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12 April 2017

APR 14 2017

Secretary's Bureau
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: REQUEST FOR CONFIDENTIALITY
American Power & Gas of Pennsylvania, LLC
License Docket Number: A-2013-2355561

To Whom It May Concern;

American Power & Gas of Pennsylvania, LLC respectfully requests that the information in Exhibit A of the attached Petition for extension on changing security language be treated by the Commission as trade secret information and confidential commercial information. The information in these documents, if made publicly available, would likely cause substantial injury to the competitive positions of American Power & Gas. Accordingly, we respectfully request that the attached unredacted document be treated as confidential trade secret information and afforded all of the protections against public disclosure available for such information, as provided by law.

Thank you. Please let me know if you have any questions or need anything else.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Barry".

Lisa Barry
Regulatory Officer

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12 April 2017

APR 14 2017

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: American Power & Gas of Pennsylvania, LLC
Docket No. A-2013-2355561

PETITION FOR EXTENSION ON CHANGING SECURITY LANGUAGE

Before the Pennsylvania Public Utility Commission (the "Commission"), American Power & Gas of Pennsylvania ("AP&G"), LLC hereby files this Petition for extension on changing security language of our Irrevocable Standby Letter of Credit ("LOC"). In support of this petition for Security Level Reduction, AP&G states the following:

1. AP&G standardly complies with the PUC reporting and security requirements.
2. On March 13, 2017 AP&G was informed of the change of letter of credit wording in the new EGS application.
3. On March 14th, 2017 we reached out to our banking institution to have the language changed. In regard to the paragraph:

WE ARE ADVISED THAT: 1. PAYMENTS MADE PURSUANT TO THIS LETTER OF CREDIT SHALL BE APPLIED FIRST TO THE BENEFIT OF THE COMMONWEALTH, AND SECOND, TO ANY AND ALL RETAIL ELECTRIC GENERATION CUSTOMERS TO WHOM PRINCIPAL MAY BE HELD LEGALLY LIABLE FOR FAILURE TO SUPPLY ELECTRIC GENERATION PURSUANT TO CONTRACT, AGREEMENTS OR ARRANGEMENTS; 2. ANY CLAIMS MADE BY THE COMMONWEALTH SHALL HAVE PRIORITY OVER CLAIMS MADE BY PRIVATE INDIVIDUALS; AND 3. PROCEEDS OF THE LETTER OF CREDIT MAY NOT BE USED TO PAY PENALTIES OR FINES LEVIED AGAINST PRINCIPAL FOR VIOLATIONS OF THE LAW, OR FOR PAYMENT OF ANY OTHER OBLIGATIONS OWED TO THE COMMONWEALTH.

The bank's legal department has advised us that "Even as an informational statement we have a problem including it in our LC since the drawing statement only indicates

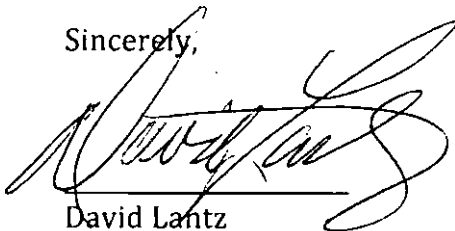
the amount claimed is owed the PUC and only the PUC could draw under our LC and we'd pay only the PUC. What they do with the proceeds of a drawing after they receive them is up to them and wouldn't be known or controlled by us."

4. APG will need time to research and arrange a new LOC.
5. Our current LOC is in place until February 05, 2018 (it automatically extends each year and requires a 30-day notice from the bank to cancel).
6. At Exhibit A is a copy of our existing LOC.
7. The main CD backing the LOC matures on October 29, 2017. There is a penalty to change this prior to the maturity date.

For these reasons, AP&G respectfully submits that the Commission grant an extension until November 15, 2017 to allow the necessary time to change our bank, relocate our CD and have a new LOC created with the new required language.

Thank you in advance for your consideration.

Sincerely,



David Lantz
Chief Financial Officer
American Power & Gas, LLC
10601 Belcher Road South
Seminole, FL 33777
T: 727-479-0598
F: 727-733-6618
E: DavidL@GoAPG.com

FedEx
TRK# 8111 6946 1497
0215

MON - 17 APR 2017
STANDARD OVERNIGHT
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MDT

XH MDTA



FTD 5167185 14APR17 PTEA 546C2/CFD6/0CBA

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RT 205
FZ 229
6 15:00
B 1497
04.17

FedEx Express Package US Airbill

FedEx Tracking Number 8111 6946 1497

Form ID No. 0215

Recipient's Copy

1 From
Date 4/14/2017
Sender's Name LISA BARRY Phone 727 733-8700
Company AMERICAN POWER AND GAS LLC
Address 10601 BELCHER RD S
City SEMINOLE State FL ZIP 33777-1407

2 Your Internal Billing Reference

3 To
Recipient's Name SECRETARY Phone 717 712 7117
Company PA PUC
Address 400 NORTH STREET
City HARRISBURG State PA ZIP 17120

Hold Weekday
FedEx location address
REQUIRED. NOT available for
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Hold Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

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4 Express Package Service *To most locations. Packages up to 150 lbs. For packages over 100 lbs., use the FedEx Express Freight US Airbill.

Next Business Day
 FedEx First Overnight
 FedEx Priority Overnight
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2 or 3 Business Days
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 FedEx 2Day
 FedEx Express Saver

5 Packaging *Declared value limit \$500.
 FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

Saturday Delivery
 No Signature Required
 Direct Signature
 Indirect Signature

Does this shipment contain dangerous goods?
 No Yes
 Dry Ice Cargo Aircraft Only

7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender Acct. No. in Section 1 (add for bill)
 Recipient Third Party Credit Card Cash/Check

Total Packages Total Weight
Credit Card Auth.

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