



1313 N Atlantic St #5000
Spokane WA 99201

800 767 4197
 509 321 0830

info@ecova.com
ecova.com

February 19, 2014

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

ATTN: Rosemary Chiavetta, Secretary

RE: Ecova, Inc. Application for Natural Gas Supplier License

Dear Ms. Chiavetta

Please be advised that Ecova, Inc. intends to amend their Natural Gas Supplier License to add two additional gas companies; Peoples TWP, LLC and Valley Energy, Inc. I am attaching revised Page 6 of our Application and a Certificate of Service adding those two gas companies.

I am also attaching revised Page 10 and Revised Appendix A Tax Certification Form pursuant to your request.

Also attached are the required bonding requirement letters.

Thank you for your consideration of Ecova's Application.

Sincerely,

DONNA WASSON
Senior Paralegal

lmw
Enclosure
cc: Jeff McCracken

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SECRETARY'S BUREAU

9. **PROPOSED SERVICES:** Generally describe the natural gas services which the Applicant proposes to offer.
Ecova, Inc. intends to provide consulting and brokering services of retail natural gas supply to end-use commercial, industrial and government customers.

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

UGI	Peoples Natural Gas Company LLC
UGI Central Penn	Equitable Gas Company
UGI Penn Natural	Columbia Gas of Pennsylvania Inc.
PECO	Peoples TWP LLC
Philadelphia Gas Works	Valley Energy, Inc.
National Fuel Gas Distribution Corp.	

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 (see below)
(approximate date).

Ecova, Inc. intends to continue providing broker services to its existing and future customers during the licensing process and after license approval.

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SECRETARY'S BUREAU

- Provide the name, title, address, telephone number and FAX number of Applicant's custodian for its accounting records. **Carol Schroeder, Interim Controller, 1313 N. Atlantic, Suite 5000, Spokane, WA 99201 (509) 329-7855**

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 12**
- A copy of any Federal energy license currently held by the Applicant. **N/A**
- Proposed staffing and employee training commitments. **See Attachment 13. Employees are fully trained and highly experienced.**
- Business plans. **See Attachment 14**

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. **Agreed**

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. **Agreed**

21. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission or the Department of Revenue, as appropriate: **Agreed**

- 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. **Agreed**

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. **Agreed**

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

Applicant: ECOGA, Inc.

By: Carol Schroeder

Title: Interim Controller

APPENDIX A

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

TAX CERTIFICATION STATEMENT

A completed Tax Certification Statement must accompany all applications for new licenses, renewals or transfers. Failure to provide the requested information and/or any outstanding state income, corporation, and sales (including failure to file or register) will cause your application to be rejected. If additional space is needed, please use white 8 1/2" x 11" paper. Type or print all information requested.

1. CORPORATE OR APPLICANT NAME ECOVA, INC.	2. BUSINESS PHONE NO. (800) 767-4197 CONTACT PERSON(S) FOR TAX ACCOUNTS: <i>Carol Schroeder</i>
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4. LICENSED ADDRESS 1313 N. ATLANTIC, SUITE 5000, SPOKANE, WA 99201	(STREET, RURAL ROUTE, P.O. BOX NO.)	(POST OFFICE)	STATE)	(ZIP)
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5. TYPE OF ENTITY	<input type="checkbox"/> SOLE PROPRIETOR	<input type="checkbox"/> PARTNERSHIP	<input checked="" type="checkbox"/> CORPORATION
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8. LIST OWNER(S), GENERAL PARTNERS, OR CORPORATE OFFICER(S)	
NAME (PRINT) SEE ATTACHED	SOCIAL SECURITY NUMBER (OPTIONAL) [][][] - [][][] - [][][][][]
NAME (PRINT)	SOCIAL SECURITY NUMBER (OPTIONAL) [][][] - [][][] - [][][][][]
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9. LIST THE FOLLOWING STATE TAX IDENTIFICATION NUMBERS. (ALL ITEMS: A, B, AND C MUST BE COMPLETED).			
A. SALES TAX LICENSE (8 DIGITS)	APPLICATION PENDING N/A	C. CORPORATE BOX NUMBER (7 DIGITS)	APPLICATION PENDING N/A
[8][9] - [4][4][2][6][5] - [1]	<input type="checkbox"/>	[2][7][2][3] [2][9][2]	<input type="checkbox"/> : <input type="checkbox"/>
B. EMPLOYER ID (EIN) (9 DIGITS)	APPLICATION PENDING N/A		
[9][1] - [1][7][0][1][0][2][8]	<input type="checkbox"/>		

10. Do you have PA employees either resident or non-resident?	X YES	<input type="checkbox"/> NO
11. Do you own any assets or have an office in PA?	X YES	<input type="checkbox"/> NO

