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

IN REPLY PLEASE  
REFER TO OUR FILE

October 14, 2014

Docket No. A-2014-2445228  
Utility Code: 1216966

LISA LEE  
ASSET ENERGY LLC  
150 GRAND ST 4<sup>TH</sup> FL  
WHITE PLAINS NY 10601

**RE: NATURAL GAS SUPPLIER LICENSE**

Dear Ms. Lee:

On September 30, 2014, Asset Energy, LLC's application for approval of a natural gas supplier license as a supplier in the Commonwealth of Pennsylvania was accepted for filing 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  
P.O. Box 3265  
Harrisburg, PA 17105-3265

or  
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, Caroline Cieminski, 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).

*Caroline Cieminski*

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Docket No. A-2014-2445228  
Asset Energy, LLC  
Data Request

1. Reference application, Section 1.a, Identification and Contact Information – Applicant failed to provide the applicant's web address. Please provide an updated application page with the appropriate corrections. Please provide an original document by using the submission method listed above.

Applicant does not have a website.

2. Reference application, Section 1.b, Identification and Contact Information – Applicant failed to provide an address, telephone number or FAX number for the applicant's registered agent. Please provide an updated application page with the appropriate corrections. Please provide an original document by using the submission method listed above.

1150 First Ave, Ste 511, King of Prussia, PA 19406, P: 888-237-3410, F: 888-331-0558

3. Reference application, Section 1.c, Identification and Contact Information – Applicant failed to provide an email address for the regulatory contact. Please provide an updated application page with the appropriate corrections. Please provide an original document by using the submission method listed above.

sdesai@licenselogix.com

4. Reference application, Section 1.e, Identification and Contact Information – Applicant failed to list their primary and alternate contact for complaints and customer service. The application requires the full contact information for a primary and an alternate contact. Please provide an updated sheet to reflect both contacts. Please provide an original document by using the submission method listed above.

Administration, 6923 Oleander Ct, Liberty Twp, OH 45044, P: 513-652-4092, F: 513-755-7846, sbr3id3l@yahoo.com

5. Reference application, Section 4.d, Proposed Service Area – Applicant has not provided bonding letters for Peoples Natural Gas Company (Equitable Gas Division), PECO Energy Company, Philadelphia Gas Works, National Fuel Gas Distribution Corporation, Valley Energy, Peoples Natural Gas Company, LLC, UGI Utilities, Inc., Columbia Gas of Pennsylvania, Inc., UGI-Penn Natural Gas, UGI-Central Penn Gas, and Peoples TWP LLC. Please provide an original document by using the submission method listed above.

Asset Energy LLC respectfully submits that good cause exists to waive the bonding requirement in that Asset Energy proposes only to provide services as a broker. Asset Energy will not be taking title to any natural gas supply; it will not be engaged in direct sales of natural gas to any retail customer; and will not be billing any retail consumer for natural gas supply. Asset Energy proposes instead to provide services to facilitate decisions by purchasers and sellers with respect to their natural gas supply options in the Commonwealth. As such, the risk to Pennsylvania consumers of granting Asset Energy a license is minimal.

6. Reference application, Section 7.d, Financial Fitness – Applicant did not provide details on their broker payment structure. Please provide an explanation to where the applicant plans to obtain financing to be a NGS broker/marketer. Please provide an updated application page with the appropriate corrections. Please provide an original document by using the submission method listed above.

Fees are paid by the supplier in the form of a broker margin. No fees are charged or collected from the customer.

7. Reference application, Section 7.e, Financial Fitness – Applicant failed to provide a Name, Title, Primary address, E-mail address, Telephone number, and a FAX number for their custodian of accounting records. Please provide an updated application page with the appropriate corrections. Please provide an original document by using the submission method listed above.

Name: Caroline Cieminski, Title: President, Address: 6923 Oleander Ct, Liberty Township, OH 45044, P: 513-755-7845, F: 513-755-7846

Primary Contact:  
Caroline Cieminski  
President  
6923 Oleander Ct.  
Liberty Twp, OH 45044  
P: 513-755-7845  
F: 513-755-7846  
ccieminski@rise.net  
Alternate Contact:  
Shawn Breidse

8. Reference application, Section 8, Technical Fitness – Applicant failed to provide documentation for Technical Fitness. Please provide an original document by using the submission method listed above. Applicant can elect to mark submitted information as confidential.

Caroline Cieminski's resume is attached.

9. Reference application, Section 8.b, c, d, Technical Fitness – Applicant failed to list their proposed marketing method, door to door sales or explanation of ethical procedures. Please provide an updated application page with the appropriate corrections. The updated NGS Application package can be found at [http://www.puc.state.pa.us/general/onlineforms/pdf/NGS\\_License\\_App\\_Package.pdf](http://www.puc.state.pa.us/general/onlineforms/pdf/NGS_License_App_Package.pdf) Please provide an original document by using the submission method listed above.

Revised pages are attached.

**CAROLINE A. CIEMINSKI**

6923 Oleander Court  
Liberty Township, OH 45044  
(513) 755-7845 Phone  
(513) 678-8113 Cell  
(513) 755-78465 Fax

[ccieminski@fuse.net](mailto:ccieminski@fuse.net)

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Qualifications for Energy Sales and Marketing

**PERSONAL SUMMARY**

Twenty Five years of experience in sales and marketing, engineering, purchasing and project management. Knowledgeable in bid preparation, marketing development, and energy commodities. Determined achiever with the ability to blend fresh ideas with analytical work requirements to exceed goals. .

