

STEVENS & LEE
LAWYERS & CONSULTANTS

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August 18, 2017

VIA HAND DELIVERY

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

RECEIVED
2017 AUG 18 AM 10:16
PA PUC
SECRETARY'S BUREAU
FRONT DESK

**Re: Application of Spring Energy RRH, LLC d/b/a Spring Power & Gas for Approval to Offer, Render, Furnish or Supply Natural Gas Services as a Supplier
Docket No. A-2017-2614651**

Dear Secretary Chiavetta:

Enclosed please find the responses of Spring Energy RRH, LLC d/b/a Spring Power & Gas to the data requests issued in this matter. Please note that the tax returns, bank statements, and loan agreement contain **Confidential** information, and have been marked as such and provided in a separate envelope for filing under seal.

Thank you and please feel free to contact me if you have any questions or need any additional information.

Very truly yours,

STEVENS & LEE



Michael A. Gruin

Encl.

cc: Lee Yalcin, Bureau of Technical Utility Services (via email)

Philadelphia • Reading • Valley Forge • Allentown • Harrisburg • Lancaster • Scranton
• Wilkes-Barre • Princeton • Charleston • New York • Wilmington

A PROFESSIONAL CORPORATION

Docket No. A-2017-2614651
Spring Energy RRH, LLC d/b/a/ Spring Power and Gas
Responses to Data Requests

1. Reference Application, Section 4.d – Bonding Letters - Applicant failed to provide the required bonding letters. Please provide the missing information.

RESPONSE:

See enclosed NGDC bonding letters.

2. Reference Application, Section 7.b – Financial Fitness. Applicant did not provide sufficient documentation to demonstrate financial fitness. Please provide financial fitness documentation that includes two years of income tax filings and most recent consecutive three months of banks statements. Applicant may elect to mark the information as confidential.

RESPONSE:

See enclosed Confidential tax returns and bank statements.

3. Reference Application, Section 12 – Notarized Proofs. Please provide current notarized proofs of publication for the Johnstown Tribune, the Philadelphia Daily News, the Pittsburgh Post-Gazette, the Willamsport Sun-Gazette, and the Scranton Times.

RESPONSE:

The Applicant has requested re-publication of the required notice from the newspapers in questions, but has not received the notarized proofs of publication back yet. Applicant will submit the proofs of publication upon receipt and respectfully requests a twenty day extension to allow for receipt and submission of the proofs of publication.

4. Reference Application, Section 7.c – Applicant failed to include the loan agreement mentioned in Exhibit 7.c. Please provide a copy of this loan agreement. Applicant may elect to mark the information as confidential.

RESPONSE:

See enclosed Confidential Loan Agreement.

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Responses to Data Requests

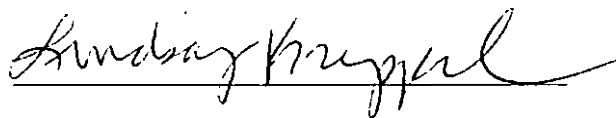
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Natural Gas Supplier :
License Application of :
Spring Energy RRH, LLC, d/b/a Spring :
Power and Gas :

Docket No. A-2017-2614651

VERIFICATION

I, Lindsay Kreppel, holding the title Attorney, Regulatory and New Markets Manager, with Spring Energy RRH, LLC, hereby state that the facts set forth above 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 false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



Date: 7/28/2017

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PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

August 9, 2017

Mr. Michael Gruin
Spring Energy RRH, LLC
17 N. 2nd Street, 16th Floor
Harrisburg, PA 17101

Re: Security Requirement for Spring Energy RRH, LLC

Dear Mr. Gruin:

Philadelphia Gas Works ("PGW") is aware that Spring Energy RRH, LLC has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works. You have stated that, in performing these services, Spring Energy RRH, LLC will take title to any delivered natural gas.

Under its tariff, Philadelphia Gas Works could require Spring Energy RRH, LLC to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate. Upon final approval of your application to PGW and prior to enrolling customers, security in the first year for firm pools will be required based on your estimated firm pool size. It will be updated annually based on actual firm pool size.

