

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Key Energy Consulting LLC, d/b/a Not Applicable, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) Broker/Marketer engaged in the business of supplying electricity services to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

- a. **IDENTITY OF THE APPLICANT:** Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:

Key Energy Consulting, LLC
Attn: Anthony K. Gallagher
950 Union Meeting Road, Blue Bell, PA 19422
www.keyenergyconsulting.com
215-970-6878

- b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

Applicant maintains a primary address in Pennsylvania:
950 Union Meeting Road, Blue Bell, PA 19422

- c. **REGULATORY CONTACT:** Provide the name, title, address, telephone number, fax number, and e-mail address of the person to whom questions about this Application should be addressed.

Anthony K. Gallagher
Managing Member
950 Union Meeting Road, Blue Bell, PA
Phone: 215-970-6878
Fax: 215-717-4635
email: agallagher@keyenergyconsulting.com

- d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

Paul Galante - Attorney
Elliott & Greenleaf Law Offices
39 Public Square, Wilkes Barre, PA 18701
Phone: 570-371-5290
Fax: 570-969-2890
e-mail: pag@elliottgreenleaf.com

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS: (Required of ALL Applicants)** Provide the name, title, address, telephone number, FAX number, and e-mail **OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED)** responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Electric Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed EGSSs.

Main Contact: Anthony K. Gallagher
Managing Member
950 Union Meeting Road, Blue Bell, PA 19422
Phone: 215-970-6878
Fax: 215-717-4635
e-mail: agallagher@keyenergyconsulting.com

Alternate Contact: Paul Galante
Attorney
39 Public Square, Wilkes Barre, PA 18701
Phone 570-371-5290
Fax: 570-969-2890
e-mail: pag@elliottgreenleaf.com

2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as ("d/b/a")

Provide a copy of the Applicant's filing with Pennsylvania's Department of State pursuant to 54 Pa. C.S. §311, Form PA-953.

or

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**

(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)

The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.

or

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- * If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

or

The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.

Please see Attachment A

- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.

Business is incorporated/organized/formed in Pennsylvania. Please see Attachment A

- Give name and address of officers.

Anthony K. Gallagher

Managing Member

950 Union Meeting Road, Blue Bell, PA 19422

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

a. AFFILIATES: Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

Applicant does not have any affiliates doing business.

b. PREDECESSORS: Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

Key Energy Consulting, LLC does not have any predecessors. Key Energy Consulting, LLC was established on October 18, 2011 by Gerald J. McConeghy. Effective, January 1, 2015 100% of the membership shares of Key Energy Consulting LLC were transferred from Gerald J. McConeghy to Anthony Gallagher. Please see the supporting documentation in Attachment A.

4. OPERATIONS

a. **APPLICANT'S PRESENT OPERATIONS:** *(select and complete the appropriate statement)*

Definitions

- Supplier – an entity that sells electricity to end-use customers utilizing the jurisdictional transmission and distribution facilities of an EDC.
- Aggregator - an entity that purchases electric energy and takes title to electric energy as an intermediary for sale to retail customers.
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of electric energy but does not take title to electric energy.

The Applicant is presently doing business in Pennsylvania as a

- municipal electric corporation
- electric cooperative
- local gas distribution company
- provider of electric generation, transmission or distribution services
- broker/marketer engaged in the business of supplying electricity services
- Other; Identify the nature of service being rendered.

Applicant is doing business as an Energy Consultant helping commercial customers, Government and Non-Profit entities audit bills, track efficiency, cost and consumption.

OR

The Applicant is not presently doing business in Pennsylvania.

b. **APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a *(may check multiple):*

- Generator of electricity
- Supplier of electricity
- Aggregator engaged in the business of supplying electricity
- Broker/Marketer engaged in the business of supplying electricity services
 - Check here to verify that your organization will not be taking title to the electricity nor will you be making payments for customers.
- Electric Cooperative and supplier of electric power
- Other (Describe):

- c. **PROPOSED SERVICES:** Describe in detail the electric services or the electric generation services which the Applicant proposes to offer.

Applicant proposes to act as an Electric Broker/Marketer - an entity that acts as an intermediary in the sale/purchase of electric energy, but does not take title to electric energy.

- d. **PROPOSED SERVICE AREA:** Check the box of each Electric Distribution Company for which the Applicant proposes to provide service.