NAME AND PHONE NUMBER OF PERSON(S) RESPONSIBLE FOR FILING TAX RETURNS		
<i>Carol Schroeder</i> PA SALES AND USE TAX <i>509-329-7855</i>	<i>Richard Beebe</i> EMPLOYER TAXES <i>509-462-8906</i>	<i>Richard Beebe</i> CORPORATE TAXES <i>509-462-8906</i>
PHONE	PHONE	PHONE

Telephone inquiries about this form may be directed to the Pennsylvania Department of Revenue at the following numbers:
(717) 772-2673, TDD# (717) 772-2252 (Hearing Impaired Only)

Ecova, Inc.
91-1701028

List of Corporate Officers

Attachment

Name	Title	SSN	Address	Telephone
Scott L. Morris	Chairman of the Board	533-72-7574	4805 E. Gleneagle, Spokane, WA 99223	509-443-2226
Jeff Heggedahl	President & Chief Executive Officer	474-90-3773	165 South Post Str. #305, Spokane, WA 99201	612-722-3983
Ed Schlect	Executive Vice President	534-72-4868	15114 E. Palomino Lane, Mica, WA 99023	509-922-7909
Gene Lynes	Executive Vice President & Chief Financial Officer	558-86-3077	11016 Valle Vista Road, Lakeside, CA 92040	619-561-1285
Donato Capobianco	Sr. Vice President & General Counsel	164-54-0926	3354 SE Stark Street, Portland, OR 97214	971-409-4352
Marian M. Durkin	Sr. Vice President	166-48-0597	1019 E. 20th Ave., Spokane, WA 99203	509-534-1460
Mark T. Thies	Sr. Vice President	479-82-8041	10602 N. Alberta Road, Spokane, WA 99208	509-443-3619
Karen S. Feltes	Sr. Vice President & Corporate Secretary	522-84-6221	2806 S. Park Road, Spokane, WA 99212	509-465-1235
Julie Kearney	Sr. Vice President - Human Resources	519-88-4663	2374 NW Birkendene Str., Portland, OR 97229	503-296-9883
Jana Schmidt	Sr. Vice President & General Manager - Sales, Client Management and UEM Delivery	449-73-8128	3175 Sugarloaf Club Dr., Duluth, GA 30097	770-622-4749
Seth Nesbitt	Sr. Vice President & General Manager - Marketing & Technology Innovation	105-66-4946	313 NW 81st Street, Seattle, WA 98117	206-782-5150
Robert Zak	Sr. Vice President - Facility Solutions Delivery	534-90-4582	4659 SE Cavalry Way, Port Orchard, WA 98367	206-713-4644
Ted Schultz	Sr. Vice President - Utility Solutions Delivery	118-54-2067	110 White Horse Drive, Mooresville, NC 28117	704-677-9866
Susan Y. Fleming	Assistant Corporate Secretary	519-86-2174	600 W. Hubbard Str. #32, Coeur d'Alene, ID 83814	208-667-1144

ECOVA, Inc
Natural Gas Supplier License Application

I, CAROL SCHROEDER, Interim Controller, 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.



CAROL SCHROEDER
Interim Controller

February 17, 2014

Donna Wasson
Ecova, Inc
Attn: Legal Department
1313 N. Atlantic, Suite 5000
Spokane, WA 99201

Dear Ecova, Inc:

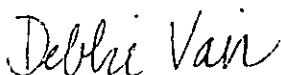
We are pleased that Ecova, Inc. has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Ecova, Inc. 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. Ecova, Inc. has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Ecova, Inc. 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 Ecova, Inc. changes in the future, Columbia Gas might deem it appropriate to require Ecova, Inc. to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4881 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,



Debbie Vair
Team Leader, Choice Programs



National Fuel

February 12, 2014

Attention: Donna Wasson (Legal Department)
Ecova, Inc
1313 N. Atlantic, Suite 5000
Spokane, WA 99201

Re: Security Requirement for Ecova, Inc:

Dear Donna,

National Fuel Gas Distribution Corporation ("NFGDC") is aware Ecova, Inc ("EI") 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, EI must furnish acceptable security to each utility where EI will do business. As such, under its tariff, NFGDC could require EI 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 EI intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, EI will never take title to any delivered natural gas.

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

Lynda W. Petrichevich
Manager, Rates and Regulatory Affairs

Peoples Service Company LLC
Phone: 412-208-6528; Fax: 412-208-6577
Email: lpetrichevich@peoples-gas.com

February 7, 2014

Donato Capobianco
SVP & General Counsel
Ecova, Inc.
1313 N. Atlantic, Suite 5000
Spokane, WA 99201

Dear Mr. Capobianco:

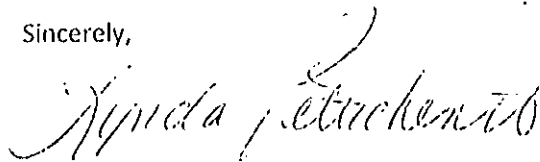
We are pleased that Ecova, Inc. has applied for a license to provide natural gas broker/marketer services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, Peoples TWP, and Peoples Natural Gas LLC – Equitable Division (“the Companies”).