**AREAS OF EXPERTISE**

- |                       |                       |                           |
|-----------------------|-----------------------|---------------------------|
| * Sales/Marketing     | * Product Development | * Program Planning        |
| * Commodities Trading | * Client Relations    | * Purchasing/Negotiations |
| * Engineering         | * Cost Control        | * Business Development    |
| * Bid Preparations    | * Strategic Planning  | * Problem Solving         |

**PROFESSIONAL HISTORY**

**Asset Energy LLC**  
*Liberty Township, OH*

**President and Owner, Electric and Natural Gas Sales** 5/2006-Present

Responsible for the day to day business operations and the Electric and Natural Gas sales and supply management for approximately 290 industrial and commercial facilities in Ohio with annual volumes of 20 Bcf and 170,000 MWH's. Emphasis in Ohio is in the Duke Energy of Ohio territory.

**Independent Contractor Pinnacle Energy/BP Canda Energy Marketing** 6/2002-5/2006

Responsible for Natural Gas sales and supply management for approximately 75 industrial and commercial facilities in Ohio, Indiana and Kentucky representing gross margins of \$2.5 million annually and daily volumes of approximately 75,000 MMBtu's.

**Sigcorp Energy Services LLC**  
*Liberty Township, OH*

**Senior Sales Representative** 5/98-6/2002

Responsible for Natural Gas sales and supply management for approximately 161 industrial and commercial facilities in Ohio, Indiana and Kentucky representing gross margins of more than \$3 million annually and daily volumes in excess of 100,000 MMBtu's.

**Schrock Cabinet Company (A division of AB Electrolux)**  
*Richmond, IN*

**Facilities Manager and Environmental Coordinator, Operations** 1/97-5/98

Responsible for total facilities management; identification of energy projects and energy purchases; process evaluation and improvements; coordinating environmental and safety activities; managing major building projects; new and used equipment purchases and sales; management of capital budget and preparation of corporate approval documentation.

**AK STEEL**  
*Middletown, OH*

**Energy and Raw Materials Buyer, Raw Materials and Transportation** 9/95-1/97

Responsible for evaluating, bidding, contract negotiations and purchasing over \$250 million annually in commodities including, natural gas, electricity, fuels and other raw materials; preparation of corporate approval documentation; and identification and implementation of commodity related capital improvement projects for new and existing facilities.

- \* Implemented a written Competitive Leverage Strategy for purchasing power.
- \* Reduced natural gas expenses by \$15 million by utilizing forward buying and other *options*.
- \* Proposed a natural gas bypass project to reduce expenses by \$6.5 million annually.
- \* Negotiated \$90 million lime products agreement that will guarantee quality and supply.

**NORTHERN STATES POWER COMPANY**

*St. Paul, MN*

**Sr. Product Manager, Gas Marketing and Sales** 10/94-8/95

Responsible for developing products; establishing and maintaining relationships with customers; developing business plans; providing market evaluations; pricing products; preparing proposals and bid analysis; evaluating and implementing new technologies such as fuel cells and co-generation to increase margins; providing technical support; and arranging all marketing and sales promotions.

- \* Developed a Distribution Management Service that will increase revenues by \$9 million.
- \* Created a program to establish and maintain relationships with major engineering firms.

**Project Superintendent, Gas Supply and Engineering** 3/94-9/94

Responsible for providing economic analysis and phase review; developing and maintaining labor contracts; preparing and managing budgets; cost estimates of materials; procuring materials and supplies; supervising and scheduling steel and plastic main construction; hiring and training personnel; providing customer service; and developing and implementing quality control processes.

- \* Member of team responsible for a \$23 million expansion project.
- \* Saved over \$400,000 in steel pipe design and procurement and \$1 million in pipe sizing.
- \* Wrote an article for *Pipeline and Gas Journal* magazine.

**Design Team Leader, Gas Supply and Engineering** 11/92-2/94

Responsible for coordinating activities for reconstruction projects for a self directed work group comprised of Engineers, Planners and Designers.

- \* Systematized a measure for quality and employee satisfaction under direction of CEO.
- \* Increased efficiency by 20% by implementing written process improvements.

**Engineer and Contractor Supervisor, Gas Operations** 4/88-10/92

Responsible for hiring, training and supervising contractor personnel; coordinating project designs and operating procedures; establishing and maintaining relations with customers; coordinating response on gas main hits; and writing DOT responses and participating in the Gas Standards Committee.

- \* Created a process for checking all aspects of a gas pipeline project.
- \* Reduced expenses by 15% by developing a process for reviewing invoices.

**EDUCATION**

**Bachelor of Science in Mechanical Engineering with Industrial Emphasis** 9/85-3/90  
University of Minnesota, Institute of Technology (GPA: 3.0/4.0)

- e. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.
- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application.

*All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.*

*Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.*

## **8. TECHNICAL FITNESS:**

To ensure that the present quality and availability of service provided by natural gas distribution companies does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

- a. **EXPERIENCE, PLAN, STRUCTURE:** such information may include:
- Applicant's previous experience in the natural gas industry.
  - Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
  - Type of customers and number of customers Applicant currently serves in other jurisdictions.
  - Staffing structure and numbers as well as employee training commitments.
  - Business plans for operations within the Commonwealth.
  - Any other information appropriate to ensure the technical capabilities of the Applicant.
- b. **PROPOSED MARKETING METHOD** (check all that apply)
- Internal – Applicant will use its own internal resources/employees for marketing
  - External NGS – Applicant will contract with a **PUC LICENSED NGS**
  - Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
  - External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or nonselling marketer**
  - Other (Describe):

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

- Yes  
 No

If yes, will the Applicant be using verification procedures?

- Yes  
 No

If yes, describe the Applicant's verification procedures.

d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

Asset Energy participates in an Ethics class.

e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations.

## 9. DISCLOSURE STATEMENT:

**DISCLOSURE STATEMENTS:** If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas 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.

***Not applicable for an applicant applying for a license exclusively as a broker/marketer.***

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White Plains, NY 10601



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