- | | |
|---|--|
| <input type="checkbox"/> Citizens' Electric | <input type="checkbox"/> Pike |
| <input type="checkbox"/> Duquesne Light | <input checked="" type="checkbox"/> PPL |
| <input checked="" type="checkbox"/> Met-Ed | <input checked="" type="checkbox"/> UGI Utilities |
| <input checked="" type="checkbox"/> PECO | <input type="checkbox"/> Wellsboro |
| <input type="checkbox"/> Penelec | <input type="checkbox"/> West Penn |
| <input type="checkbox"/> Penn Power | |
| | <input type="checkbox"/> Entire Commonwealth of PA |

- e. **CUSTOMERS:** Applicant proposes to provide services to:

- | | |
|-------------------------------------|--|
| <input type="checkbox"/> | Residential Customers |
| <input type="checkbox"/> | Small Commercial Customers - (25 kW and Under) |
| <input type="checkbox"/> | Residential and Small Commercial as Mixed Meter <u>ONLY</u> (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE) |
| <input checked="" type="checkbox"/> | Large Commercial Customers - (Over 25 kW) |
| <input checked="" type="checkbox"/> | Industrial Customers |
| <input checked="" type="checkbox"/> | Governmental Customers |
| <input type="checkbox"/> | All of above (Except Mixed Meter) |
| <input type="checkbox"/> | Other (Describe): |

- f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

Upon Commission Approval

5. COMPLIANCE

- a. **CRIMINAL/CIVIL PROCEEDINGS:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such.

Applicant is not a defendant in any criminal or civil proceeding in the last 5 years.

- b. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any such proceedings listed above.

Not Applicable

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. If the Applicant has no actions or complaints to list, explicitly state such.

The Applicant has no actions or complaints to list.

- d. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above.

Not Applicable

6. PROOF OF SERVICE

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.
(Example Certificate of Service is attached at Appendix C)

- a. **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Office of the Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

- b. **EDCs:** Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Electric Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each EDC is as follows.

Pike County Light & Power Company:
Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

West Penn:
Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

PECO:
Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Duquesne Light:
Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

PPL:
Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

Met-Ed, Penelec, and Penn Power:

Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

UGI:

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, Pa 19612-2677

Citizens' Electric Company:

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Wellsboro Electric Company:

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

7. FINANCIAL FITNESS

a. **BONDING:** In accordance with 66 Pa. C.S. Section 2809(c)(1)(i), the Applicant is required to file a bond or other instrument to ensure its financial responsibilities and obligations as an EGS. Therefore, the Applicant is...

- Furnishing the **ORIGINAL** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$250,000.
- Furnishing the **ORIGINAL** of another initial security for Commission approval, to ensure financial responsibility, such as a parental guarantee, in the amount of \$250,000.
- For Marketers and Brokers** - Filing for a modification to the \$250,000 requirement and furnishing the **ORIGINAL** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$10,000. Applicant is required to provide information supporting an amount less than \$250,000. Such supporting information must include indication that the Applicant will not take title to electricity and will not pay electricity bills on behalf of its customers. Further details for modification may be described as well.

CRITICAL BONDING NOTES:

Applicant is required to maintain a bond or other financial instrument the entire time it maintains an EGS license with the Commonwealth of Pennsylvania. If Applicant's security instrument is not continuous, Applicant **MUST** submit a Rider, Amendment, or Continuation Certificate annually based on the expiration date of its security instrument.

Sixty days (60) prior to the security instrument's expiration date, Applicant should contact Stephen Jakab at sjakab@pa.gov to determine the appropriate bonding amount based on a percentage of Applicant's gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. Once the amount has been determined, Applicant should overnight the updated security instrument(s) at least thirty (30) days prior to the expiration date to ensure adequate time for staff review and approval of the security instrument(s).

Example version of a bond, letter of credit, and parental guarantee are attached at Appendix D, E, & F, respectively. Applicant's security must follow language from these examples. Any deviation from these examples must be identified in the application and may not be acceptable to the Commission.

b. FINANCIAL RECORDS, STATEMENTS, AND RATINGS: Applicant must 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. Key Energy Consulting LLC is a privately held company with no parent or subsidiary companies.
- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)
Key Energy Consulting, LLC is a privately held company that does not file 10Q or 10K reports.
- Applicant's accounting statements, including balance sheet and income statements for the past two years.
Please see Attachment B
- 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, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports.
Key Energy Consulting, LLC is a privately held company that does not subscribe to Dun and Bradstreet.
- 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.
Please see Bond information in Appendix D .
- Audited financial statements exhibiting accounts over a minimum two year period.
Key Energy Consulting, LLC is a privately held company our financial statements are not publicly audited
- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.
Please see Attachment B

c. SUPPLIER FUNDING METHOD: If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.

Applicant is operating as a Broker/Marketer

d. BROKER PAYMENT STRUCTURE: If applicant is a broker/marketer, explain how your organization will be collecting your fees.

As a broker/marketer Key Energy Consulting will be collecting fees from the supply companies. Our fee will be mil based (\$0.001)/KWH. Our fee will be paid on a residual monthly basis. We will collect our fees after the Customer pays their utility bill and the utility pays the supplier. We want to make certain the Customer is satisfied with the charges on their utility bill. We will be the last ones paid. We will not take any "up-front" payments.

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.

Dawn McDuell
Certified Public Accountant
7804 Montgomery Ave, Elkins Park, PA 19027
Phone: 215-635-6300
Fax: 215
email: dmcduell@comcast.net

f. TAXATION: Complete the TAX CERTIFICATION STATEMENT attached as Appendix G to this application.

