



NavigatePower

The attached filing is a reply to Data request on Navigate Power LLC's Natural Gas Supplier Application at docket number A -2017-2603811.

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Navigate Power LLC, d/b/a _____, for approval to offer, render, furnish, or supply natural gas supply services as a Broker 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:

Navigate Power LLC
2211 N Elston Ave Suite 201
Chicago IL 60614
www.navigatepower.com
tel: 888-601-1789

- 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.

Exhibit A

- 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.

Lilian Perez
Operations Coordinator
2211 N Elston Ave Suite 201
Chicago IL 60614
Office: 312-462-3675
Fax: 888-783-0381
Email: Lperez@navigatepower.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.

Jonathan T Linnemeyer
Attorney at Law
Lyons Law Group, LLC
5333 Main Street
Downer Grove, IL 60515
Office: 630-852-2529
Cell: 630-301-8173
Fax: 630-597-2529
Email: JonathanL@KLLawFirm.com

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CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS: 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 Natural Gas 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 NGSS.

Primary Contact

Marsia Ritz
Director of Operations
2211 N Elston Ave Suite 201
Chicago IL 60614
Sales@navigatepower.com
Office: 888-601-1789
Fax: 630-597-2529

Secondary Contact

Brian Cecola
President
2211 N Elston Ave Suite 201
Chicago IL 60614
Email: Bcecola@navigatepower.com
Office: 888-601-1789
Fax: 630-597-2529

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

Definitions

- Supplier – an entity which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of an natural gas distribution company
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of natural gas but does not take title to the natural gas.

- The Applicant is presently doing business in Pennsylvania as a
- natural gas interstate pipeline
 - municipality providing service outside its municipal limits
 - local gas distribution company
 - retail supplier of natural gas services in the Commonwealth
 - a natural gas producer
 - a broker/marketer engaged in the business of supplying natural gas services
 - Other. (Identify the nature of service being rendered)

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OR

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- The Applicant is not presently doing business in Pennsylvania.

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b. APPLICANT'S PROPOSED OPERATIONS: The Applicant proposes to operate as a:

- Supplier or Aggregator of natural gas services
- Municipal supplier of natural gas services
- Cooperative supplier of natural gas services
- Broker/Marketer engaged in the business of supplying natural gas services
 - Check here to verify that your organization will not be taking title to the natural gas nor will you be making payments for customers.
- Other (Describe):

c. PROPOSED SERVICES: Describe in detail the natural gas supply services which the Applicant proposes to offer.

Navigate Power LLC will only act as a broker to natural gas customers. m

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.

Steven Heeley
5333 Main Street
Downers Grove, IL 60515
P: 630-717-9541
F: 630-717-9543
Steven@SLHeeleyTax.com
www.SLHeeleyTax.com

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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.

See Exhibit E

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**

**Columbia Gas[®]
of Pennsylvania**
A NiSource Company

August 25, 2017

Mikayla Findley
Navigate Power
2211 N. Elston Ave, Suite 201
Chicago, Illinois 60614

Dear Mikayla Findley:

We are pleased that Navigate Power has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Navigate Power could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. Navigate Power has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Navigate Power does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to Navigate Power changes in the future, Columbia Gas might deem it appropriate to require Navigate Power to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4712 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

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An Exelon Company

August 24h, 2017

Navigate Power, LLC
2211 N Elston Ave Suite 201
Chicago, IL 60614

Re: Bonding Requirements

Dear Mikayla Findley:

PECO is aware that Navigate Power, LLC has applied for a license to provide brokering and consulting services to commercial and industrial customers on the distribution system of PECO.

In making such an application Navigate Power, LLC could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Navigate Power, LLC has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers will not take title to any delivered natural gas; nor will accept any customer payments or deposits. Therefore, PECO has determined at this time that Navigate Power, LLC does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by Navigate Power, LLC or the creditworthiness requirement for PECO's exposure to Navigate Power, LLC changes in the future, PECO reserves the right to require Navigate Power, LLC to provide a bond or other financial security instrument.

If you should have any questions regarding this matter, please contact Chris Sauerbaum at 215-841-6422 or myself at 215-841-6452.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carlos P. Thillet".

Carlos P. Thillet
Manager, Gas Supply and Transportation
2301 Market St S9-1
Philadelphia, Pa 19103

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PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

September 7, 2017

Mr. Brian Cecola, CEO
Navigate Power LLC
2211 N. Elston Avenue
Suite 201
Chicago, IL 60614

Re: Security Requirement Bond for Navigate Power LLC

Dear Mr. Cecola:

Philadelphia Gas Works ("PGW") is aware that Navigate Power 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.

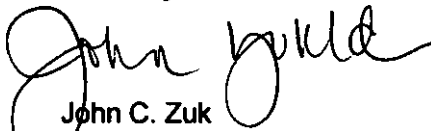
As you know, in making such an application, Navigate Power LLC must furnish acceptable security to each utility where Navigate Power LLC will do business. As such, under its tariff, Philadelphia Gas Works could require Navigate Power LLC to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate.

