy Solutions LLC

MEMORANDUM IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER

Keytex Energy Solutions LLC is a Pennsylvania Limited Liability Company, registered as a Domestic For Profit Limited Liability Company by filing with the Pennsylvania Secretary of State.

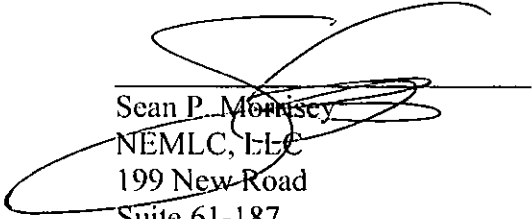
Questions 17 states, “Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided.” Examples of such information which may be submitted include the following: - Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies. - Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient) - Applicant's accounting statements, including balance sheet and income statements for the past two years. - 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, evidence of Moody's, S&P, or Fitch ratings, and/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 exhibiting accounts over a minimum two year period. - Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

Applicant gladly provides this information to the Commission, but asks that it be subject to Protective Order due to the confidential, proprietary nature of this information and because public disclosure might be injurious to the Company's competitive position and the Financial Security of the Applicant. It is submitted that this is private information, in that Applicant is a Private limited liability company engaged solely in Brokering electricity and natural gas and does not make public disclosure of the requested information through SEC filings or otherwise. As such, and given the intense competition in the NGS arena, this information is legitimate proprietary data, access to which could negatively affect Applicant's competitive position as a supplier of natural gas.

This request for a Protective Order is reasonable, necessary and will not prejudice any other party or individual. In fact, to the extent KEYTEX's ability to compete effectively is preserved, Pennsylvania consumers will be better served. Fair competition is the philosophical basis for the NGS statutes and subsequent regulations.

For the foregoing reasons, Applicant respectfully requests that a Protective Order be issued which permits it to file its responses to the identified natural gas supplier Application Question 17 and corresponding exhibits under seal and requires those with access to those responses to treat them in a confidential manner. All such responses shall be clearly and conspicuously marked CONFIDENTIAL.

Respectfully Submitted,



Sean P. Morrissey
NEMLC, LLC
199 New Road
Suite 61-187
Linwood, NJ 08221
T: 609.365.7072
F: 609.365.2437
smorrisey@energychoiceconsulting.com
o/b/o Keytex Energy Solutions LLC

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Keytex Energy Solutions, LLC, d/b/a same, for approval to offer, render, furnish, or as a(n) ~~as specified in item #8 below~~ to the public in the Commonwealth of Pennsylvania.

Broker/Marketer

To the Pennsylvania Public Utility Commission:

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

Keytex Energy Solutions, LLC
200 Brush Run Road, Suite C
Greensburg, PA15106
T: 724-468-6500
F: 724-468-6504

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.

Three Rivers Energy Consulting, LLC changed with PA Dept. of State on 8/17/2009
200 Brush Run Road, Suite C
Greensburg, PA15106
T: 724-468-6500
F: 724-468-6504

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:

Sean P. Morrissey, Regulatory Consultant T: 609.365.707
1049 Shore Road, Suite A F: 609.297.5747
Linwood, NJ 08221 E: smorrissey@energychoiceconsulting.com

- 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:

Lennie Davis, Director of Retail Operations T: 724-468-6500
200 Brush Run Road, Suite C F: 724-468-6504
Greensburg, PA15106 E: ldavis@keytexenergy.com

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

not applicable

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SECRETARY'S BUREAU

- 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:

Applicant's principal office is located within the Commonwealth in Greensburg, PA

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)

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.

See Exhibit 5

- * 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

- 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.

See Exhibit 5

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.

- 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.

Applicant is currently operating as a EGS (Broker) approved under PUC Docket No. A-2009-2148518

- If the Applicant or an affiliate has a predecessor who has done business within Pennsylvania, give name and address of the predecessor(s) and state whether the predecessor(s) were jurisdictional public utilities.

OR

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

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
 - Other. (Identify the nature of service being rendered.)

Applicant is licensed EGS (Broker) in the Commonwealth of Pennsylvania.

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.
- 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 intends to serve all customer classes throughout the entire Commonwealth of Pennsylvania each every NGDC service territory. At no time will Applicant be taking title to natural gas and will solely be acting as a Broker as defined in 52 Pa. Code.

