

COMMONWEALTH OF PENNSYLVANIA



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April 1, 2014

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

RE: Petition of PECO Energy Company for Approval of
Its Default Service Plan for the Period from June 1,
2015 through May 31, 2017
Docket No. P-2014-2409362

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Answer in the
above-captioned proceeding.

Copies have been served upon all parties of record as shown on the attached
Certificate of Service.

Sincerely,

A handwritten signature in cursive script that reads "Christy M. Appleby".

Christy M. Appleby
Assistant Consumer Advocate
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Enclosures

cc: Office of Special Assistants
Office of Administrative Law Judge
Certificate of Service

*181247

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company	:	
For Approval of its Default Service	:	
Program for the Period Service Program	:	Docket No. P-2014-2409362
For the Period from June 1, 2015 Through	:	
May 31, 2017	:	

ANSWER
OF THE
OFFICE OF CONSUMER ADVOCATE

I. Introduction

On March 10, 2014, PECO Energy Company (PECO or the Company) filed its Petition for Approval of its Default Service Plan for the Period from June 1, 2015 through May 31, 2017 (DSP III or the Program) pursuant to 66 Pa.C.S. § 2807(e) of the Pennsylvania Public Utility Code, the Default Service Regulations of the Pennsylvania Public Utility Commission (Commission), and the Commission’s Policy Statement on Default Service. PECO seeks approval for its default service program and procurement plan for the period of June 1, 2015 through May 31, 2015.

In its Petition, PECO proposes to acquire supply for residential customers by procuring the mix of laddered one-year and two-year full requirements products, with six months of spacing between the start of the contract delivery periods, a long-term product, and some spot purchases. Petition at ¶¶ 13-14. PECO proposes to purchase approximately 96% of its residential customer through the laddered one- and year-full requirements products with the remaining 4% of default service supply for residential customers from the mix of long-term products and spot purchases. Petition at ¶ 14. The winning bidders for the default service supply

contracts will also be responsible for transferring Tier I and Tier II Alternative Energy Credits (AECs) to PECO in order to meet PECO's requirements of the Alternative Energy Portfolio Standards Act (AEPS) associated with the amount of default service load served by that supplier. Id. at ¶ 29-30.

The plan for residential default service will be for a two year duration, starting on June 1, 2015 and ending on May 31, 2017. Petition at 1. No supplier will be permitted to provide more than fifty percent (50%) of the default service supply for any one of PECO's procurement classes. Id. at ¶ 26.

PECO has proposed to continue the existing DSP II Contingency Plan in the event that one or more tranches are not fully subscribed through the procurement process, or in the event that a winning bidder defaults prior to the time for delivery. For those tranches, PECO will assume the responsibility for any tranches that are unfilled in default service supply. Petition at ¶ 31. Any unfilled tranches will be procured from PJM-administered markets for energy, capacity and ancillary services. PECO will obtain sufficient AECs at market prices to satisfy the near-term obligations under the AEPS Act. Id. PECO proposes that if the default occurs within a reasonable time before a scheduled procurement, the unfilled tranches will be included in PECO's next scheduled procurement. Id. at ¶ 32. Alternatively, PECO will file a plan with the Commission regarding alternative procurement options and a request for approval of the plan on an expedited basis. Id.

PECO proposes to modify its rate design and cost recovery mechanism. To recover the costs for serving residential customers, PECO proposes to continue its quarterly adjusting of the Generation Supply Adjustment (GSA). For the over-and under-collection component of the

GSA reconciliation mechanism, PECO proposes to change from a quarterly reconciliation to a semi-annual reconciliation for residential customers. Id. at ¶ 35.

PECO's filing proposes to continue the Standard Offer Program and to commence several new programs including a Seamless Moves Program, Instant Connect Program, and allow new customer account number access for EGSs. Petition at ¶¶ 38-39.