All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identification 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 electric utilities 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 electricity industry.
Please see Attachment C
- Summary and proof of licenses as a supplier of electric services in other states or jurisdictions.
Not Applicable
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
Key Energy Consulting works with one commercial customer in New York, two in New Jersey and one in Maryland.
Staffing structure and numbers as well as employee training commitments.
Please see Attachment C
- Business plans for operations within the Commonwealth.
Please see Attachment C
- Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.
Please see Attachment C
- Any other information appropriate to ensure the technical capabilities of the Applicant.
Please see Attachment C

b. **PROPOSED MARKETING METHOD** (*check all that apply*)

- Internal – Applicant will use its own internal resources/employees for marketing
- External EGS – Applicant will contract with a PUC **LICENSED EGS** broker/marketer
- Affiliate – Applicant will use a **NON-EGS** affiliate marketing company and or individuals.
- External Third-Party – Applicant will contract with a **NON-EGS** third party marketing company and or individuals
- 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.

Applicant will not use subcontractors for marketing.

The marketing will be performed internally to the existing contacts we have in our own in-house database. This database has been built internally from previous experiences in working with commercial accounts in Pennsylvania. We have over two decades of sales experience in Pennsylvania in regulated industries; Telecommunications and Energy. Through this experience we have dealt with thousands of businesses in Pennsylvania. Most of our marketing will be to our existing contacts.

- 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.

Anthony K. Gallagher
Managing Member

Please see Attachment C

- f. **FERC FILING:** Applicant has:

- Filed an Application with the Federal Energy Regulatory Commission to be a Power Marketer.
- Received approval from FERC to be a Power Marketer at Docket or Case Number _____.
- Not applicable

9. DISCLOSURE STATEMENTS:

Disclosure Statements: If proposing to serve Residential and/or Small Commercial (under 25 kW) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix H to this Application.

- Electricity 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.

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **PJM LOAD SERVING ENTITY REQUIREMENT:** As a prospective EGS, the applicant understands that those EGSs which provide retail electric supply service (i.e. takes title to electricity) must provide either:
- proof of registration as a PJM Load Serving Entity (LSE), or
 - proof of a contractual arrangement with a registered PJM LSE that facilitates the retail electricity services of the EGS.

The Applicant understands that compliance with this requirement must be filed within 120 days of the Applicant receiving a license. As well, the Applicant understands that compliance with this requirement may be filed with this instant application.

(Select only one of the following)

- AGREED - Applicant has included compliance with this requirement in the instant application, labeled in correspondence with this section (10).
- AGREED - Applicant will provide compliance with this requirement within 120 days of receiving its license
- ACKNOWLEDGED - Applicant is not proposing to provide retail electric supply service at this time, and therefore is not presently obligated to provide such information

b. STANDARDS OF CONDUCT AND DISCLOSURE: As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 54.43, as well as any future amendments.

AGREED

c. REPORTING REQUIREMENTS: Applicant agrees to provide the following information to the Commission or the Department of Revenue, as appropriate:

- Retail Electricity Choice Activity Reports: The regulations at 52 Pa. Code §§ 54.201–54.204 require that all active EGSs report sales activity information. An EGS will file an annual report reporting for customer groups defined by annual usage. Reports must be filed using the appropriate report form that may be obtained from the PUC's Secretary's Bureau or the forms officer, or may be down-loaded from the PUC's internet web site.
- Reports of Gross Receipts: Applicant shall report its Pennsylvania intrastate gross receipts to the Commission on a quarterly and year to date basis no later than 30 days following the end of the quarter.
- The Treasurer or other appropriate officer of Applicant shall transmit to the Department of Revenue by March 15, an annual report, and under oath or affirmation, of the amount of gross receipts received by Applicant during the prior calendar year.
- Net Metering Reports: Applicant shall be responsible to report any Net Metering per the Standards on http://www.puc.pa.gov/consumer_info/electricity/alternative_energy.aspx. Scroll down to the Net Metering Standards Section.
- Applicant shall report to the Commission the percentages of total electricity supplied by each fuel source on an annual basis per 52 Pa. Code § 54.39(d).
- Applicant will be required to meet periodic reporting requirements as may be issued by the Commission to fulfill the Commission's duty under Chapter 28 pertaining to reliability and to inform the Governor and Legislature of the progress of the transition to a fully competitive electric market.

AGREED

- d. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. Section 2809(D). Transferee will be required to file the appropriate licensing application.

AGREED

- e. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling electricity in the Commonwealth of PA, and an annual supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.

ACKNOWLEDGED

- f. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 54.34.

AGREED

- g. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.

AGREED

- h. **NOTIFICATION OF CHANGE:** If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within twenty (20) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 54.34.

AGREED

- i. **CEASING OF OPERATIONS:** Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.