At this time, Spring Energy RRH, LLC does not need to post a bond or other form of security.

If you have any questions concerning the foregoing, please contact me at 215-684-6725.

Sincerely,

A handwritten signature in black ink that reads "J.C. ZUK".

JOHN C. ZUK
Vice President, Gas Supply

NL/dls

July 27, 2017

Lindsay Kreppel
Attorney
Spring Energy RRH, LLC
200 Park Avenue South, Suite 1301
New York, NY 10003

Dear Lindsay Kreppel:

We are pleased that Spring Energy RRH, LLC has applied for a license to provide Natural Gas Supply Service on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Columbia Gas has performed a creditworthiness evaluation for Spring Energy RRH, LLC.

Under Paragraph 2.4.1 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas will require the Natural Gas Supplier to provide financial information in order for the Company to establish the Natural Gas Supplier's creditworthiness.

We have determined that Spring Energy RRH, LLC currently meets Columbia Gas' creditworthiness requirement.

Upon receipt of the required security requirement and the execution of the required agreements Spring Energy RRH, LLC will satisfy the financial security requirement to provide Natural Gas Supply Service to Columbia Gas customers.

Please feel free to contact me at 614-460-4217 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

Patricia Chang

Patricia Chang
Manager of Choice and Transportation Support Services



Energy to do more®

UGI Utilities, Inc.
2525 North 12th Street
Suite 360
Post Office Box 12677
Reading, PA 19612-2677

July 27, 2017

Michael A. Gruin
STEVENS & LEE
A Stevens & Lee/Griffin Company
17 N. 2nd Street, 16th Fl. | Harrisburg, PA 17101

RE: UGI Financial Security Requirements

Dear Mr. Gruin,

UGI Utilities, Inc. ("UGIU") has reviewed the request of Spring Energy RRH, LLC ("SPRING ENERGY") for approval to operate as a Natural Gas Supplier. Based on this review and the requirement that SPRING ENERGY must post security as specified in the UGI Utilities, Inc.-Gas Division ("UGI"), UGI Penn Natural Gas, Inc. ("PNG") and/or UGI Central Penn Gas, Inc. ("CPG") Supplier Coordination Tariffs before it serves customers on the UGI, PNG and/or CPG distribution systems, UGIU has determined that SPRING ENERGY has demonstrated adequate creditworthiness to satisfy any costs UGI, PNG and/or CPG may incur in the event they operate as a supplier of last resort due to a default on the part of SPRING ENERGY.

This determination may change in the event there is a material deterioration in SPRING ENERGY's financial condition, if SPRING ENERGY's obligations to UGI, PNG and/or CPG exceed the amount of the financial security provided, if the financial security is withdrawn or is deemed to be null and void or inadequate due to the material financial deterioration of any guarantor, or if SPRING ENERGY fails to abide by the terms and conditions of the UGI, PNG and/or CPG Gas Tariffs and the UGI, PNG and/or CPG Natural Gas Supplier Coordination Tariffs.

Please feel free to contact me with any additional questions that you may have. I can be reached at (610) 796-3520

Sincerely,

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



National Fuel

June, 23 2017

Richard Booth, President of Retail Operations
Spring Energy RRH, LLC d/b/a Spring Power & Gas
111 East 14th Street, #105
New York, NY 10003

RE: Security Requirement Spring Energy RRH, LLC d/b/a Spring Power & Gas

Dear Richard,

Pursuant to 66 Pa. C. S. § 2208 (c), an applicant for a natural gas supplier license in the Commonwealth of Pennsylvania must furnish security to each utility where the supplier will do business to ensure the financial responsibility of such natural gas supplier. To this end, National Fuel Gas Distribution Corporation ("National Fuel") will perform a credit review and analysis of Spring Energy RRH, LLC d/b/a Spring Power & Gas ("SPG") and determine at the appropriate time whether SPG must post a security deposit acceptable to National Fuel in order to operate as a supplier on National Fuel's system.