II. Answer

The OCA has preliminarily reviewed the Company's Petition and identified a number of issues presented by the filing. The OCA anticipates that additional issues will arise as a more comprehensive review of PECO's filing is undertaken and after discovery is conducted. The preliminary issues identified by the OCA include:

A. Default Service and Implementation Plans

1. Procurement Classes, Program Term, and Supply Portfolio

In DSP III, PECO proposes to continue the basic procurement strategy used in in the DSP II case of a blend of laddered one year and two year full requirements contracts for residential customers. Petition at ¶¶ 12-14. These purchases will comprise approximately 96% of PECO's purchases. Id. at ¶ 14. The remaining four percent (4%) of the default service supply portfolio will consist of a mix of long-term products of more than four years, and spot market purchases. Id.

PECO states that it does not propose further procurement of block energy products for the residential customer class. Petition at ¶ 15. PECO proposes to replace the 50 MW block energy contract that expires on December 31, 2015 with a four-year, five-month full requirements product that is split into two tranches for approximately 3.2% of the residential customer default

service load. Id. The remaining approximately 1% of residential customer supply will be procured directly from the spot energy markets operated by PJM Interconnection, LLC. Id.

The OCA submits that further evaluation is necessary to determine whether the proposed purchasing plan will provide the least cost over time for residential customers in accord with the requirements of Act 129. The OCA intends to examine the type and mix of resources, as well as the procurement methodologies, to ensure that the products and the plan are designed to meet the requirements of Act 129.

2. Competitive Bid Solicitation Process and Independent Evaluator

PECO proposes to solicit bids for default service supply beginning in February 2015, before the end of DSP II, and extend over the DSP III term to avoid problems associated with procuring significant amounts of supply at a single point in time when prices may be the highest. Petition at ¶ 25. PECO proposes to again use NERA as the independent third-party evaluator. Id. at ¶ 26. The Request for Proposal (RFP) would require that no supplier be permitted to provide more than fifty percent of the default service supply for any one of PECO's procurement classes. Id.

The Commission should review the Company's proposed RFP and the solicitation process to ensure that the contracts are procured in the most effective manner in compliance with the Commission's regulations.

3. Consistency with Regional Transmission Organization Requirements

PECO also states that its program is "consistent with the legal and technical requirements pertaining to the generation, sale and transmission of electricity of the [regional transmission organization] in whose control area the DSP is providing service." Petition at ¶ 28; 52 Pa. Code § 54.185(d)(4). PECO's Supplier Master Agreements (SMA) will continue to impose

requirements on both PECO and its suppliers to maintain specific qualifications under applicable PJM agreements and rules and all other regulatory authorizations necessary to perform the contractual obligations. Suppliers seeking to provide default service must be able to establish that they can fulfill the technical and regulatory requirements of the SMA, including demonstration that there is no impediment to becoming a “load serving entity” (LSE) under PJM’s rules. Id. at ¶ 28.

The Commission should carefully examine the Company’s proposed procedures to ensure that potential suppliers meet all technical and regulatory requirements as necessary under PJM’s rules.

4. AEPS Compliance

PECO avers that it will continue to satisfy its AEPS Act obligations by requiring each full requirements default service supplier to transfer Tier I and Tier II alternative energy credits (AECs) to PECO. The AEC credits will correspond to PECO’s obligations associated with the amount of default service load served by that supplier. Petition at ¶ 29. In addition, PECO proposes to continue to allocate AECs obtained through prior AEPS procurements towards suppliers’ obligations under the SMA in accord with the percentage of load served by each supplier. Id. at ¶ 30. PECO avers that it will retain a percentage of the AECs to meet its AEPS requirements associated with the remaining portion of the PECO share of the residential customer load served in accordance with its first default service program. Id. PECO also plans to buy and sell additional AECs as needed in order to be able to meet the AEPS requirements and to manage its inventory of AECs obtained in prior Commission-approved procurements. Id.

The OCA submits that this methodology should be examined to determine whether it produces the lowest reasonable cost for alternative energy credits and whether it appropriately supports the development of the alternative requirements needed under the AEPS Act.

