

ATTORNEYS AT LAW

222 Mount Airy Road. Suite 200 Basking Ridge, NJ 07920-2335 (P) 908.753.8300 (F) 908.753.8301

WWW.BMG.LAW

GABRIELLE A. FIGUEROA gfigueroa@bmg.law

April 23, 2018



APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

VIA FEDERAL EXPRESS

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

> Re: The O.E. Group Inc. Natural Gas Supplier License Application Update Docket No. A-2018-3000443

Secretary Chiavetta:

On behalf of our client The O.E. Group Inc. ("O.E. Group"), enclosed please find a response to your March 19, 2018 letter, received on March 22, 2018.

Response to Data Requests 1-3:

- a. A corrected first page of the application removing the errant comma from "The O.E. Group Inc." is attached. We apologize for the errors in the application.
- b. The corrected first page contains the web address for the O.E. Group.
- c. The corrected first page also contains the primary and alternate contact titles for complaints and customer service.

Response to Data Request 4:

d. Signed and dated Articles of Incorporation for the O.E. Group are attached.

Response to Data Request 5:

e. Bonding letters from the Pennsylvania utilities are attached.

Response to Data Requests 6:

f. A corrected tax certification removing the comma from "The O.E. Group Inc." is attached.

Response to Data Request 7:



APR 23 2018

Secretary, Pennsylvania Public Utility Commission April 23, 2018 Page 2 of 2

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

g. The New York Public Service Commission ("PSC") does not current require licensure or registration for brokers of electric and gas, and therefore, the O.E. Group does not have any New York license information to provide in response to this request.

The O.E. Group refers to the PSCs website for more information: http://www3.dps.ny.gov/W/PSCWeb.nsf/All/753D3D35C877963485257687006F 39DB?OpenDocument which provides that brokers and aggregators are not currently required to be licensed but must comply with the PSC's Uniform Business Practices ("UBPs").

Response to Data Request 8:

h. A corrected Application Affidavit and Operations Affidavit is attached.

The O.E. Group looks forward to providing natural gas broker services in Pennsylvania. Thank you for your attention to this application.

truly yours.

Enclosures

cc: Stephen Jakab via electronic mail only, sjakab@pa.gov

I, \triangle HALCS BELGMA, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

NAFTALI MOSKOVITS Notary Public, State of New York No. 01MO6133814 Qualified in Kings County Commission Expires 09/19/2021

3/28/17



APR 23 2018



APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Version Revised 08/28/17

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of <u>The O.E. Group Inc.</u>, d/b/a _____, for approval to offer, render, furnish, or supply natural gas supply services as a(n)<u>Broker/Marketer</u> 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:

The O.E. Group Inc. 5314 16th Avenue, Suite 187 Brooklyn, NY 11204

T: 718-403-9444 www.theoegroup.com

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.

Registered Agents, Inc. 1150 First Avenue, Suite 511 King of Prussia, PA 19406

T: 610-456-2133 F: 855-330-1010

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.

Charles Bergman, President 5314 16th Avenue, Suite 187 Brooklyn, NY 11204 T: 718-403-9444 F: 718-972-5068 E: cbergman@theoegroup.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.

Murray E. Bevan Bevan, Mosca & Giuditta, P.C. 222 Mount Airy Road, Suite 200 Basking idge, N 07920 T: 908-753-8300 F: 908-753-8301 E: mbevan@bmg.law

e. 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 <u>REQUIRED</u>) 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.

Charles Bergman, President 5314 16th Avenue, Suite 187 Brooklyn, NY 11204

T: 718-403-9444 F: 718-972-5068 E: cbergman@theoegroup.com Louis Weill, Office Manager 5314 16th Avenue, Suite 187 Brooklyn, NY 11204 T: 718-403-9444 F: 718-972-5069 E: louisw@theoegroup.com

4



APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

CERTIFICATE OF INCORPORATION

OF

THE O.E. GROUP INC.