SPG's security requirement to serve Pennsylvania customers is dependent on the type of transportation service utilized by SPG. There is no Natural Gas Supplier (NGS) security requirement for customers that will be enrolled in National Fuel's Purchase of Receivable (POR) program. As such, SPG will not be required to post security for customers enrolled in the POR program. A security deposit will be required for transportation customers not enrolled in the POR program.

Should you have any questions concerning the above, please contact me at 716-857-7599.

Yours truly,

Nathan E. Barnes
Transportation Services Department

Lynda W. Petrichevich
Vice President, Rates and Regulatory Affairs

Peoples Service Company LLC
Phone: 412-208-6528; Fax: 412-208-6577
Email: lpetrichevich@peoples-gas.com

June 27, 2017

Lindsay Kreppel
Attorney, Regulatory & New Markets Manager
Spring Energy RRH, LLC d/b/a Spring Power & Gas
200 Park Avenue South, Suite 1301
New York, NY 10003

Dear Ms.Kreppel:

We are pleased that Spring Energy RRH, LLC d/b/a Spring Power & Gas ("Spring Power and Gas) has applied for a license to provide natural gas services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, Peoples TWP, and Peoples Natural Gas LLC-Equitable Division ("the Companies").

Since Spring Power & Gas is not currently serving customers on the Peoples systems, we have determined at this time that Spring Power & Gas does not need a bond or other financial security requirement to provide these services to the Company's customers.

If a Pool is established, and customers are enrolled which alters the creditworthiness requirement or the Company's exposure to Spring Power & Gas provision of services on the Peoples' system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

If you have any questions feel free to contact me at 412-208-6528 or by email at Lynda.W.Petrichevich@peoples-gas.com.

Lynda W. Petrichevich
Vice President- Regulatory Affairs
Peoples Natural Gas Company LLC

cc: Steven Kolich
Stephen Kelly



An Exelon Company

August 10, 2017
PECO - Exelon Corporation
Energy Acquisition
2301 Market Street
Philadelphia, PA. 19101

Spring Energy RRH, LLC
Lindsay Kreppel
Attorney, Regulatory and New Markets Manager
200 Park Avenue South, Suite 1301
New York, NY 10003
lindsaykreppel@rrhenergy.us

Energy Acquisition is providing this notification letter that Spring Energy RRH, LLC has met the creditworthiness business requirement involved with the Pennsylvania Gas Choice - Low Volume Transportation program, pursuant to the receipt of an initial Surety of \$35,000.00 Guaranty. The Surety may be submitted to PECO via three acceptable forms; a Cash Deposit, a Letter of Credit, or a Surety bond. PECO will hold any surety to cover potential obligations to PECO and other system costs that could result from failure of a Supplier to meet its competitive Natural Gas Supply service delivery obligations.

Please note, although the creditworthiness requirements were met, as referenced within Section 7.13 (Creditworthiness of a Natural Gas Supplier (NGS) Serving Low Volume Transportation Customers) of the Gas Service Tariff, PECO has the right to re-assess the creditworthiness of the company if PECO has any reason to suspect a change in the marketer's financial condition.

If you should have any questions regarding this matter, please contact the Electric & Gas Choice Hotline at 215-841-3700.

Sincerely,

A handwritten signature in cursive script that reads "Carol Reilly".

Carol Reilly
Manager
Energy Acquisition



VALLEY ENERGY

523 S. Keystone Avenue, P.O. Box 340, Sayre, PA 18840
800/998-4427 • 570/888-9664 • FAX 570/888-6199

June 29, 2017

VIA EMAIL

Attorney Michael A. Gruin
Stevens & Lee
A Stevens & Lee/Griffin Company
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101

RE: Spring Energy RRH, LLC

Dear Attorney Gruin:

We understand that Spring Energy RRH, LLC has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania including our company's service area.

Because Spring Energy RRH, LLC intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Spring Energy RRH, LLC will not be required to post a bond or other form of financial security instrument to provide these services in our service area. However, if the services provided change in the future, we reserve the right to require security from Spring Energy RRH, LLC as deemed appropriate.

If you have any questions, please contact Mrs. Marjorie Johnston at 570-888-9664.

Sincerely,

Edward E. Rogers
President & CEO

EER/ss

cc: M. Johnston, Valley Energy