B. Contingency Plans

PECO proposes that it will assume responsibility of the LSE for any tranches that are unfilled in default serve procurement or the event that PECO experiences a supplier default under the SMA. Petition at ¶¶ 31-32. For those tranches, PECO avers that it will procure default service supply from PJM-administered markets for energy, capacity and ancillary services. PECO will obtain sufficient AECs at market prices to satisfy the near-term obligations under the AEPS Act. Id. PECO proposes that if the default occurs within a reasonable time before a scheduled procurement, the unfilled tranches will be included in PECO's next scheduled procurement. Id. at ¶ 32. Alternatively, PECO will file a plan with the Commission regarding alternative procurement options and a request for approval of the plan on an expedited basis. Id.

C. Rate Design and Cost Recovery

PECO proposes to continue its existing rate design with one modification to the reconciliation process to improve price signals to customers and assurance of cost recovery for the retail market enhancement program that was suspended during DSP II and any additional retail market enhancements directed by the Commission during DSP III. Petition at ¶¶ 33-34, 36-37.

Under DSP II, PECO adjusted and reconciled the GSA for its default service rates on a quarterly basis for residential customers. Id. at ¶ 34. Under the DSP III, PECO proposes to continue to adjust the cost of generation supply on a quarterly basis, but the GSA reconciliation mechanism will change from a quarterly reconciliation to a semi-annual reconciliation for the

over-and under-collection component for residential customers. Petition at ¶ 35. PECO avers that the current timing of the reconciliation mechanism, in combination with the billing cycle lag and seasonal variations, results in swings in the over- and under-collection component of the GSA that are unrelated to the costs of default service supply. Id. The OCA submits that the details of PECO’s proposed reconciliation mechanism should be examined to ensure that it is consistent with the Public Utility Code, applicable regulations concerning reconciliation mechanisms and sound ratemaking principles.

PECO also proposes “limited tariff changes” related to the recovery of costs incurred by PECO to implement additional retail market enhancements directed by the Commission and costs associated with the retail opt-in program suspended during DSP II. Petition at ¶ 36. The OCA submits that the details of these “limited tariff changes” and the proposed cost recovery for additional retail market enhancements and for the costs associated with the retail market enhancement program suspended during DSP II should be examined to ensure that they are consistent with the Public Utility Code, applicable regulations and Commission Orders, and sound ratemaking principles.

Finally, “in light of the Commission’s End State Order and its consideration of possible changes to the current default service model,” PECO requests full and current cost recovery of all DSP III costs incurred. Petition at ¶ 37. The OCA submits that any cost recovery permitted should be examined to ensure that it is consistent with the Public Utility Code, applicable regulations and Commission Orders, and sound ratemaking principles.

D. Retail Market Enhancements

1. Standard Offer Program

PECO proposes to continue the DSP II Standard Offer Program and to continue the cost recovery mechanism established in the DSP II program. The cost recovery established in the DSP II program provided that costs would be recovered through an EGS participant fee of \$30 per enrolled customers, with any remaining costs recovered: (1) fifty percent from the EGSs through a 0.2% Purchase of Receivables discount and (2) fifty percent from residential and small commercial default service customers via the GSA. Petition at ¶ 38. The OCA submits that the DSP II Standard Offer program results should be carefully reviewed to determine whether any modifications to the program are necessary. In addition, the cost recovery for the Standard Offer Program should be reviewed.

2. Seamless Moves

PECO plans to implement the Seamless Moves program by June 1, 2015 pursuant to the Commission's End State Order. Petition at ¶ 39; End State Order at 74-75. PECO proposes to develop a new Electronic Data Interchange move transaction to allow the acceptance of an EGS customer enrollment request on a "pending active" customer account "that is set to be active at a specified date in the future rather than placing the customer on default service during the brief period before the account becomes active." Id. PECO avers that once this has been sent to the EGS, the EGS can begin service on the new account seamlessly on the start date. Id.