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

PECO, National Fuel, PGW, People's TWP LLC, Equitable Gas Co., Columbia Gas of Pennsylvania, People's Gas, UGI Central Penn, UGI Penn Natural, UGI (UGI Waiver Letter Requested and Pending)

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

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

12. **START DATE:** The Applicant proposes to begin delivering services on October 25, 2013, upon Commission Approval (approximate date).

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.

15. **COMPLIANCE:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application has been convicted of a crime involving fraud or similar activity. Identify all proceedings, by name, subject and citation, dealing with business operations, in the last five (5) years, whether before an administrative body or in a judicial forum, in which the Applicant, an affiliate, a predecessor of either, or a person identified herein has been a defendant or a respondent. Provide a statement as to the resolution or present status of any such proceedings.

No such proceedings have taken place.

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.

b. Provide a copy of all standard forms or contracts that you use, or propose to use, for service provided to residential customers.

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 Exhibit 16

17. **FINANCIAL FITNESS:**

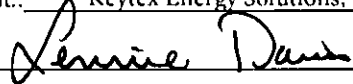
A. Applicant shall provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:

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

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

- Provide the name, title, address, telephone number and FAX number of Applicant's custodian for its accounting records.
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.
 - 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.
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.**
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: Keytex Energy Solutions, LLC
 By: 
 Title: Lennie Davis, Operations Director

AFFIDAVIT

[Commonwealth/State] of PA :

: ss.

County of Westmoreland :

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

[He/she is the Operations Director (Office of Affiant) of Keytex Energy Solutions, LLC ("Keytex")

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

That Keytex, 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 Keytex, 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 Keytex, 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 Keytex, 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.

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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.

Pennie Pano
Signature of Affiant

Sworn and subscribed before me this 4th day of September, 2013

Karen S. Ellenberger
Signature of official administering oath

My commission expires 11/30/2014.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Karen S. Ellenberger, Notary Public
Salem Twp., Westmoreland County
My Commission Expires Nov. 30, 2014
Member, Pennsylvania Association of Notaries

AFFIDAVIT

[Commonwealth/State] of PA :

: SS.

County of Westmoreland :

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

[He/she is the Operations Director (Office of Affiant) of Keytex Energy Solutions, LLC ("Keytex")

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

That Keytex, 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 Keytex, 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.

Lennie Davis
Signature of Affiant

Sworn and subscribed before me this 4th day of September, 2013

Karen S. Ellenberger
Signature of official administering oath

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OCT 2 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

My commission expires 11/30/2014.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Karen S. Ellenberger, Notary Public
Salem Twp., Westmoreland County
My Commission Expires Nov. 30, 2014
Member, Pennsylvania Association of Notaries

AFFIDAVIT

[Commonwealth/State] of PA :

: SS.

County of Westmoreland :

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

[He/she is the Operations Director (Office of Affiant) of Keytex Energy Solutions, LLC

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

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

That the Applicant herein Keytex 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 Keytex 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.

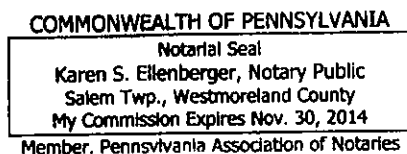
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

Lennie Davis
Signature of Affiant

Sworn and subscribed before me this 4th day of September, 2013

Karen S. Ellenberger
Signature of official administering oath

My commission expires 11/30/2014.



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Exhibit 5 – Name & Address of Officers for Keytex Energy Solutions, LLC

Greg Cammerata, President
1038 Valley View Drive
Latrobe PA 15650
724-468-6500 x. 201

Michael Cammerata, VP
146 Cohasset St.
Pittsburgh, PA 15221
724-468-6500 x. 213

Attached hereto please also find Applicant's Articles of Formation.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

KeyTex Energy Solutions LLC

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

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

ENTITY NUMBER: 3742129

RECEIVED

OCT 2 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Cammerata, Gregory
200 Brush Run Rd Suite C
Greensburg, PA 15601

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Certificate of Amendment-Domestic
(15 Pa.C.S.)