However, you have indicated, and it is Philadelphia Gas Works' understanding, that Navigate Power LLC intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services Navigate Power LLC will never take title to any delivered natural gas.

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Navigate Power LLC does not need to post a bond or other form of security to operate in its service territory. If the services provided by Navigate Power LLC should change, Philadelphia Gas Works reserves the right to require security from Navigate Power LLC as it deems appropriate.

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

Sincerely,


John C. Zuk
Vice President, Gas Supply

NL/dls

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VALLEY ENERGY

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

August 24, 2017

VIA EMAIL

Mikayla Findley
Navigate Power
2211 N. Elston Ave., Suite 201
Chicago, IL 60614
mfindley@navigatepower.com

Dear Ms. Findley:

We understand that Navigate Power 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 Navigate Power intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Navigate Power 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 Navigate Power 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

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375 North Shore Drive
Pittsburgh, Pennsylvania 15212

www.peoples-gas.com

Lynda W. Petrichevich
Vice President, Regulatory Affairs

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

August 25, 2017

Brian Cecola
CEO
Navigate Power LLC
2211 N Elston Ave Suite 201
Chicago, IL 60614

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Dear Mr. Cecola:

We are pleased that Navigate Power LLC 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 Natural Gas Company LLC – Equitable Division, and Peoples Gas Company LLC (formerly Peoples TWP) ("the Companies").

Since Navigate Power LLC is not currently serving customers on the Peoples systems, we have determined at this time that Navigate Power LLC 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 Navigate Power LLC 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.

Sincerely,

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

Cc: Carol Scanlon
Stephen Kelly



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

August 29, 2017

Mikayla Findley
Operations Coordinator
Navigate Power, Inc.
2211 N. Elston Avenue, Suite 201
Chicago, Illinois 60614

RE: Navigate Power, Inc. application to serve as a Natural Gas Broker

Dear, Ms. Findley,

Based on your assertion that Navigate Power, Inc. ("NAVIGATE") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities Inc. ("UGIU") has concluded that NAVIGATE will not need to post security with UGI-Central Penn Gas ("CPG"), UGI-Penn Natural Gas ("PNG") or UGI Utilities Gas Division ("UGI"). This is based on the declaration that NAVIGATE will not be taking title to gas or directly serving end use customers. This also assumes that NAVIGATE will be acting in conjunction with a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the respective UGIU tariffs. If NAVIGATE wishes to directly serve Choice customers in the service territories of UGI, PNG and/or CPG in the future as a natural gas supplier, it will have to post security as specified in the respective UGI tariffs prior to the commencement of the service.

Please feel free to contact me with any additional questions that you may have.

Sincerely,

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

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National Fuel

August 31, 2017

Brian Cecola, CEO
Navigate Power LLC
2211 North Elston Avenue, Suite 201
Chicago, IL 60514

Re: Security Requirement for Navigate Power LLC

Dear Brian,

National Fuel Gas Distribution Corporation ("NFGDC") is aware Navigate Power LLC (NP) has filed an application with the Pennsylvania Public Utility Commission to supply natural gas service to the public in Pennsylvania and specifically within the service territory of NFGDC.

As you know, in making such an application, NP must furnish acceptable security to each utility where NP will do business. As such, under its tariff, NFGDC could require NP to provide a bond or other financial security instrument in an amount that NFGDC determines to be appropriate.

However, you have indicated, and it is NFGDC's understanding that NP intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, NP will never take title to any delivered natural gas.

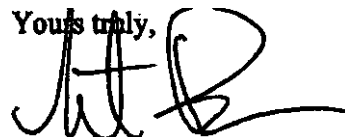
Based upon your representations, NFGDC has determined that, at this time, NP does not need to post a bond or other form of security to operate in its service territory. However, if the services provided by NP change in the future, NFGDC reserves the right to require security from NP as it deems appropriate.

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

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Yours truly,


Nathan E. Barnes
Transportation Services Department



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NAVIGATE POWER LLC
2211 N ELSTON AVE STE 201
CHICAGO IL 60614-2900

Scheduled Delivery Date: 09/27/17

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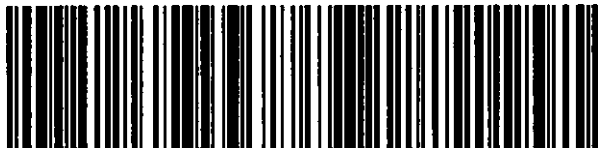
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WAIVER OF SIGNATURE

SCHEDULED DELIVERY 12:00 PM

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SECRETARY
400 NORTH ST
KEYSTONE BUILDING
HARRISBURG PA 17120-0211

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