The OCA submits that the Commission should review this proposal and the costs of this proposal.

3. Instant Connect

PECO proposes that with the seamless moves changes, customers will be able to select an EGS at the time they establish a new account. Petition at ¶ 39. At the time of the set-up of the new account, PECO will provide the customer with a new account number and EGS shopping information. Id. Upon selection and with eleven days' notice, the EGS can then submit an enrollment transaction to PECO with the seamless moves' "pending active account" status to implement the instant connect. Alternatively, if eleven days' notice is not provided, PECO will ensure that the EGS is made the service provider as soon as possible. Id.

The OCA submits that the Commission should review this proposal and the associated costs.

4. Customer Account Number Access for EGSs

PECO proposes to enhance its existing passcode-protected Supplier Choice Energy Systems Solution (SUCCESS) website portal to add a feature that will allow EGSs to submit account number requests when information is not available from the customer or PECO's Eligible Customer List (ECL) by uploading a "delimited file." Petition at ¶ 39. PECO provides that once a request is received from the EGS, PECO will then deliver the file back within seconds with an appended response tailored to the search results for the individual file inquiry. Id. PECO proposes to roll out this feature during the DSP III term to allow EGS marketing at public locations and community events where customers do not typically have account information available to obtain the information to complete the on-site enrollment. Id.

The OCA submits that the proposal should be carefully reviewed to determine whether it is reasonably designed to protect consumer privacy and whether it is consistent with the Public Utility Code and applicable regulations and Commission Orders.

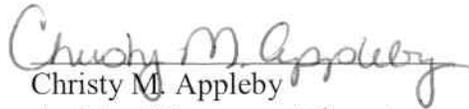
E. Procedural Issues

PECO provides a proposed procedural schedule in its Petition. Petition at ¶ 41. The OCA will work with all parties to develop a mutually agreeable procedural schedule.

III. Conclusion

WHEREFORE, the Office of Consumer Advocate respectfully requests that this matter be set for hearings. Hearings are necessary to ensure that the default service rates that will be charged starting June 1, 2015 are just and reasonable and otherwise consistent with Pennsylvania law.

Respectfully Submitted,



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DATE: April 1, 2014
181023.doc

CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company for Approval of Its Default Service Plan for the
Period from June 1, 2015 through May 31, 2017
Docket No. P-2014-2409362

I hereby certify that I have this day served a true copy of the foregoing document,
the Office of Consumer Advocate's Answer, upon parties of record in this proceeding in
accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in
the manner and upon the persons listed below:

Dated this 1st day of April 2014.

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2790 Mosside Boulevard
Suite 225
Monroeville, PA 15146

Global Energy Solutions Corporation
675 Featherbed Lane
Garnet Valley, PA 19060

Global Vision Energy, LLC
1738 Creekview Drive
Fogelsville, PA 18051

Good Energy, L.P.
232 Madison Avenue
Suite 405
New York, NY 10016

Great American Power, LLC
2959 Cherokee Street
Suite 202
Kennesaw, GA 30144

Green Mountain Energy Company
P.O. Box 689008
Austin, TX 78768

Groom Energy Solutions, LLC
96 Swampscott Road
Salem, MA 01970

Groundswell of PA
1156 15th Street, N.W.
Suite 840
Washington, DC 20005

Guttman Energy, Inc.
200 Speers Street
Belle Vernon, PA 15012

H.P. Technologies, Inc.
33648 St. Francis Drive
Avon, OH 44011

Hawk Energy Corporation
38 Souderton Pike
Souderton, PA 18964

HB Hayes & Assoc. LLC d/b/a
Alternative Energy Source
8225 Farnsworth Road
Suite A10
Waterville, OH 43566

Health Resource Network, Inc.
d/b/a HRNEnergy
201 Columbia Turnpike
Florham Park, NJ 07932