- Limited Partnership (§ 8512)
 Limited Liability Company (§ 8951)

Name Gregory T. Cammerata		
Address 200 Brush Run Road, Suite C		
City Greensburg	State PA	Zip Code 15601

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

Commonwealth of Pennsylvania
LIMITED LIABILITY AMENDMENT 4 Page(s)

Fee: \$70



T0922947151

In compliance with the requirements of the applicable provisions (relating to certificate of amendment), the undersigned, desiring to amend its Certificate of Limited Partnership/Organization, hereby certifies that:

1. The name of the limited partnership/limited liability company is:
Three Rivers Energy Consulting, LLC

2. The date of filing of the original Certificate of Limited Partnership/Organization: July 11, 2007

3. Check, and if appropriate complete, one of the following:

The amendment adopted by the limited partnership/limited liability company, set forth in full, is as follows:

Request to change the name of Three Rivers Energy Consulting LLC to KeyTex Energy Solutions LLC. All other information relating to the LLC will remain the same.

The amendment adopted by the limited partnership/limited liability company is set forth in full in Exhibit A attached hereto and made a part hereof.

4. Check, and if appropriate complete, one of the following:

The amendment shall be effective upon filing this Certificate of Amendment in the Department of State.

The amendment shall be effective on: _____ at _____
Date Hour

PA DEPT. OF STATE

AUG 17 2009

5. Check if the amendment restates the Certificate of Limited Partnership/Organization:

The restated Certificate of Limited Partnership/Organization supersedes the original Certificate of Limited Partnership/Organization and all previous amendments thereto.

IN TESTIMONY WHEREOF, the undersigned limited partnership/limited liability company has caused this Certificate of Amendment to be executed this

11th day of August, 2009.

Three Rivers Energy Consulting, LLC

Name of Limited Partnership/Limited Liability Company

[Handwritten Signature]
Signature

Member

Title



PENNSYLVANIA
Department of State

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Business Entity Filing History

Date: 9/11/2009 (Select the link above to view the Business Entity's Filing History)

Business Name History

Name	Name Type
KeyTex Energy Solutions LLC	Current Name
Three Rivers Energy Consulting, LLC	Prior Name

Limited Liability Company - Domestic - Information

Entity Number: 3742129
 Status: Active
 Entity Creation Date: 7/11/2007
 State of Business.: PA
 Registered Office Address: 200 Brush Run Road, Suite C
 Greensburg PA 15601
 Mailing Address: No Address

Officers

Name: GREGORY CAMMERATA
 Title: President
 Address: STE C 200 BRUSH RUN RD
 GREENSBURG PA 15601-65

[Home](#) | [Site Map](#) | [Site Feedback](#) | [View as Text Only](#) | [Employment](#)



Exhibit 13 – Certificate of Service

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

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

UGI Central Penn
David Beasten
2525 N. 12th Street, Suite 360
Reading, PA 19612-2677
PH: 610.796.3425
FAX: 610.796.3559

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

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

UGI
David Beasten
2525 N. 12th Street, Suite 360
Reading, PA 19612-2677
PH: 610.796.3425
FAX: 610.796.3559

UGI Penn Natural
David Beasten
2525 N. 12th Street, Suite 360
Reading, PA 19612-2677
PH: 610.796.3425
FAX: 610.796.3552

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

Equitable Gas Company
Jerald Moody
225 North Shore Drive
Pittsburgh, PA 15212-5352
PH: 412.395.3209
FAX: 412.395.3335

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

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

Philadelphia Gas Works
Douglas Moser
800 West Montgomery Avenue
Philadelphia, PA 19122
email: douglas.moser@pgworks.com

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OCT 2 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Applicant hereby certifies that a true and complete copy of the NGS Application herein has been served upon the above listed entities on this 27th day of September, 2013.


Sean P. Morrisey, Regulatory Consultant

Exhibit 16

Consumer Service and Complaints Contacts

Lennie Davis, VP of Operations
200 Brush Run Road, Suite C
Greensburg, PA
(724) 468-6500 Ext.212
(412) 760-7220 Mobile
(724) 468-6504 Fax
LDavis@KeyTexEnergy.com

Applicant, as a broker of natural gas, will not be contracting directing with any customer class in the Commonwealth.