AGREED

- j. **Electronic Data Interchange:** The Applicant acknowledges the Electronic Data Interchange (EDI) requirements and the relevant contacts for each EDC, as listed at Appendix K.

AGREED

- k. **FILING FEE:** The Applicant has enclosed or paid the required, non-refundable filing fee by **CERTIFIED CHECK OR MONEY ORDER** in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. The Commission does not accept corporate or personal checks for filing fees.

PAYMENT ENCLOSED

11. AFFIDAVITS

Must be notarized before filing.

- a. **APPLICATION AFFIDAVIT:** Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.

- b. **OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the reliability protocols of the North American Electric Reliability Council, the appropriate regional reliability council(s), and the Commission, and that you agree to comply with the operational requirements of the control area(s) within which you provide retail service. An example copy of this Affidavit can be found at Appendix B.

12. NEWSPAPER PUBLICATIONS

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.

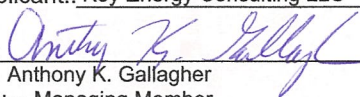
The chart below dictates which newspapers are necessary for each EDC. For example, an applicant that wants to operate in Penn Power would need to run ads in both The Erie Times-News and the Pittsburgh Post-Gazette. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and must be supplied with this application. Applicants do not need a docket number in their publication. Docket numbers will be issued when all criteria on the item 14 checklist (see below) are satisfied.

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Citizens' Electric						X	
Duquesne				X			
Met Ed		X	X		X		
PECO			X				
Penelec	X	X			X	X	X
Penn Power	X			X			
Pike					X		
PPL		X	X		X	X	
UGI					X		
Wellsboro						X	
West Penn		X		X		X	X
Entire Commonwealth	X	X	X	X	X	X	X

(Example Publications are provided at Appendices I and J)

13. SIGNATURE

Applicant: Key Energy Consulting LLC
 By: 
 Anthony K. Gallagher
 Title: Managing Member

14. CHECKLIST

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections are complete.

Applicant: Key Energy Consulting, LLC

	Signature	
✓	Filing Fee (CERTIFIED CHECK OR MONEY ORDER ONLY)	
✓	Application Affidavit	
✓	Operations Affidavit	
✓	Proof of Publication	
✓	Bond or Letter of Credit	
✓	Tax Certification Statement	
✓	Commonwealth Department of State Verification	
✓	Certificate of Service	

Applicant's Use

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Pennsylvania :

: ss.

County of Luzerne :

ANTHONY K. GALLAGHER Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the MANAGING MEMBER (Office of Affiant) of Key Energy Consulting (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein Key Energy Consulting has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as an electric generation supplier pursuant to 66 Pa. C.S. § 2809 (B).

That the Applicant herein Key Energy Consulting has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein Key Energy Consulting acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein Key Energy Consulting acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

Anthony K. Gallagher
Signature of Affiant

Sworn and subscribed before me this 4th day of May, 20 17.

Mary Grace Kabacinski
Signature of official administering oath

My commission expires 6-27-19.

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Mary Grace Kabacinski, Notary Public
City of Scranton, Lackawanna County
My Commission Expires June 27, 2019
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Pennsylvania :

ss.

County of Luzerne :

Anthony K. Gallagher, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the MANAGING MEMBER (Office of Affiant) of Key Energy Consulting (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Key Energy Consulting, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That Key Energy Consulting, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render electric service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That Key Energy Consulting, the Applicant herein, certifies to the Commission that it is subject to , will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 28 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28, shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional Gross Receipts and power sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

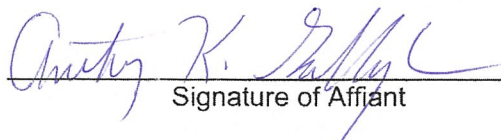
As provided by 66 Pa. C.S. §2810 (C)(6)(iv), Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That Key Energy Consulting, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506, §2807 (C), §2807(D)(2), §2809(B) and the standards and billing practices of 52 PA. Code Chapter 56.

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Bureau of Public Liaison or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.


Signature of Affiant

Sworn and subscribed before me this 4TH day of MAY, 2017.


Signature of official administering oath

My commission expires 6/27/19.

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Mary Grace Kabacinski, Notary Public
City of Scranton, Lackawanna County
My Commission Expires June 27, 2019
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Appendix C

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

CERTIFICATE OF SERVICE

On this the 22 day of May 2017, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as an Electric Generation Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

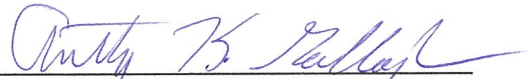
Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, Pa 19612-2677



Anthony K. Gallagher, Managing Member
Key Energy Consulting, LLC

Appendix D: Bond

The original bond is being filed separately. It is excluded from this PDF file.