HealthTrust Purchasing Group, LP
155 Franklin Road
Suite 400
Brentwood, TN 37027

Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095

Hess Small Business Services, LLC
One Hess Plaza
Woodbridge, NJ 07095

HIKO Energy, LLC
12 College Road
Suite 100
Monsey, NY 10952

Hospital Energy, LLC
110 Riverview Drive
Guilford, CT 06437

Hudson Energy Services, LLC
4 Executive Boulevard
Suite 301
Suffern, NY 10901

IDT Energy, Inc.
550 Broad Street
Newark, NJ 07102

Independence Energy Group, LLC
3711 Market Street, #10
Philadelphia, PA 19104

Insight Energy, LLC
11207 Rosewood
Leawood, KS 66211

Integrity Comm. of OH, LLC
d/b/a Integrity Energy
5711 Grant Avenue
Cleveland, OH 44105

Intelligen Resources, LP
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Fort Worth, TX 76107

Interstate Gas Supply
d/b/a IGS Energy
1379 Butter Churn Drive
Herndon, VA 20170

HOP Energy, LLC
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White Plains, NY 10604

Hovey Energy, LLC
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Chicago, IL 60618

I.C. Thomasson Associates, Inc.
2950 Kraft Drive
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Nashville, TN 37204

Incite Energy, LLC
20 East Greenway Plaza
Suite 400
Houston, TX 77046

Infinity Power Partners, LLC
1990 Post Oak Boulevard
Suite 2450
Houston, TX 77056

InSource Power, Inc.
376 Boylston Street
Suite 203
Boston, MA 02116

Integrays Energy Services
Rosslyn Metro Center
Suite 1105
1700 Moore Street
Arlington, VA 22209

Interstate Gas Marketing, Inc.
2018 South 6th Street
Indiana, PA 15701

InVado International, LLC
9826 E Washington Street
Chagrin Falls, OH 44023

Iron Energy LLC d/b/a
Kona Energy
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Austin, TX 78759

Just Energy Pennsylvania Corporation
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Downingtown, PA 19335

Keytex Energy Solutions, LLC
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Greensburg, PA 15601-8757

L5E
130 East John Carpenter Freeway
Irving, TX 75062

Liberty Power Delaware, LLC
1901 West Cypress Creek Road
Suite 600
Ft. Lauderdale, FL 33309

Lincoln Energy Group, LLC
414 North Orleans Street
Suite 500
Chicago, IL 60654

Little Deep LLC d/b/a Power USA
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New York, NY 10022

Lower Electric, LLC
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Dallas, TX 75230

Kenneth East Ryan d/b/a Switch Energy
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Boston, MA 02116

Kevin J. Cobb & Associates
d/b/a Quest Energy Solutions
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Auburn, MA 01501

Kinetic Energy Associates, LLC
100 North Tenth Street
Harrisburg, PA 17101

LD Energy, LLC d/b/a LD Energy
11 West Passaic Street
Rochelle Park, NJ 07662-3225

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1901 West Cypress Creek Road
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Fort Lauderdale, FL 33309

Linde Energy Services, Inc.
1 Greenwich Street
Suite 200
Stewartsville, NJ 08886

Live Energy, Inc.
1124 Glade Road
Suite 140
Colleyville, TX 76034

Luthin Associates, Inc.
535 Main Street
Allenhurst, NJ 07711

LVI Power, LLC
1414 Hey Highway
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Mablock Consulting, LLC
d/b/a Lock Group
2727 LBJ Freeway
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Manhattan Energy, LLC
80 Broad Street
5th Floor
New York, NY 10004

McEnergy, Inc.
97 Forrest Avenue
Massapequa, NY 11758

Mid Atlantic Energy Services, LLC
207 5th Street
Vandling, PA 18421

Mint Energy, LLC
One Rounder Way
Suite 220
Burlington, MA 01803

Mobilenet Inc. d/b/a Smith Energy Group
1119 Sandstone Road
Greensburg, PA 15601

Moxi Energy Advisors LLC
1210 Heather Knoll Lane
Media, PA 19063

Muirfield Energy, Inc.
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Dublin, OH 43017-5347

