



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

April 3, 2014

Docket No. A-2014-2407334

SHAYNA DESAI  
TRUSTED ENERGY LLC  
150 GRAND ST 4<sup>TH</sup> FL  
WHITE PLAINS NY 10601

RE: Application of Trusted Energy LLC to Become a Licensed Supplier of  
Natural Gas as a Broker/Marketer.

Dear Ms. Desai:

On February 26, 2014, Trusted Energy LLC application for a Natural Gas Supplier license was accepted for filing and docketed with the Public Utility Commission. The application was incomplete. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached question(s).

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) working days** from the date of this letter. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission    or  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

I, Nathan Cartwright, 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).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite completion of the application, please fax or e-mail the information to Lee Yalcin at (717) 787-6723 or [lyalcin@pa.gov](mailto:lyalcin@pa.gov) respectively. Please direct any questions to Lee Yalcin, Bureau of Technical Utility Services, at (717) 787-6723.

Sincerely,



Darren D. Gill, Deputy Director  
Bureau of Technical Utility Services

Enclosure

cc: Lee Yalcin

Docket No. A-2014-2407334  
Trusted Energy, LLC  
Data Request

- 1) Reference Application page 6 under 10. **Service Area-** Applicant must indicate NGDC service territories from list outlined on page 7. Please submit page 6 with NGDCs indicated from page 6 of application.
- 2) Reference Application page 9 under 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, the Distribution Company, the Pennsylvania Public Utility Commission or other agencies. Please resubmit page 9 with alternate contact person for addressing customer complaints indicated.
- 3) Reference Application page 9 under 17 b. **Financial Fitness:** 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 submit proofs of bonding letter for NGDC territories in which applicant wishes to be licensed.

9. **PROPOSED SERVICES:** Generally describe the natural gas services which the Applicant proposes to offer.

We broker energy deals (Natural Gas and Electricity) for our clients (Small, Mid-Sized and Large Corporations) to find them the best pricing available for their usage requirements. We obtain a electric or gas bill copy and complete a credit request form for our suppliers to have all the needed information on our clients as well as the copy of their electric or gas bill to start the pricing process. Once we have credit approved and pricing back we make a full presentation to our clients along with approved state agreements from our suppliers to lock in the best pricing for our clients with their approval.

Once a signed agreement is sent in to us we submit it to our suppliers for processing. With all of our clients we are able to also after the sale provide them with customer service assistance acting as a liaison between them and the supplier. We send out follow up emails quarterly to check in with our clients and make sure that everything is going ok and to see if they need anything.

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

Columbia Gas, Peoples Natural Gas, Philadelphia Gas Works, UGI Utilities, National Fuel, 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 Upon Licensure  
(approximate date).



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.

Applicant, an affiliate, a predecessor of either, or a person identified in this Application has never been convicted of a crime involving fraud or similar activity

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.

Nathan Cartwright, Owner/Director of Sales, 15643 Sherman Way Boulevard, Suite 350, Van Nuys, CA 91406, P: 818-646-3137, F: 818-646-3140

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

Alternate Contact:  
Linsey Allen  
Sales Manager/  
Customer Service  
1563 Sherman Way Blvd  
Ste 350  
Van Nuys, CA 91406  
P: 877-830-3155

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.

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.

Nathan Cartwright



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

July 3, 2014

Nathan Cartwright  
Sales Director  
Trusted Energy LLC  
15643 Sherman Way Ste 350  
Van Nuys, California 91406-4148

RE: Trusted Energy LLC application to serve as a broker/marketer

Dear Mr. Cartwright,

Based on your assertion that Trusted Energy LLC ("TRUSTED ENERGY") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities Inc. ("UGIU") has concluded that TRUSTED ENERGY 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 TRUSTED ENERGY will not be taking title to gas or directly serving end use customers. This also assumes that TRUSTED ENERGY 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 TRUSTED ENERGY 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 a large initial "D".

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



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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July 7, 2014

Mr. Nathan Cartwright  
Sales Director  
Trusted Energy LLC  
\_nathan@trustedenergyllc.com\_

Re: Security Requirement Bond for Trusted Energy LLC

Dear Mr. Cartwright:

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

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

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

Sincerely,

  
Nicholas LaPergola  
Director  
Gas Supply, Transportation & Control

NL:b

**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)

June 13, 2014

Nathan Cartwright  
Sales Director  
Trusted Energy, LLC  
5340 Yarmouth Ave #307  
Encino, CA 91316

Dear Mr. Cartwright:

We are pleased that Trusted Energy, 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”).

Since Trusted Energy, LLC is not currently operating, and has no immediate plan to operate a Pool on the Peoples systems, we have determined at this time that Trusted Energy, 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 Trusted Energy, 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



June 23, 2014

Nathan Dee Cartright  
Director of Sales  
Trusted Energy, LLC  
PO BOX 16174  
Encino, CA 91416

Dear Mr. Cartright:

We are pleased that Trusted Energy, 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, Trusted Energy, 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. Trusted Energy, LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Trusted Energy, 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 Trusted Energy, LLC changes in the future, Columbia Gas might deem it appropriate to require Trusted Energy, 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 of Choice and Nominations



**National Fuel**

July 3, 2014

Nathan Cartwright  
Trusted Energy LLC  
15643 Sherman Way Boulevard, Suite 350  
Van Nuys, CA 91406

Re: Security Requirement for Trusted Energy, LLC:

Dear Nathan,

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

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

July 10, 2014

Nathan Dee Cartwright  
Director of Sales  
Trusted Energy LLC

Re: Bonding Requirements

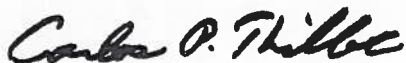
Dear Nathan Dee Cartwright:

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



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