Appendix I: Notices of Publication

PROOF OF PUBLICATION OF NOTICE IN THE WILLIAMSPORT SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF LYCOMING

SS:

Bernard A. Oravec Publisher of the Sun-Gazette Company, publishers of the Williamsport, Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport Sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

April 26, 2017

Affiant further deposes that he is an officer daily authorized by the Sun-Gazette Company, publisher of the Williamsport Sun-Gazette to verify the foregoing statement under oath and also declares that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all the allegations in the foregoing statement as to time, place and character of publication are true.

Bernard A. Oravec

SUN-GAZETTE COMPANY

Sworn to and subscribed before me
the 26th day of April

2017

Christina Dewald

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
CHRISTINA DEWALD
Notary Public
CITY OF WILLIAMSPORT, LYCOMING COUNTY
My Commission Expires Apr 18, 2020

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette Company, Dr.:
For publishing the notice attached
hereto on the above state dates.....\$ 223.40
Probated same.....\$
Total.....\$ 223.40

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE SUN-GAZETTE COMPANY hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

SUN-GAZETTE COMPANY

BY Bernard A. Oravec

Pennsylvania
Public Utility Commission
Notice

Application of Key Energy Consulting, LLC For Approval To Offer, Render, Furnish Or Supply Electricity of Electric Generation Services As A Marketer/Broker Engaged In The Business Of Supplying Electricity To The Public In The Commonwealth Of Pennsylvania.

Key Energy Consulting, LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as a broker/marketer engaged in the business of supplying electricity. Key Energy Consulting, LLC proposes to sell electricity and related services in PECCO, PPL, UGI and WetEd under the provisions of the new Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Key Energy Consulting, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Key Energy Consulting's attorney at the address listed below.

By and through Counsel:
Paul A. Galante
Elliott & Greenleaf
39 Public Square, # 1000
Wilkes Barre, PA 18701
570-371-5290
570-969-2890

Proof of Publication in The Philadelphia Daily News
Under Act. No 587, Approved May 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Helene Sweeney being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said newspaper on the following dates:

April 26, 2017

Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

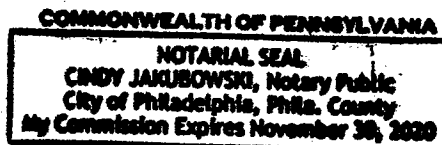


Sworn to and subscribed before me this 26th day of
April 2017.



Notary Public

My Commission Expires:



Copy of Notice of Publication

Pennsylvania
Public Utility Commission
Notice
Application of Key Energy Consulting, LLC For
Approval To Offer, Render, Furnish Or Supply
Electricity of Electric Generation Services As A
Marketer/Broker Engaged In The Business Of
Supplying Electricity To The Public In The Com-
monwealth Of Pennsylvania.
Key Energy Consulting, LLC will be filing an ap-
plication with the Pennsylvania Public Utility
Commission ("PUC") for a license to supply
electricity or electric generation services as a
broker/marketer engaged in the business of
supplying electricity. Key Energy Consulting,
LLC proposes to sell electricity and related
services in PECO, PPL, UGI and MetEd under
the provisions of the new Electricity Generation
Customer Choice and Competition Act.
The PUC may consider this application without
a hearing. Protests directed to the technical or
financial fitness of Key Energy Consulting, LLC
may be filed within 15 days of the date of this
notice with the Secretary of the PUC 400 North
Street, Harrisburg, PA 17120. You should send
copies of any protest to Key Energy Consul-
ting's attorney at the address listed below.
By and through Counsel: Paul A. Galante
Elliott & Greenleaf
39 Public Square, # 1000
Wilkes Barre, PA 18701
570-371-5290
570-969-2890



Commonwealth of Pennsylvania,) ss
County of Cumberland)

Dwayne Connor being duly sworn, deposes that he/she is principal clerk of PA Media Group; that The Patriot News is a public newspaper published in the city of Mechanicsburg, with general circulation in Cumberland and Dauphin and surrounding counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Patriot News 04/25/2017

Principal Clerk of the Publisher

Sworn to and subscribed before me this 26th day of April 2017

Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Donna M. Maldonado, Notary Public
Susquehanna Twp., Dauphin County
My Commission Expires Nov. 5, 2017

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Pennsylvania
Public Utility Commission
Notice

Application of Key Energy Consulting, LLC For Approval To Offer, Render, Furnish Or Supply Electricity of Electric Generation Services As A Marketer/Broker Engaged In the Business Of Supplying Electricity To The Public In The Commonwealth Of Pennsylvania.

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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Key Energy Consulting, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Key Energy Consulting's attorney at the address listed below.