RECEIVED

OCT 2 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Exhibit 17B - Chief Officers for Keytex Energy Solutions, LLC

Gregory T. Cammerata - Principal

In addition to his experience at KEYTEX Energy, Mr. Cammerata has 17 years experience with Allegheny Energy serving in various engineering and analytical capacities which began in 1991 as a Plant Engineer at a supercritical generation facility. In 1993 he was assigned to the Engineering Studies group where he specialized in the economics of Clean Air Act compliance. In 1999, Mr. Cammerata became a Project Development Engineer with the unregulated side of Allegheny Energy, where he managed all aspects of sitting and developing new power generation projects and expansions of existing facilities. He also performed economic evaluations of potential purchases of externally developed generation projects and divestitures of existing assets. In 2002 Mr. Cammerata became a Quantitative Analyst specializing in the area of Load and Generation Modeling as well as wholesale and retail pricing. He developed and modeled hedging strategies for Allegheny's wholesale trading group, developed pricing and load forecasting for structured transactions such as Provider of Last Resort agreements, developed wholesale and retail pricing models, modeled generation unit commitment and hedging strategies for Allegheny's generation fleet and modeled Allegheny's SO₂ and NO_x emission allowance requirements and compliance strategies.

Michael J. Cammerata – Principal

Mr. Cammerata has 13 years of experience in the energy industry. He joined Strategic Energy in 1997 as administrator of its web based electricity usage monitoring program. He later joined the energy management group in 1998 scheduling the company's initial energy deliveries as PA's electricity market first deregulated. In 2002 he became portfolio manager for the Texas region. As such, he was responsible for all forward hedging of electricity, ancillaries and renewable for SE's largest book. He has experience in scheduling and trading in NEPOOL, New York, PJM, MISO, ERCOT, and CA.

Michael A. Dandrea – Director, Sales and Marketing

Mr. Dandrea has 38 years of Engineering, Sales/Marketing, Global Utility/Industrial Business Development, and Operations Management responsibilities with General Electric's Power System Business in Schenectady, NY. Additionally for 10 years he served in various executive positions with Allegheny Energy (AE) until his retirement in 2005. As VP of Retail Energy Sales, Mr. Dandrea had profit and loss responsibility for AE's Retail Business Unit in the Middle Atlantic de-regulated electric energy markets. In this role he led the development of AE's retail energy marketing strategy, costing/pricing methodology, and customer acquisition. As Executive Director of Gas Turbine Operations, Mr. Dandrea was responsible for the operation, management, personnel safety, and availability of AE's gas turbine fleet.

Lennie Davis – Director, Retail Operations

Lennie Davis has 23 years of experience with Allegheny Energy prior to joining KEYTEX Energy. Mr. Davis worked in a variety of business areas including customer service, financial analysis, marketing, market research, and load forecasting. His experience in deregulated retail markets began when Pennsylvania opened in 1997. Mr. Davis was part of the management team that created Allegheny Energy's first retail business unit. Over the next fifteen years his work in various Allegheny retail subsidiaries included oversight of customer service operations, call centers, data entry, EDI activities, billing, and collections. During this period Allegheny took significant market share in New Jersey, Ohio, and Pennsylvania. In addition to his energy background Mr. Davis has also managed the customer service organization for a food manufacturer, and provided technical support for a start-up software company.

Samuel E. Perry – Director, Gas Operations

Mr. Perry has over 35 years of executive experience in the energy business, with the majority of those years focused in natural gas. With a 28 year career at Equitable Resources, his expertise is extensive: rate making, drilling programs, interstate gas pipelines, gas supply, natural gas trading, FERC regulations, corporate planning, sales and marketing, and acquisitions. Along with various executive sales and management positions, Mr. Perry held the position of Marketing. From 2001 – 2009 he worked at the Hess Corporation as the Regional Sales Manager for the Ohio Valley. In this position, he had P&L responsibilities for the region covering Western Pennsylvania, Ohio, West Virginia, and Kentucky.

Applicant has requested waiver letters from each NGDC in whose territory where Keytex seeks to operate.

Current waiver letters received attached herein.

Gregory T. Cammerata

10 38 Valleyview Drive, Latrobe PA 15650
Home: (724) 836-7671

Cell: (724) - 875-7581
Email: Gcammerata@keytexenergy.com

SUMMARY

I gained a solid foundation of energy industry knowledge as an Electrical Engineer and Quantitative Analyst with extensive generation and wholesale/retail electricity market experience at a large electric utility in the northeast. Using this knowledge, I have grown KEYTEX Energy into a major player in the retail energy services sector, currently managing over 3 Billion yearly KWH of customers across the country. Under my leadership, KEYTEX Energy was built on the principals of providing our customers with world class technical knowledge through a large and diverse team of energy professionals.

