

Docket No. **A-2013-2380914**
Save On Energy, LLC d/b/a SaveOnEnergy.com (SOE)
Data Request

1. Reference application, SOE has submitted application with checkboxes not selected/not legible, the following pages with checkboxes must be submitted and applicable checkboxes selected:
 - a) Pages 2, 3 under 5. **Business Entity and Department of State Filing**- please submit pages with option(s) under the heading "Applicant is a" or "Applicant is a" selected.
 - b) Page 4 under 7. **Applicants Present Operations**- please submit pages with option(s) under heading "The Applicant is presently doing business in Pennsylvania as a" or "Applicant is not presently doing business in Pennsylvania" selected.
 - c) Page 5 under 8. **Applicant's Proposed Operations**- Please submit page with an option under the heading "The Applicant proposes to operate as a" selected.
 - d) Page 5 under 10. **Service Area**- applicant has indicated EGS companies in this NGS application. Per Commission guidelines a separate EGS application must be filed to be licensed for EGS territories, please submit page with only NGDC service territories from page 6 of application.
 - e) Page 5 under 11. **Customers**-please submit with checkbox(s) selected.
 - f) Page 6 under 13. Notice, please resubmit without notation "Not applicable to Save On Energy, LLC"
 - g) Page 7 under 16a. **Contact for Consumer Service and complaints**- please provide alternate person and contact information.
2. Reference application 17 b. **Financial Fitness**- Please provide proof of compliance with bonding/credit requirements for each NGDC SOE is proposing to provide service in.

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FEB 26 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



February 18, 2014

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA

RE: Docket No. A-2013-A-2013-2380914

To Whom It May Concern:

Save On Energy is in the process of gathering the requisite satisfactory letters from the suppliers whose territories we will be marketing. Consequently, we respectfully request that the Natural Gas application remain pending until these letters can be submitted.

Please feel free to contact me at jcollier@redventures.com or 704-227-9575 should you have any questions or concerns.

Kind regards,

A handwritten signature in cursive script that reads "Jennifer L. Collier".

Jenny Collier
Compliance Manager
Save On Energy, LLC

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

- * 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.

The Applicant is incorporated in the state of _____

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.

- 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.)

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.

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

Columbia Gas of Pennsylvania
Philadelphia Electric Company (PECO)

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 _____ (approximate date).

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Save On Energy, LLC

Correction:

16.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, Distribution Company, the Pennsylvania Public Utility Commission or other agencies.

Jennifer Collier

Compliance Manager

1101 Red Ventures Drive

Fort Mill, SC 29707

p/f - 704-227-9575

Docket No. **A-2013-2380918**
Save on Energy, LLC d/b/a SaveOnEnergy.com (SOE)
Data Request

1. Reference application, SOE has submitted application with checkboxes not legible, The following pages with checkboxes must be submitted and applicable checkboxes selected:
 - a) Page 3 under 2 b. **Business Entity Filings and Registration**- either one set of checkboxes under “The applicant is a:” must be selected.
 - b) Page 4 and 5 under 4. **Operations**- checkboxes under the heading “applicant’s present operations” or “The Applicant is not presently doing business in Pennsylvania” must be selected.
 - c) Page 5 under 5 b. **Applicants Proposed Operations**- applicant must select from list of options.
 - d) Page 6 under 3 d. Service Area: Applicant has indicated Natural Gas Distribution Companies (NGDC) in this Electric Generation Supplier (EGS) application. Per Commission guidelines a separate NGDC application must be filed for licensing approval in NGDC territories; please submit page with only listed EDCs available on page 8 of this application.
 - e) Page 6 under 4 e. and f. **Customers and Proposed Marketing Method**- applicant must select from options available under each heading.
 - f) Page 7 a. **Bonding**- Based on the submitted bond it appears applicant will file for a modification to the \$250,000 bond requirement, applicant must check an applicable option.

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The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- 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 (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
- Give name and address of officers.