By and through Counsel:

Paul A. Galante
Elliott & Greenleaf
39 Public Square, # 1000
Wilkes Barre, PA 18701
570-371-5290
570-969-2890

The Scranton Times (Under act P.L. 877 No 160. July 9,1976)
Commonwealth of Pennsylvania, County of Lackawanna

KEY ENERGY CONSULTING
TONY GALLAGHER
950 UNION MEETING ROAD BLUE BELL PA 19422

Account # 622833
Order # 82070448
Ad Price: 242.05

LEGAL NOTICE PENNSYLVANI

Gina Krushinski
Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

04/25/2017

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true *Gina Krushinski*

Sworn and subscribed to before me
this 25th day of April A.D., 2017

Sharon Venturi

(Notary Public)

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Sharon Venturi, Notary Public
City of Scranton, Lackawanna County
My Commission Expires Feb. 12, 2018
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

LEGAL NOTICE

Pennsylvania Public Utility
Commission Notice

Application of Key Energy Consulting, LLC For Approval To Offer, Render, Furnish Or Supply Electricity of Electric Generation Services As A Marketer/Broker Engaged In the Business Of Supplying Electricity To The Public In The Commonwealth Of Pennsylvania.

Key Energy Consulting, LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as a broker/marketer engaged in the business of supplying electricity. Key Energy Consulting, LLC proposes to sell electricity and related services in PECO, PPL, UGI and MetEd under the provisions of the new Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Key Energy Consulting, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Key Energy Consulting's attorney at the address listed below.

By and through Counsel:
Paul A. Galante
Elliott & Greenleaf
39 Public Square, # 1000
Wilkes Barre, PA 18701
570-371-5290
570-969-2890

Attachment A – As referenced in:

Section 2. **BUSINESS ENTITY FILINGS AND REGISTRATIONS**

Part b. **BUSINESS ENTITY AND DEPARTEMENT OF STATE FILINGS**

**PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU**

**Certificate of Organization
Domestic Limited Liability Company
(15 Pa.C.S. § 8913)**

Name	Esquire Assist		
Address	Counter - Pick up		
City	State	Zip Code	

Document will be returned to the name and address you enter to the left.



Commonwealth of Pennsylvania
CERTIFICATE OF ORGANIZATION 3 Page(s)



T112767049

Fee: \$125

In compliance with the requirements of 15 Pa.C.S. § 8913 (relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

1. The name of the limited liability company (*designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation*):
Key Energy Consulting, LLC

2. The (a) address of the limited liability company's initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street	City	State	Zip	County
518 Dreshertown Road	Fort Washington	PA	19034	Montgomery

(b) Name of Commercial Registered Office Provider: _____ County: _____
c/o: _____

TE

4. *Strike out if inapplicable term*

A member's interest in the company is to be evidenced by a certificate of membership interest.

5. *Strike out if inapplicable:*

Management of the company is vested in a manager or managers.

6. The specified effective date, if any is: 09/30/2011

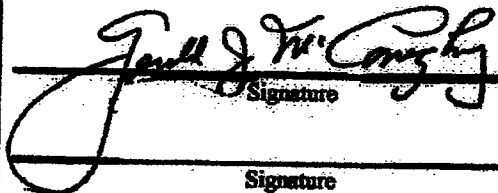
month date year hour, if any

7. *Strike out if inapplicable:* The company is a restricted professional company organized to render the following restricted professional service(s):

8. For additional provisions of the certificate, if any, attach an 8 1/2 x 11 sheet.

IN TESTIMONY WHEREOF, the organizer(s) has (have) signed this Certificate of Organization this

30th day of Sept., 2011.



Signature

Signature

Signature

Docketing Statement DSCB:15-134A (Rev 2001)
Departments of State and Revenue

One (1) required

BUREAU USE ONLY:
Dept. of State Entity # _____
Dept. of Rev. Box # _____
Filing Period _____ Date 3 4 5 _____
SIC/NAICS _____ Report Code _____

Check proper box:

Pennsylvania Entities

business stock
 business non-stock
 professional
 nonprofit stock
 nonprofit non-stock
 statutory close
 management
 cooperative
 insurance
 limited liability company
 restricted professional
limited liability company
 business trust

Foreign Entities

State/Country _____ Date _____

business
 nonprofit
 limited liability company
 restricted professional
limited liability company
 business trust

Other

domestication
 division
 consolidation

1. Entity Name: Key Energy Consulting, LLC

2. Individual name and mailing address responsible for initial tax reports:
Gerald J. McConeghy 518 Dreshertown Rd. FT. Washington, PA
Name Number and street City State Zip 19034

3. Description of business activity: Consulting Energy

4. Specified effective date, if any:
09/30/2011
month/day/year hour, if any

5. EIN (Employer Identification Number), if any:
Pending

6. Fiscal Year End:
December

7. Fictitious Name (only if foreign corporation is transacting business in PA under a fictitious name):



BUREAU OF CORPORATION TAXES
PO BOX 280701
HARRISBURG PA 17128-0701

REVENUE ID

REVENUE ID:..... 1000180893
MAIL DATE:..... 09/22/2013

**KEY ENERGY CONSULTING LLC
518 DRESHERTOWN RD
FT WASHINGTON PA 19034-3012**



Dear Taxpayer:

In March 2013 the Pennsylvania Department of Revenue transitioned corporation taxes to a new tax system for processing tax returns and account management. While most aspects of this system migration are invisible to taxpayers, this notice is to inform you of your new Revenue ID.