- * 21 + years' experience in the Electricity Industry
- * Extensive background in economic analysis
- * Extensive background in modeling related to the energy markets and power generation assets

EXPERIENCE

KEYTEX ENERGY

06/07- Present

PRESIDENT

- Direct a staff of approximately 22 energy professionals
- Make all corporate decisions
- Establish strategic direction
- Represent our company in the marketplace.

GenOps, LLC

01/12- Present

PRINCIPAL OWNER

- Company controls and optimizes the dispatch of approximately 4000 MW of power generation in the PJM RTO
- Includes the dispatch and optimization of two of the largest coal fired electric generating plants in the northeast US.

ALLEGHENY ENERGY, INC.

7/2002- 5/2007

LOAD & GENERATION MODELING QUANTITATIVE ANALYST

- Developed and modeled hedging strategies for Allegheny's various tradebooks
- Developed and modeled Structured Transaction pricing and bidding strategies for all wholesale RFP's
- Built all retail pricing models used for the purposed of pricing retail electricity customers
- Modeled unit commitment and hedging strategies for Allegheny's generation fleet
- Managed and modeled Allegheny's SO₂ and NO_x emission allowance banks
- Directly reported to CFO for the purpose of providing all financial modeling relating to energy contracts with the state of California worth in excess of \$600 million.

PROJECT DEVELOPMENT ENGINEER

2/1999- 6/2002

Managed all aspects of siting and developing power generation projects and facilities, including:

- Market Analysis to determine most economically viable locations

- Development and presentation of the project's economic justification
- Prepared and negotiated generation interconnect agreements
- Negotiated, on Allegheny's behalf, with local government officials and the community
- Negotiated fuel supply contracts for the generation facilities
- Economically evaluated externally developed generation projects as well as asset purchases and divestitures

PROJECT ENGINEER

10/1996-1/1999

- Managed the economic analysis process for various capital projects
- Managed the economic analysis process relating to least cost compliance with the Clean Air Act.
- Engineered and managed various capital projects

ENGINEER – ENGINEERING STUDIES

8/1992- 9/1996

- Managed the economic analysis process for various capital projects
- Managed the economic analysis process relating to least cost compliance with the Clean Air Act.

PLANT ENGINEER – FORT MARTIN POWER STATION

7/1991- 7/1992

- Engineered various capital and maintenance project to maintain day to day operational reliability and availability of the power station

EDUCATION

BS Electrical Engineering: West Virginia Univ., Morgantown, WV

Lennis B. Davis

240 Tiffany Drive, North Huntingdon, PA 15642
Home phone 724-863-6696

Cell Phone 412-760-7220
ldavis@keytexenergy.com

SUMMARY

Energy Executive with background in both regulated and deregulated operations, finance and marketing; ten years of retail market experience in all phases of enrollment and back office procedures; knowledge of utility billing practices; call center management; and regulatory affairs know-how.

EXPERIENCE

KEYTEX ENERGY SOLUTIONS

2009-present

SENIOR VP, RETAIL OPERATIONS

- Leads competitive bidding on energy supply for commercial and industrial customers, successfully placing over three billion kilowatt-hours of business.
- Maintains vendor relationships with wholesale suppliers across nation.
- Directs customer service and support operations.
- Manages online Customer Care Center.
- Directs bill audit program
- Compiles inventory of state and regional regulations controlling power sales.

NORTH SIDE FOODS

MANAGER, CUSTOMER SERVICE

2005-2009

- Led team of customer service professionals in business to business market.
- Managed order entry, delivery and invoicing cycles – resolves customer issues.
- Managed distribution network of three external warehouses.
- Served as member of Leadership Team in company-wide strategic planning.

PYRAMID CONSULTING – VELOSANT LP

2003-2004

CLIENT SERVICES CONSULTANT

- Trained Velosant customers on use of accounts payable / accounts receivable software.
- Resolved customer problems, provided Tier 2 technical support.
- Conducted help desk function for corporate clients.
- Presented new employee training.