Under Section 402 of the Business Corporation Law

FILER:

FURNITURE LEADERS CHARLES BERGMAN 5314-16TH AVE., SUITE 187 BROOKLYN, NY 11204

HUBCO #29 DRAWDOWN

STATEMENT OF INCORPORATOR IN LIEU OF ORGANIZATION MEETING

OF

THE O.E. GROUP INC.

The certificate of incorporation of the above-named corporation having been filed in the Office of the Secretary of State of the State of New York, the undersigned, being the incorporator named in said certificate, does hereby state that the following actions were taken on this day for the purpose of organizing this corporation:

- 1. By-Laws for the regulation of the affairs of the corporation were adopted by the undersigned incorporator and were ordered inserted in the minute book immediately following the copy of the certificate of incorporation and before this instrument.
- 2. The undersigned hereby resigns as incorporator of the corporation as of the date set forth below.

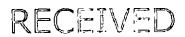
The following are hereby elected as the director(s) of the corporation to hold office until the first annual meeting of the corporation or until their successors are elected and qualified:

CHARLES BERGMAN

Dated: Upon filing date

Bun B. Hallend

Bruce B. Hubbard Incorporator President, Hubbard Inc. d/b/a Hubco Incorporation Services



APR 23 2018

CERTIFICATE OF INCORPORATION

OF

THE O.E. GROUP INC.

Under Section 402 of the Business Corporation Law

IT IS HEREBY CERTIFIED THAT:

(1) The name of the Corporation is:

THE O.E. GROUP INC.

(2) This Corporation is formed to engage in any lawful act or activity for which a corporation may be organized under the Business Corporation Law, provided That it is not formed to engage in any act or activity requiring the consent or approval of any state official, department, board, agency or other body without such consent or approval first being obtained.

For the accomplishment of the aforesaid purposes, and in furtherance thereof, the Corporation shall have, and may exercise, all of the powers conferred by the Business Corporation. Law upon corporations formed thereunder, subject to any limitations contained in Article 2 of said law or in accordance with the provisions of any other statute of the State of New York.

(3) The number of shares which the Corporation shall have the authority to issue is <u>200 SHARES AT NO PAR VALUE</u>.

(4) The county, within this state, in which the office of the corporation is to be located is:

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(5) The Secretary of State is designated as agent of the Corporation upon whom process against it may be served. The post office address to which the Secretary of State shall mail a copy of any process against the Corporation served upon him is:

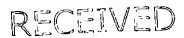
CHARLES BERGMAN 5314-16TH AVE. SUITE 187 BROOKLYN, NY 11204

The undersigned incorporator is of the age of eighteen years or older. IN WITNESS WHEREOF, this certificate has been subscribed this <u>JUNE 7, 2011</u> by the undersigned who affirms that the statements made herein are true under the penalties of perjury.

Bun B H

Bruce B. Hubbard, Incorporator President, Hubbard Inc. d/b/a Hubco Incorporation Services 77 East John Street, Hicksville, NY 11801

Address



APR 23 2018



Lynda W. Petrichevich Vice President, Regulatory Affairs

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

April 2, 2018

Charles Bergman President The O.E. Group Inc. 5314 16th Avenue, Suite 187 Brooklyn, NY 11204 375 North Shore Drive Pittsburgh, Pennsylvania 15212

www.peoples-gas.com



APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Dear Mr. Bergman:

We are pleased that The O.E. Group Inc. 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 The O.E. Group Inc. is not currently serving customers on the Peoples systems, we have determined at this time that The O.E. Group Inc. 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 The O.E. Group Inc. 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

April 18, 2018

Gabrielle A. Figueroa Bevan, Mosca & Giuditta, P.C. 222 Mount Airy Road, Suite 200 Basking Ridge, NJ 07920

RE: O.E. Group Inc. application to serve as a Natural Gas Broker

RECENT

APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Dear Ms. Figueroa,

Based on your assertion that O.E. Group Inc., ("O E GROUP") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities Inc. ("UGIU") has concluded that O. E. GROUP 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 O. E. GROUP will not be taking title to gas or directly serving end use customers. This also assumes that O. E. GROUP 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 O. E. GROUP 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,

) E. J. M.