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

a. **AFFILIATES:** Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

4. OPERATIONS

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

- The Applicant is presently doing business in Pennsylvania as a
- municipal electric corporation
 - electric cooperative
 - local gas distribution company
 - provider of electric generation, transmission or distribution services
 - Other; Identify the nature of service being rendered.

or

- The Applicant is not presently doing business in Pennsylvania.

b. **APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a *(may check multiple)*:

- Generator of electricity
- Supplier of electricity
- Aggregator engaged in the business of supplying electricity
- Broker/Marketer engaged in the business of supplying electricity services
- Electric Cooperative and supplier of electric power
- Other (Describe):

Definitions

- Supplier – an entity that sells electricity to end-use customers utilizing the jurisdictional transmission and distribution facilities of an EDC.
- Aggregator - an entity that purchases electric energy and takes title to electric energy as an intermediary for sale to retail customers.
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of electric energy but does not take title to electric energy.

c. **PROPOSED SERVICES:** Describe in detail the electric services or the electric generation services which the Applicant proposes to offer.

d. **PROPOSED SERVICE AREA:** Provide a list of each Electric Distribution Company for which the Applicant proposes to provide service.

- Allegheny Power (West Penn Power) - Penn Power
- Duquesne Light Company
- MetEd / First Energy
- Penelec / First Energy
- Pennsylvania Power & Light (PPL)
- Philadelphia Electric Company (PECO)

e. **CUSTOMERS:** Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (25 kW and Under)
- Large Commercial Customers - (Over 25 kW)
- Industrial Customers
- Governmental Customers
- All of above
- Other (Describe):

f. **PROPOSED MARKETING METHOD** (check all that apply)

- Internal – Applicant will use its own internal resources/employees for marketing
- External EGS – Applicant will contract with a PUC LICENSED EGS broker/marketer
- Affiliate – Applicant will use a **NON-EGS** affiliate marketing company and or individuals.
- External Third-Party – Applicant will contract with a **NON-EGS** third party marketing company and or individuals
- Other (Describe):

g. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using a Third Party Verification procedure?

- Yes
- No

If yes, describe the Applicant's Third Party Verification procedures.

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7. FINANCIAL FITNESS

a. **BONDING:** In accordance with 66 Pa. C.S. Section 2809(c)(1)(i), the Applicant is required to file a bond or other instrument to ensure its financial responsibilities and obligations as an EGS. Therefore, the Applicant is...

Furnishing the **original** (along with copies) of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$250,000.

Furnishing the **original** (along with copies) of another initial security for Commission approval, to ensure financial responsibility.

Filing for a modification to the \$250,000 requirement and furnishing the **original** (along with copies) of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$10,000. Applicant is required to provide information supporting an amount less than \$250,000. Such supporting information must include indication that the Applicant will not take title to electricity and will not pay electricity bills on behalf of its customers. Further details for modification may be described as well.

- *At the conclusion of Applicant's first year of operation it is the intention of the Commission to tie security bonds to a percentage of Applicant's gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. The amount of the security bond will be reviewed and adjusted on an annual basis.*
- *Example version of a bond and letter of credit are attached at Appendix D & E, Applicant's security must follow language from these examples.*
- *Any deviation from these examples must be identified in the application and may not be acceptable to the Commission.*

b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** 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.

c. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

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

C. Brent Moore

Signature of Affiant

2/25/2014

Date

From: (704) 909-2176
Brenda Rushing
Red Ventures
1091A 521 Corporate Center Dr

Fort Mill, SC 29707

Origin ID: MEOA



Ship Date: 26FEB14
ActWgt: 0.5 LB
CAD: 4516267/NET3490

Delivery Address Bar Code



SHIP TO: (704) 227-9575
Public Utility Commission
Public Utility Commission
400 N. Street
Keystone Building
HARRISBURG, PA 17120

BILL SENDER

Ref # SOE PA NGS & EGS corrections
Invoice #
PO #
Dept #

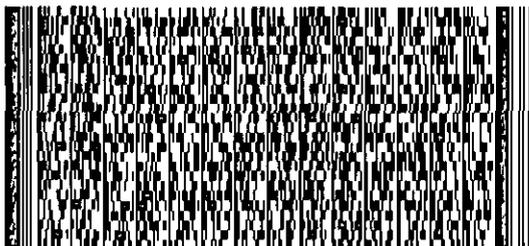
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