The Department of Revenue has assigned each corporate taxpayer a new identification number, your Revenue ID, identified above. The Revenue ID is a unique 10-digit number assigned by the department to a taxpayer, separate from any federally issued identification number(s) or Pennsylvania license number(s). The Revenue ID will be included on all corporation tax correspondence you receive from the Pennsylvania Department of Revenue.

Existing identification numbers including the Corporate Account/Box Number and the federal EIN will continue to be recognized by the department; however, in order for you to receive the best possible service, we encourage you to please immediately begin referencing your Revenue ID any time you interact with the department about your corporation taxes.

Please share this information and your Revenue ID with all those who represent your corporation with the Pennsylvania Department of Revenue, including appropriate employees, corporate officers, tax practitioners and legal representatives.

Should you have any questions regarding the new Revenue ID, please submit your inquiry through the Online Customer Service Center at www.revenue.state.pa.us.

Thank you,
Pennsylvania Department of Revenue

000001000180893 01 01 51165 1 00



Resolution

This 31st day of December 2014, effective January 1st 2015, 100% of the membership shares of Key Energy Consulting LLC are transferred from Gerald J. McConeghy to Anthony Gallagher and Gerald J. McConeghy will have no further interest or equity ownership in the company. For any income taxes owed for calendar year 2014, they will be the responsibility of Gerald J. McConeghy. The value of this transfer is \$1.00, receipt of which is acknowledged by Gerald J. McConeghy.

12-31-2014
Date

Gerald J. McConeghy
Gerald J. McConeghy

Attachment B – As referenced in:

Section 7. **FINANCIAL FITNESS**

Part b. **FINANCIAL RECORDS, STATEMENTS AND RATINGS**

Note: These documents are CONFIDENTIAL.

They will be sent to the Pennsylvania Public Utility Commission Secretary in a separate envelope.

Attachment C – As referenced in:

Section 8. TECHNICAL FITNESS

Part a. **EXPERIENCE, PLAN, STRUCTURE**

Applicant's previous experience in the electric industry:

Prior to Key Energy Consulting, Anthony K. Gallagher worked for PAETEC Energy from 2010 – 2012. Anthony was the first employee in Pennsylvania for PAETEC Energy as the rate caps expired and competitive electric choice started.. As such he held the responsibility for developing the market entry strategy and commercial customer acquisition strategy for PAETEC Energy. Anthony worked directly with commercial accounts and Government agencies helping them procure and manage their electric supply. The geographic focus of PAETEC Energy was in Eastern Pennsylvania. PAETEC Energy was a licensed supplier in PECO and PPL territory. PAETEC Energy also held a brokers license. PAETEC Energy was a division of PAETEC Communications a \$2 Billion publicly traded company. In 2011 it was announced that PAETEC would be acquired by Windstream Communications. In 2012 that acquisition was completed and Windstream sold off the energy division of PAETEC.

In 2012 Anthony went to work for NextEra Energy Services as the Director of Business Development in PJM Territory. NextEra Energy Services is a licensed electric supply company in Pennsylvania. In this role Anthony was responsible for working with channel partners and end user commercial customer throughout all of PJM territory. Anthony worked for NextEra Energy from 2012 to the end of 2014. In this role Anthony developed new relationships with channel partners and end users in all utilities in PJM.

Staffing structure and numbers as well as employee training commitments:

Key Energy Consulting has one full time employee. Training is done through the Greater Philadelphia Chapter of the Association of Energy Engineers, of which Key Energy Consulting is a member. The GPAEE offer o- going educational seminars for its members to further their education and experise.

The next scheduled training we plan on attending is the Certified Energy Procurement Professional Certification on Monday, June 19th.

Other training opportunities are provided by the Sustainable Energy Fund seminars.

Business plans for operations within the Commonwealth:

Key Energy Consulting plans to service large commercial customers and Government agencies in the Eastern half of the Commonwealth. The plan is to utilize the business contacts the Managing Member has developed over the last 25 years in Pennsylvania in working in the de-regulated utilities; first telecommunications and currently energy. The plan is to maintain two offices one in Southeastern

Pennsylvania and the second in Northeastern Pennsylvania. This will provide us with the ability to meet with our customers in person on a regular basis.

DOCUMENTATION OF MEMBERSHIP

Key Energy Consulting is a member of the Greater Philadelphia Association of Energy Engineers.

Key Energy Consulting is a member of the Montgomery County Development Corporation.

Greater Philadelphia Chapter of the Association of Energy Engineers

Pay Membership Dues

Thank you for your payment

The details are listed below and a copy has also been emailed to you.