Make The Switch USA, LLC
13 Great Meadow Road
Redding, CT 06896

Mark Group, Inc.
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Philadelphia, PA 19112

Metromedia Power, Inc.
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Eatontown, NJ 07724

MidAmerican Energy Company
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Des Moines, IA 50306-0657

Mitchell Energy Management
610 Berwick Road
Wilmington, DE 19803-2204

Mondre Energy, Inc.
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Suite 1504
Philadelphia, PA 19103

MP2 Energy NE, LLC
Waterway Avenue
Suite 625
The Woodlands, TX 77380

National Energy Management, LLC
12407 North Mo Pac Expressway
Suite 100-348
Austin, TX 78758

National Utility Service, Inc.
1 Maynard Drive
Park Ridge, NJ 07656-1879

Nationwide New Energy Management Group,
LLC
P.O. Box 3077
McKinney, TX 75070

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Business
5326 Yacht Haven Grande
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NextEra Energy Services Pennsylvania, LLC
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Juno Beach, FL 33408-0420

Nordic Energy Services, LLC
One Tower Lane
Suite 300
Oakbrook Terrace, IL 60181

North East Energy Consultants, LLC
5 Evergreen Drive
Voorhees, NJ 08043

Northeast Energy Advisors, LLC
10900 Perry Highway #210
Pittsburgh, PA 15090

NRGING LLC d/b/a
Netgain Energy Advisors
6176 Grovedale Court
Suite 200
Alexandria, VA 22310

Option One Energy, LLC
321 North Clark Street
5th Floor
Chicago, IL 60654

National1 Energy, LLC
2701 East President George Bush Highway
Suite 210
Plano, TX 75074

Natures Current, LLC
95 Fairmount Avenue
Philadelphia, PA 19123

New River Group, LLC d/b/a
Scioto Energy
4041 North High Street
Suite 202
Columbus, OH 43214

Noble Americas Energy Solutions, LLC
401 West A Street
Suite 500
San Diego, CA 92101

North American Power and Gas, LLC
20 Glover Avenue
Norwalk, CT 06850

North Shore Energy Consulting, LLC
7160 Chagrin Road
Suite 100
Chagrin Falls, OH 44023

Northeast Energy Partners, LLC
174 South Road
Enfield, CT 06082

On-Demand Energy, Inc.
500 Cherrington Parkway
Suite 400
Moon Township, PA 15108

Options Consulting Services
7300 International Drive
Holland, OH 43528

Palmco Power PA, LLC
1350 60 Street
Brooklyn, NY 11219

Park Power, LLC
150 North Radnor Chester Road
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Radnor, PA 19087

Patriot Energy Group, Inc.
1 Rounder Way
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Burlington, MA 01803

Pepco Energy Services, Inc.
d/b/a PowerChoice
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Arlington, VA 22209

PES Brokers, Inc.
1305 FM 359
Suite H
Richmond, TX 77469

Platinum Advertising II, LLC
4911 East Street Road
Suite A
Trevose, PA 19053

Power Brokers, LLC d/b/a
PB2 Texas, LLC
2929 Carlisle Street
#375
Dallas, TX 75204

Power Target LLC
211 Black Angus Court
Millersville, MD 21108

Premier Energy Group, LLC
1275 Bound Brook Road
Suite 6
Middlesex, NJ 08846

Paragon Advisors, LLC
781 Boston Post Road
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Madison, CT 06443

Patch Energy Services, LLC
11030 Martha Ann Court
Fairfax Station, VA 22039

Pennell & Wiltberger, Inc.
10 Melrose Avenue
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Cherry Hill, NJ 08003

Perigee Energy, LLC
3 Sugar Creek Center Boulevard
Suite 450
Sugar Land, TX 77478

Planet Energy (Pennsylvania), Corporation
5255 Yonge Street
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Plymouth Rock Energy, LLC
1074 Broadway
Woodmere, NY 11598