ALLEGHENY ENERGY, INC.

BUSINESS CONSULTANT, GAS FIRED POWER STATIONS

2002

- Served as financial and accounting liaison for five power stations in four states.
- Performed financial analyses of power station capital investments and major expenditures.
- Managed station budget process, coordinating and consolidating annual budget preparation.

ALLEGHENY ENERGY, INC. (CONT.)

MANAGER, OPERATIONS

1998-2002

- Created customer service organization for Allegheny Energy's deregulated retail sales business unit which competed in Customer Choice programs in five states.
- Directed enrollment program for all deregulated retail customers. Successfully enrolled 250,000 customers with fifteen electric utilities in five states.
- Developed policies, hired and trained staff, and developed infrastructure.
- Led team that designed and established in-house call center for deregulated business unit.
- Directed daily call center operations. Conducted training on customer service and sales programs.
- Oversaw administration of 200,000 record customer database.
- Managed billing and collection programs for residential and commercial customers.
- Coordinated billing activities involving direct invoice, third party billing and Electronic Data Interchange (EDI) activities.
- Managed regulatory affairs for division. Researched, interpreted and applied regulatory rules and decisions from five public utility commissions.
- Participated on management team that marketed and sold this business unit to a former competitor.

TELEMARKETING MANAGER

1997-1998

- Created successful operations team for a start-up division in new Pennsylvania Pilot Customer Choice market.
- Hired personnel, developed procedures, built system infrastructure to meet demands of volatile deregulated electricity sales market.
- Designed outsourced call center solution, selected teleservices vendor and negotiated contract.
- Developed scripts and training materials for call center representatives.
- Analyzed call center performance, providing feedback and direction to teleservices vendor.
- Directed enrollment program and all customer service activities. Enrolled 25,000 customers in seven markets.
- Supervised data entry team of ten to forty persons.

RESIDENTIAL MARKETING ANALYST

1997-1998

- Developed Appliance Warranty program for residential customers.
- Established telemarketing and direct mail campaigns to promote products.
- Negotiated related multi-million dollar contracts (telemarketing and service administration).
- Co-founder of Competitor Intelligence function in new marketing organization.

SUPERVISOR, ECONOMIC DEVELOPMENT

1991-1996

SUPERVISOR, RESEARCH AND ANALYSIS

1987-1991

FORECAST ANALYST

1979-1987

EDUCATION

Masters of Business Administration: West Virginia University, Morgantown, WV
Bachelor of Science, Economics, Cum Laude: West Virginia Univ., Morgantown, WV



An Exelon Company

September 19th, 2013

Sean Morrisey
Keytex Energy Solutions, LLC
200 Brush Run Rd Ste C
Greensburg, PA, 15601

Re: Bonding Requirements

Dear Sean Morrisey

PECO is aware that Keytex 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, Keytex 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. Keytex 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 Keytex 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 Keytex Energy Solutions, LLC or the creditworthiness requirement for PECO's exposure to Keytex Energy Solutions, LLC changes in the future, PECO reserves the right to require Keytex 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



National Fuel

September 11, 2013

Keytex Energy Solutions, LLC
200 Brush Run Road Suite C
Greensburg, PA 15601

Re: Security Requirement for Keytex Energy Solutions, LLC

Dear Keytex Energy Solutions, LLC:

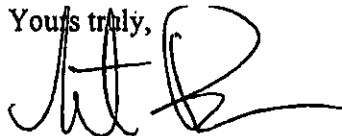
National Fuel Gas Distribution Corporation ("NFGDC") is aware that Keytex Energy Solutions, LLC ("Keytex") has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the service territory of NFGDC.

As you know, in making such an application, Keytex must furnish acceptable security to each utility where Keytex will do business. As such, under its tariff, NFGDC could require Keytex 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 Keytex intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, Keytex will never take title to any delivered natural gas.

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

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

September 13, 2013

Mr. Sean P. Morrissey
Keytex Energy Solutions, LLC
200 Brush Run Rd., Suite C
Greensburg, PA 15601

RE: Security Requirement Bond for Keytex Energy Solutions, LLC

Dear Mr. Morrissey:

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond M. Snyder", written over the word "Sincerely,".

