

March 2, 2017

Via E-filing

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
400 North Street
2nd Floor, Room N-201
Harrisburg, PA 17120

**RE: Docket No. A-2016-2549989 (Application Update for Natural Gas Supplier
License Application of nTherm, LLC)**

Dear Sir or Madam:

This firm represents nTherm, LLC. On June 9, 2016, nTherm, LLC e-filed its application for a natural gas supplier license via e-filing, Docket No. A-2016-2549989. nTherm, LLC desires to amend its application in order to indicate that it will be doing door-to-door sales. Accordingly, nTherm, LLC hereby submits a revised Section 8 of the application (but the attachments referenced in Section 8 have not changed and are therefore not attached). In addition, enclosed please find a verification of nTherm's responses per 52 Pa Code §1.36.

Please contact me at (303) 376-4467 or email me at Aseneshen@wsmtlaw.com with any questions. Thank you very much for your assistance in this matter.

Very truly yours,



Amy E. Seneshen

encl.

VERIFICATION PER 52 PA CODE §1.36

I, Rhett Shumway, 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).

NTHERM, LLC

By: *Rhett Shumway*
Rhett Shumway, CEO

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.

See Attachment 8(a).

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 non-selling 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.

The Applicant will be using Trutested as its Third Party Verification (TPV).

- 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.

All of our personal have specific retail natural gas marketing backgrounds going back at least 10 years but most of our experience is greater than 20 years. We are very familiar with operating in Choice territories and selling to residential and light commercial customers. We have the background and experience necessary to work with call centers to develop phone scripts and marketing material which will abide by the rules set forth by the Commission and Staff, maintain the integrity of the process and foster an environment of price transparency to the customer and all with more options than customers have had before.

	Action	Disposition
1	Complaint received via phone or email and logged into CRM	The phone will be set to simul-ring so that someone will always answer the phone during normal business hours and will log the complaint. If the complaint is made via email, the complaint will be logged and distributed to the group.
2	Complaint will be assigned in the CRM	The CRM will assign a member of our group the complaint and will create a ticket to track the progress of resolving the problem to the customers satisfaction.
3	Consumer is satisfied	CRM will be updated to reflect resolution and ticket will be closed out
4	Customer not satisfied	Notes will be made in the CRM to reflect any follow up steps or dates for action items. Customer will be informed they have the right to register a formal complaint to the commission and will be given the appropriate contact information.
5	Customer files a complaint	The complaint will be logged in the CRM, a response will be sent to the Commission staff within the timeline specified by the Commission or within a commercially reasonable amount of time, whichever comes first and any supporting documentation, or TPV recordings will be provided.

Telemarketing

- NTherm will design and review phone scripts for sales calls
- Phone representatives will be supplied with necessary materials and information
- Solicitations will comply with Do-Not-Call, Federal, State and Utility rules and regulations governing the sale of natural gas
- Calls will be recorded for quality assurance and we will utilize TPV in order to validate the customers firm intent to enroll with NTherm under the rate option of their choice at the price agreed upon.
- NTherm will provide copies of Sales agreements to customers in reasonable and timely fashion
- Phone recordings will be reviewed from time to time in order to insure quality control.

Online Sales Material

- The website for NTherm will follow all requirements of the Uniform Electronic Transaction Act.
- The website will be used to help enroll customers, send out confirmations and provide general information about NTherm so customers can make informed decisions.

- e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience.

See **Attachment 8(e)**.