

Rosemary Chiavetta, Secretary

May 28, 2014

Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

RE: Docket No. A-2014-24100980  
Utility Code: 1216406

Dear Ms. Chiavetta,

Please find attached Infinity Power Partners, LLC response to Mr. Gill's letter of May 8 addressing the following:

Docket No. A-2014-2410980

Infinity Power Partners LLC.  
Data Request

1. Reference application, Section 10. **Service Area** Applicant has indicated "All of Pennsylvania". Applicant is advised to resubmit page 3 with applicable service areas from table on page 4 of application indicated. (Bonding letters must be submitted for each proposed natural gas distribution company service territory in which applicant is proposing to establish business; per 17.b-proof of compliance with bonding)
2. Reference application, Section 16. a **Contacts for Consumer Service and Complaints** Applicant indicated "not applicable for an applicant applying for a license exclusively as a broker/marketer". Applicant is advised to resubmit page 6 of application without this notation, please 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.

Please advise should further information or details be required.

Sincerely,



Ron Fort

Director of Risk Management

Infinity Power Partners, LLC

2603 Augusta Dr., Suite 450

Houston, TX 77057

[ron@infinitypowerpartners.com](mailto:ron@infinitypowerpartners.com)

(Office) 713.559.0554 (Cell) 713.882.1117 (Fax) 832.623.6687

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Verification

I, Peter Selber, 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).

  
\_\_\_\_\_  
Peter Selber, Managing Partner  
Infinity Power Partners, LLC

5/28/14  
Date

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

<p><b>Valley Energy Inc.</b>          Robert Crocker          523 South Keystone Avenue          Sayre, PA 18840-0340          PH: 570.888-9664          FAX: 570.888.6199          email: <a href="mailto:rcrocker@ctenterprises.org">rcrocker@ctenterprises.org</a></p>	<p><b>National Fuel Gas Distribution Corp.</b>          David D. Wolford          6363 Main Street          Williamsville, NY 14221          PH: 716.857.7483          FAX: 716.857.7479          email: <a href="mailto:wolfordd@natfuel.com">wolfordd@natfuel.com</a></p>
<p><b>UGI Central Penn</b>          David Beasten          2525 N. 12<sup>th</sup> Street, Suite 360          Reading, PA 19612-2677          PH: 610.796.3425          FAX: 610.796.3559</p>	<p><b>Peoples Natural Gas Company LLC</b>          Lynda Petrichevich          375 North Shore Drive, Suite 600          Pittsburgh, PA 15212          email: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a>          PH: 412.208.6528          FAX: 412.208.6577</p>
<p><b>Peoples TWP LLC (Formerly T. W. Phillips)</b>          Andrew Wachter          375 North Shore Drive, Suite 600          Pittsburgh, PA 15212          PH: 724.431.4935          FAX: 724.287.5021          email: <a href="mailto:Andrew.Wachter@peoplestwp.com">Andrew.Wachter@peoplestwp.com</a></p>	<p><b>UGI</b>          David Beasten          2525 N. 12<sup>th</sup> Street, Suite 360          Reading, PA 19612-2677          PH: 610.796.3425          FAX: 610.796.3559</p>
<p><b>UGI Penn Natural</b>          David Beasten          2525 N. 12<sup>th</sup> Street, Suite 360          Reading, PA 19612-2677          PH: 610.796.3425          FAX: 610.796.3559</p>	<p><b>Equitable Gas Company</b>          Jerald Moody          225 North Shore Drive          Pittsburgh, PA 15212-5352          PH: 412.395.3209          FAX: 412.395.3335</p>
<p><b>PECO</b>          Carlos Thillet, Manager, Gas Supply and Transportation          2301 Market Street, S9-2          Philadelphia, PA 19103          email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a>          PH: 215.841.6452</p>	<p><b>Columbia Gas of Pennsylvania Inc.</b>          Thomas C. Heckathorn          200 Civic Center Drive          Columbus, OH 43215          PH: 614.460.4996          FAX: 614.460.6442          email: <a href="mailto:theckathorn@nisource.com">theckathorn@nisource.com</a></p>
<p><b>Philadelphia Gas Works</b>          Douglas Moser          800 West Montgomery Avenue          Philadelphia, PA 19122          email: <a href="mailto:douglas.moser@pgworks.com">douglas.moser@pgworks.com</a>          PH: 215.684.6899</p>	

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.

Charles Nguyen-Phuoc, Director of Operations  
Infinity power Partners, LLC  
2603 Augusta Dr., Suite 2603  
Houston, TX 77057  
Office – 713-559-0555  
Fax – 832-623-6687  
[Charles@infinitypowerpartners.com](mailto:Charles@infinitypowerpartners.com)

Alternate contact person:

Peter Selber, Managing Partner  
Infinity power Partners, LLC  
2603 Augusta Dr., Suite 2603  
Houston, TX 77057  
Office – 713-559-0551  
Fax – 832-623-6687  
[peter@infinitypowerpartners.com](mailto:peter@infinitypowerpartners.com)

17. 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.