Raymond M. Snyder
Vice President
Gas Management

RMS:b



September 11, 2013

Sean P. Morrisey
Keytex Energy Solutions, LLC
200 Brush Run Road
Suite C
Greensburg, PA 15601

Dear Mr. Morrisey:

This letter serves as notification that Peoples TWP LLC does not require Keytex Energy Solutions, LLC 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



375 North Stone Drive
Suite 600
Pittsburgh PA 15212

www.peoples-gas.com

September 11, 2013

Sean P. Morrisey
Keytex Energy Solutions, LLC
200 Brush Run Road
Suite C
Greensburg, PA 15601

Dear Mr. Morrisey:

This letter serves as notification that Peoples Natural Gas Company does not require Keytex Energy Solutions, 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.

Sincerely,

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

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

September 12, 2013

Mr. Sean P. Morrissey
Keytex Energy Solutions, LLC
200 Brush Run Road, Suite C
Greensburg PA 15601

Dear Mr. Morrissey:

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

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

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

Should you have any additional questions or concerns regarding a bond or other financial security instruments of Equitable, please do not hesitate to contact me at (412) 395-3370.

Sincerely,



Matthew D. Stanczak
Director, Process Improvement

Columbia GasSM
of Pennsylvania

A NiSource Company

Gas Transportation & Sales Support
200 Civic Center Drive
Columbus, OH 43215

September 11, 2013

Sean P. Morrisey
Keytex Energy Solutions, LLC
200 Brush Run Rd. Suite C
Greensburg, PA 15601

Dear Mr. Morrisey:

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

Exhibit 18 - Technical Fitness

To demonstrate Technical Fitness, Applicant hereby provides the following:

- Narratives for key operating personnel
- Operating, Business Overview and Staffing levels
- As Applicant does not take title to natural gas, no federal license is applicable.

Gregory T. Cammerata - Principal

In addition to his experience at KEYTEX Energy, Mr. Cammerata has 17 years experience with Allegheny Energy serving in various engineering and analytical capacities which began in 1991 as a Plant Engineer at a supercritical generation facility. In 1993 he was assigned to the Engineering Studies group where he specialized in the economics of Clean Air Act compliance. In 1999, Mr. Cammerata became a Project Development Engineer with the unregulated side of Allegheny Energy, where he managed all aspects of sitting and developing new power generation projects and expansions of existing facilities. He also performed economic evaluations of potential purchases of externally developed generation projects and divestitures of existing assets. In 2002 Mr. Cammerata became a Quantitative Analyst specializing in the area of Load and Generation Modeling as well as wholesale and retail pricing. He developed and modeled hedging strategies for Allegheny's wholesale trading group, developed pricing and load forecasting for structured transactions such as Provider of Last Resort agreements, developed wholesale and retail pricing models, modeled generation unit commitment and hedging strategies for Allegheny's generation fleet and modeled Allegheny's SO₂ and NO_x emission allowance requirements and compliance strategies.

Michael J. Cammerata – Principal

Mr. Cammerata has 13 years of experience in the energy industry. He joined Strategic Energy in 1997 as administrator of its web based electricity usage monitoring program. He later joined the energy management group in 1998 scheduling the company's initial energy deliveries as PA's electricity market first deregulated. In 2002 he became portfolio manager for the Texas region. As such, he was responsible for all forward hedging of electricity, ancillaries and renewable for SE's largest book. He has experience in scheduling and trading in NEPOOL, New York, PJM, MISO, ERCOT, and CA.

Michael A. Dandrea – Director, Sales and Marketing

Mr. Dandrea has 38 years of Engineering, Sales/Marketing, Global Utility/Industrial Business Development, and Operations Management responsibilities with General Electric's Power System Business in Schenectady, NY. Additionally for 10 years he served in various executive positions with Allegheny Energy (AE) until his retirement in 2005. As VP of Retail Energy Sales, Mr. Dandrea had profit and loss responsibility for AE's Retail Business Unit in the Middle Atlantic de-regulated electric energy markets. In this role he led the development of AE's retail energy marketing strategy, costing/pricing

methodology, and customer acquisition. As Executive Director of Gas Turbine Operations, Mr. Dandrea was responsible for the operation, management, personnel safety, and availability of AE's gas turbine fleet.