Anthony Gallagher
 Member: 52550503
 Key Energy Consutling
 950 Union Meeting Road
 Blue Bell, PA 19422-1669
 2159706878
agallagher@keyenergyconsulting.com

Item	QTY	Price	Total
GPAEE Corporate Local Chapter Membership (up to 5 individuals)			
	1	\$150.00	\$150.00
Anthony Gallagher			
		Subtotal:	\$150.00

Date	Payment Method	Amount
	Paid by: Credit Card (mastercard)	
05-22-2017	Card Ending: 7553	\$150.00
	Entered by: Anthony Gallagher	
	Order Total:	\$150.00
	Amount Paid:	\$150.00
	Amount Due:	\$0.00
	Closed	

MCDC Company Verification Form

Company Name: Key Energy Consulting

of Employees: 1

Main Phone Number: 215-970-6878

Main Fax Number:

Toll Free:

Website Address: www.keyenergyconsulting.com

Facebook Address:

Twitter Address:

LinkedIn Address:

Business Category: Professional, Scientific, and Technical Services

Company Description:

Maximum 250 total characters

CONTACT INFORMATION

Anthony F. Gallagher

Title: Energy Consultant

950 Union Meeting Road

Blue Bell, PA 19422

Direct Dial: 215-970-6878 **Ext:**

Mobile: 570-690-7206

Email: agallagher@keyenergyconsulting.com

RENEWAL INVOICE

Anthony F. Gallagher
Key Energy Consulting
950 Union Meeting Road
Blue Bell, PA 19422

Invoice Number: MR4-2017-1

Date: March 2, 2017

Due: April 1, 2017

2017 – 2018 Annual Membership Dues Individual Membership	\$ 150.00
---	-----------

MCDC continues to seek ways to increase its value to you. Our Board and Staff have been working to develop new programs and services, strengthen our existing programs and services, and continue to stay involved in government and community issues that impact business in Montgomery County. It is because of your financial support, we can continue to provide you and Montgomery County with quality services.

Thank you for your continued commitment and support! We welcome your comments and suggestions.

Check Payments:

Make your check payable to Montgomery County Development Corp. or MCDC and mail to:

Attn: Membership
Human Services Center
P.O. Box 311
Norristown, PA 19404-0311

Credit Card Payments:

Call or email, Janet Otto (610)272-5000 / jotto@montcopa.org to request an electronic invoice for your credit card payment. A small processing fee will be added to the cost of the membership fee for credit card transactions.

6/13



6/22



Anthony K. Gallagher

Summary

An Energy Professional with over 20 years of experience helping commercial clients and government agencies in Pennsylvania with de-regulated utility services including Energy and Telecommunications.

Professional Experience

Key Energy Consulting

July 2015- Present

- Trained in Demand Side Management from PECO Smart Ideas.
- PECO Smart Ideas Training for Phase 2 and Phase 3
- Utility bill auditing
- Energy consumption tracking
- Lighting efficiency studies conducted
- Trained in EnergyStar Portfolio Manager

NextEra Energy Services, Pennsylvania

2012-2014

Manager of Business Development PJM – Responsibilities included development of procurement strategies and execution of the strategies for Government, Large Commercial and Industrial Accounts. Worked within multiple Regional Transmission Organizations to develop procurement plans.

Accomplishments:

- Developed New Channel Partner relationships: initiated the contact and on boarding of new Channel Partners that resulting in Revenue of over \$1,000,0000 annually.
- Delivered over \$2,000,000 in revenue through Channel Partners in less than two years through Channel Partners.
- Expanded Chanel Partner Relationships in PJM, NYISO and NEPOOL

PAETEC Energy, Philadelphia, PA

2010-2012

Major Account Executive PJM Territory

Responsibilities included developing market entry strategy for PAETEC Energy into PJM Territory as the rate caps expired. Responsible for working with Large Commercial and Industrial Accounts, Government Accounts, Medium Commercial Accounts. Responsible for helping clients procure and manage electric and natural gas supply.

PAETEC Communications, Philadelphia, PA
Senior Account Executive

2000- 2010

Responsibilities included developing marketing and sales strategy of de-regulated telecommunications services in Eastern Pennsylvania. Responsible for working with Large Commercial and Industrial Accounts, Government Accounts, Medium Commercial Accounts, Educational institutions.

Developed and implemented the successful market entry plan for PAETEC Communications into the Lehigh Valley and Northeastern PA markets, this include the network build out into Wilkes Barre and Scranton.

ATX Telecommunications Services, Philadelphia, PA
Senior Account Executive

1995-2000

Responsibilities included developing marketing and sales strategy of the recently de-regulated local phones services in Eastern Pennsylvania. Responsible for working with Large Commercial and Industrial Accounts, Government Accounts, Medium Commercial Accounts, Educational institutions

Education

Villanova University, Villanova, PA (1988 – 1992)
Bachelor of Arts Degree – Political Science
Minor in Classical Studies

Professional Affiliations

Montgomery County Development Corporation Member
The Association of Energy Engineers Philadelphia Chapter Member