Power Management Co., LLC
1600 Moseley Road
Victor, NY 14564

PPL EnergyPlus, LLC
P.O. Box 25225
Lehigh Valley, PA 18002

Premier Power Solutions, LLC
107 Breckenridge Street
Grove City, PA 16127

Priority Power Management, LLC
310 West Wall
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Midland, TX 79701

Pro-Star Energy Services, LLC
1021 Main Street
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Public Power, LLC
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Garden City, NY 11530

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Stamford, CT 06905

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t/a RMI Energy, Inc.
230 South LaSalle
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Chicago, IL 60604

Prospect Resources, Inc.
8170 McCormick Boulevard
Suite 107
Skokie, IL 60076

Provident Energy Consulting, LLC
107 Chelsey Drive
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Media, PA 19063

Reflective Energy Solutions, LLC
1 University Plaza, #407
Hackensack, NJ 07601-6204

Reliable Power, LLC
340 Madison Avenue
19th Floor
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Rescom Energy, LLC
20 East Avenue
Bridgeport, CT 06610

Respond Power, LLC
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Suite 310
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RJT Energy Consultants, LLC
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North Haven, CT 06473

Rosenthal Energy Advisors, Inc.
1412 Main Street
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Dallas, TX 75202

RPA Energy, Inc.
304 Indian Trace
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Weston, FL 33326

Santanna Natural Gas Corp. d/b/a
Santanna Energy Services
7701 San Felipe Boulevard
Suite 200
Austin, TX 78729

Save Wave Energy, LLC
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Chicago, IL 60654

School Power, Inc.
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Satori Energy
815 West Superior Street
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SBR Energy LLC d/b/a
Silver Bear Energy
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Greenwich, CT 06830

Secure Energy Solutions, LLC
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Shimshek Energy, LLC
1005 South Bee Street
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Shiple Energy Company
415 Norway Street
York, PA 17403

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SourceOne Energy, Inc.
132 Canal Street
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Palm Harbor, FL 34684

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Louisville, KY 40223

Sunwave Gas and Power Pennsylvania, Inc.
20 Marshall Street
Suite 300
Norwalk, CT 06854

Sustainable Star, LLC
3060 Mitchellville Road
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Bowie, MD 20716-1397

Taylor Consulting and Contracting, LLC
625 Main Street
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Texas Retail Energy, Inc.
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Bentonville, AR 72716

Spark Energy, LP
2105 City West Boulevard
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Sprague Operating Resources, LLC
2 International Drive
Suite 200
Portsmouth, NH 03801

Stream Energy Pennsylvania, LLC (Ignite)
P.O. Box 7287
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Suncom Energy, Inc.
1410 Northeast 26th Avenue
Fort Lauderdale, FL 33304

Superior Plus Energy Services, LLC
224 Valley Creek Boulevard
Exton, PA 19341

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14027 Memorial Drive
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Houston, TX 77079

Technology Resource Solutions, Inc.
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600 Willowbrook Office Park
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TES Energy Services, LP
17480 Dallas Parkway
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Texzon Utilities, Ltd.
204 N 1-35
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Red Oak, TX 75154

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680 Washington Boulevard
Stamford, CT 06901

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John Tobelmann
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Quincy, MA 02169

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P.O. Box 131615
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Atlanta, GA 30305

The Legacy Energy Group, LLC
d/b/a Legacy Energy
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Warrenton, VA 20186

Total Energy Resources, LLC
120 Marguerite Drive
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Transparent Electric, Inc.
2642 Van Ness Avenue
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San Francisco, CA 94109

Tritium Energy Consulting, LLC
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San Antonio, TX 78216

U.S. Gas and Electric
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290 N.W. 165th Street
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Ultimate Energy Advisors, LLC
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Unified Energy Services, LLC
3900 Essex
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University of Pennsylvania
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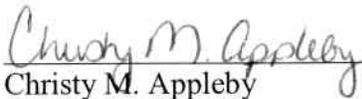
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