Lennie Davis – Director, Retail Operations

Lennie Davis has 23 years of experience with Allegheny Energy prior to joining KEYTEX Energy. Mr. Davis worked in a variety of business areas including customer service, financial analysis, marketing, market research, and load forecasting. His experience in deregulated retail markets began when Pennsylvania opened in 1997. Mr. Davis was part of the management team that created Allegheny Energy's first retail business unit. Over the next fifteen years his work in various Allegheny retail subsidiaries included oversight of customer service operations, call centers, data entry, EDI activities, billing, and collections. During this period Allegheny took significant market share in New Jersey, Ohio, and Pennsylvania. In addition to his energy background Mr. Davis has also managed the customer service organization for a food manufacturer, and provided technical support for a start-up software company.

Samuel E. Perry – Director, Gas Operations

Mr. Perry has over 35 years of executive experience in the energy business, with the majority of those years focused in natural gas. With a 28 year career at Equitable Resources, his expertise is extensive: rate making, drilling programs, interstate gas pipelines, gas supply, natural gas trading, FERC regulations, corporate planning, sales and marketing, and acquisitions. Along with various executive sales and management positions, Mr. Perry held the position of Marketing. From 2001 – 2009 he worked at the Hess Corporation as the Regional Sales Manager for the Ohio Valley. In this position, he had P&L responsibilities for the region covering Western Pennsylvania, Ohio, West Virginia, and Kentucky.

Operations Overview:

Applicant is currently licensed and operating as a Broker in the following jurisdictions:

1. Ohio CRES (Broker)
2. Pennsylvania EGS (Broker)
3. New Jersey (Electricity & Natural Gas Broker)
4. Illinois ABC License (Electricity Broker)

Keytex Energy Solutions, LLC (“KES”) an energy consulting and brokering company, was duly formed under the laws of the Commonwealth of Pennsylvania in 2007. Since its founding, KES’ mission has to become a leader in the deregulated energy market focusing on customer service and providing end-users the best possible value available in the marketplace.

Keytex has been a licensed electricity broker in Pennsylvania since March 11, 2010 (License No A-2009-2148518), Illinois ABC License No. 12-0525, and has held a similar license in Ohio since September 14, 2011 (License No. 11-389E), as well as New Jersey (electricity and natural gas.)

Serving the residential, industrial and commercial markets in the aforementioned jurisdictions, Keytex works with dozens of electricity suppliers with end-users consumption ranging from 35 MWh to 120,000 MWh in size.

Keytex reaches prospective customers through internal marketing methods focusing on telemarketing as well as Internet marketing through its website, www.keytexenergy.com.

Keytex Energy Solutions will continue, at all times, handle customer inquiries and complaints in accordance with any and all applicable Commission rules, regulations and orders

PUC Legal Notice – Upon provision of a Docket Number from the Commission, the following will be filed with each respective newspaper as designated by the Commission

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Application of **Keytex Energy Solutions, LLC** For Approval To Offer, Render, Furnish Natural Gas Supply Services as a **Broker/Marketer** Engaged In The Business Of Brokering Natural Gas Supply Services To The Public In The Commonwealth Of Pennsylvania, Docket No. A-2013-XXXXXXX. On September 27, 2013, Keytex Energy Solutions filed an application with the Pennsylvania Public Utility Commission (“PUC”) for a license to provide natural gas supply services as a Broker of natural gas engaged in the business of providing natural gas supply services. Keytex Energy Solutions proposes to sell natural gas and related services throughout all of Pennsylvania under the provisions of the Natural Gas Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Keytex Energy Solutions 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 Keytex Energy Solutions’ attorney at the address listed below. Please include the PUC’s “docket number” on any correspondence, which is A-2013-XXXXXXX.

By and through: Sean P. Morrissey

Keytex Energy Solutions, LLC

200 Brush Run Road, Suite C, Greensburg, PA 15106 T: 724-468-6500 F: 724-468-6504

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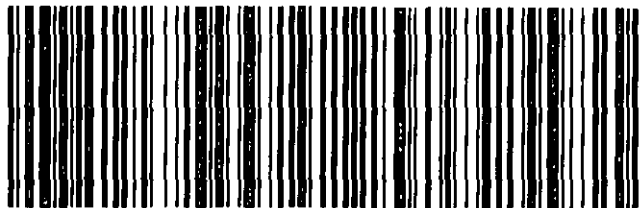
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