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

If the creditworthiness requirement or the Company’s exposure to Ecova, Inc. provision of services on the Peoples’ system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

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

Cc: Steven Kolich
Carol Miller



An Exelon Company

February 12th, 2014

Donna Wasson
Ecova, Inc
1313 North Atlantic, Ste 5000
Spokane, WA 99201
Attn: Legal Department

Re: Bonding Requirements

Dear Donna Wasson

PECO is aware Ecova, Inc 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, Ecova, Inc could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Ecova, Inc 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 Ecova, Inc 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 Ecova, Inc or the creditworthiness requirement for PECO's exposure to Ecova, Inc changes in the future, PECO reserves the right to require Ecova, Inc 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

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

February 12, 2014

Ecova, Inc.
1313 N. Atlantic
Suite 5000
Spokane, WA 99201

Re: Security Requirement Bond for Ecova, Inc.

ATTN: Legal Department

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

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Ecova, Inc. does not need to post a bond or other form of security to operate in its service territory. If the services provided by Ecova, Inc. should change, Philadelphia Gas Works reserves the right to require security from Ecova, Inc. 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 a white background.

Raymond M. Snyder
Vice President
Gas Management

RMS:b



VALLEY ENERGY

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

February 11, 2014

Ecova, Inc.
Attn: Legal Department
1313 N. Atlantic, Suite 5000
Spokane, WA 99201

To Whom It May Concern:

We understand that Ecova, Inc. 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 Ecova, Inc. intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Ecova, Inc. will not be required to post a bond or other form of financial security instrument to provide this service in our service area. However, if the service provided or failure to meet our requirements for credit worthiness changes in the future, we reserve the right to require security from Ecova, Inc. 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



UGI Utilities, Inc.
2525 North 12th Street
Suite 360
Post Office Box 12677
Reading, PA 19612-2677
(610) 796-3400 Telephone

February 10, 2014

Ecova, Inc.
1313 North Atlantic
Suite 5000
Spokane, WA 99201

ATTENTION: Legal Department

Dear Sir/Madam:

Based on the assertion that Ecova, Inc. ("Ecova") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc. ("UGIU") has concluded that Ecova 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 Ecova will not be taking title to gas or directly serving end use customers. This conclusion is also contingent on the requirement that Ecova will be acting in conjunction with a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the respective UGI tariffs. If Ecova 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 style with some loops and flourishes.

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

DEL/rks

CERTIFICATE OF SERVICE

On this th12 day of February, 2014, I certify that a true and correct copy of Ecova, Inc.'s Application for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all attachments have been served on the following:

Peoples TWP LLC
375 North Shore Drive, Suite 600
Pittsburgh, PA 15212

Valley Energy, Inc.
523 South Keystone Avenue
Sayre, PA 18840



DONNA WASSON

RECEIVED

FEB 19 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

From: (509) 329-7108
Donna Wasson
Ecova, Inc.
1313 N. Atlantic, Suite 5000
Spokane, WA 99201

Origin ID: GEGA



Ship Date: 19FEB14
ActWgt: 0.5 LB
CAD: 102200470/NET3490

Delivery Address Bar Code



SHIP TO: (717) 783-6163 **BILL SENDER**
PA Public Utility Commission
Commonwealth of PA
ATTN: Rosemary Chiavetta, Secretary
400 North Street
HARRISBURG, PA 17120

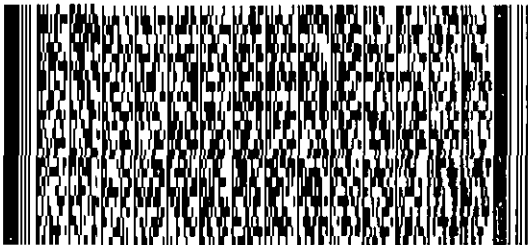
Ref # 90-5040
Invoice #
PO #
Dept # PA 90-5040

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SECRETARY'S BUREAU

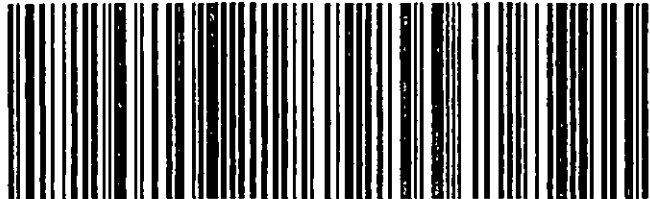
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