Please see attached.

natural gas distribution companies	letter
Valley Energy Inc.	x
National Fuel Gas Distribution Corp.	x
UGI Central Penn	x
UGI	x
UGI Penn Natural	x
Peoples Natural Gas Company LLC	x
Peoples TWP LLC (Formerly T. W. Phillips)	x
Equitable Gas Company (Peoples)	x
PECO	x
Columbia Gas of Pennsylvania Inc.	x
Philadelphia Gas Works	x



# VALLEY ENERGY

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

May 15, 2014

## VIA EMAIL

Mr. Ron Fort  
Infinity Power Partners, LLC  
2603 Augusta Dr., Suite 450  
Houston, TX 77057  
[ron@infinitypowerpartners.com](mailto:ron@infinitypowerpartners.com)

Dear Mr. Fort:

We understand that Infinity Power Partners, LLC 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 Infinity Power Partners, LLC intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Infinity Power Partners, LLC 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 Infinity Power Partners, LLC 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



**National Fuel**

May 15, 2014

Infinity Power Partners, LLC  
ATTN: Ron Fort  
2603 Augusta Dr., Suite 450  
Houston, TX 77057

Re: Security Requirement for Infinity Power Partners, LLC:

Dear Ron,

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

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



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

May 21, 2014

Ron Fort  
Director of Risk Management  
Infinity Power Partners, LLC  
2603 Augusta Dr., Suite 450  
Houston, TX 77057

RE: Infinity Power Partners, LLC application to serve as a broker/marketer

Dear Mr. Fort,

Based on your assertion that Infinity Power Partners, LLC ("INFINITY") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities Inc. ("UGIU") has concluded that INFINITY 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 INFINITY will not be taking title to gas or directly serving end use customers. This also assumes that INFINITY will be acting on the behalf of a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the respective UGIU tariffs. If INFINITY 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 fluid and cursive, written over a white background.

David E. Lahoff  
Manager, Tariff & Supplier Administration  
UGI Utilities, Inc.

**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](mailto:lpetrichevich@peoples-gas.com)

May 12, 2014

Ron Fort  
Director of Risk Management  
Infinity Power Partners, LLC  
2603 Augusta Dr., Suite 450  
Houston, TX 77057

Dear Mr. Fort:

We are pleased that Infinity Power Partners, LLC 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”).

Infinity Power Partners, LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Infinity Power Partners, LLC 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 Infinity Power Partners, LLC 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](mailto: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

May 22, 2014

Ron Fort  
Infinity Power Partners, LLC  
2603 Augusta Dr., Suite 450  
Houston, TX 77057

Re: Bonding Requirements

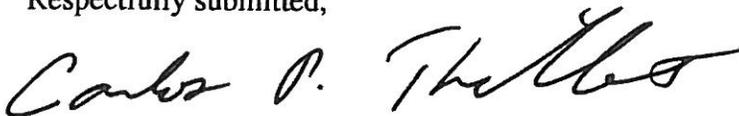
Dear Ron Fort:

PECO is aware that Infinity Power Partners, LLC has applied for a license to provide brokering and consulting services to residential, commercial and industrial customers on the distribution system of PECO.

In making such an application, Infinity Power Partners, LLC could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Infinity Power Partners, 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 Infinity Power Partners, LLC does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by Infinity Power Partners, LLC or the creditworthiness requirement for PECO's exposure to Infinity Power Partners, LLC changes in the future, PECO reserves the right to require Infinity Power Partners, 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 black ink that reads "Carlos P. Thillet". The signature is written in a cursive style with a large, stylized initial "C".

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

January 23, 2014

Peter Selber  
Managing Partner  
Infinity Power Partners, LLC  
1990 Post Oak Blvd., Suite 2450  
Houston, TX 77056

Dear Mr. Selber:

We are pleased that Infinity Power Partners, LLC (“Infinity Power Partners, LLC”) 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, Infinity Power Partners, LLC 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. Infinity Power Partners, LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Infinity Power Partners, LLC 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 Infinity Power Partners, LLC changes in the future, Columbia Gas might deem it appropriate to require Infinity Power Partners, LLC 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



May 16, 2014

Ron Fort  
Director of Risk Management  
Infinity Power Partners  
2603 Augusta Drive  
Suite 450  
Houston, TX 77057

Re: Security Requirement for Infinity Power Partners, LLC,

Dear Ron:

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

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

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

Kind Regards,

A handwritten signature in blue ink, appearing to read "Raymond M. Snyder", is written over the typed name below.

Raymond M. Snyder  
VP, Gas Management