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



A NiSource Company

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APR 23 2018

PA PUBLIC UTILITY COMMISSION

SECRETARY'S BUREAU

March 29, 2018

Charles Bergman The O.E. Group Inc. 5314 16th Ave, Suite 187 Brooklyn, NY 11204

Dear Charles Bergman:

We are pleased that The O.E. Group Inc. 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, The O.E. Group Inc. 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. The O.E. Group Inc. has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that The O.E. Group Inc. does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

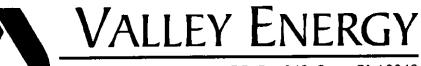
If the creditworthiness requirement or Columbia Gas' exposure to The O.E. Group Inc. changes in the future, Columbia Gas might deem it appropriate to require The O.E. Group Inc. to provide a bond or other financial security instrument.

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



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

April 10, 2018

VIA EMAIL

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APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Gabrielle A. Figueroa Bevan, Mosca & Giuditta, P.C. 222 Mount Airy Road, Suite 200 Basking Ridge, NJ 07920 gfigueroa@bmg.law

RE: The O.E. Group, Inc.

Dear Gabrielle:

We understand that The O.E. Group, Inc. 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 The O.E. Group, Inc. intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that The O.E. Group, Inc. 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 The O.E. Group, Inc. as deemed appropriate.

If you have any questions, please contact Jamie Levering at 570-888-9664.

Sincerely,

Kouges-

Edward E. Røgers President & CEO

EER/ss

cc: J. Levering, Valley Energy



April 11, 2018

Mr. Charles Bergman, President The O.E. Group Inc. 5314 16th Avenue, Suite 187 Brooklyn, NY 11204 Email: <u>cberman@theoegroup.com</u> gfigueroa@bmg.law

RECEIVER

APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Re: Security Requirement Bond for The O.E. Group Inc.

Dear Mr. Bergman:

Philadelphia Gas Works ("PGW") is aware that The O.E. Group Inc.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, The O.E. Group Inc. must furnish acceptable security to each utility where The O.E. Group Inc. will do business. As such, under its tariff, Philadelphia Gas Works could require The O.E. Group Inc. 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 The O.E. Group Inc. intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services The O.E. Group Inc. will never take title to any delivered natural gas.

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

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

Sincerely,

Vice President, Gas Supply

NL/dls



January 23, 2018

Charles Bergman, President The O. E. Group Inc. 5314 16th Avenue, Suite 187 Brooklyn, NY 11204

Re: Security Requirement for The O. E. Group Inc.

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APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Dear Charles,

National Fuel Gas Distribution Corporation ("NFGDC") is aware The O. E. Group Inc. (OEG) 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, OEG must furnish acceptable security to each utility where OEG will do business. As such, under its tariff, NFGDC could require OEG 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 OEG intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, OEG will never take title to any delivered natural gas.

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

If you have any questions concerning the foregoing, please contact me at 716-857-7541.

Yours truly,

Micole Baier

Nicole Baier Transportation Services Department



April 18, 2018

O.E. Group, Inc.

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APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

c/o Bevan, Mocsa & Giuditta, P.C. 222 Mount Airy Road, Suite 200 Basking Ridge, NJ 07920

Re: Broker Requirements

Dear O.E. Group Inc:

PECO is aware that O.E. Group Inc 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, O.E. Group Inc could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. O.E. Group Inc has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers, and 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 O.E. Group Inc 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 O.E. Group Inc or the creditworthiness requirement for PECO's exposure to O.E. Group Inc changes in the future, PECO reserves the right to require O.E. Group Inc 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,

Carlos P. Thille

Carlos P. Thillet Manager, Gas Supply and Transportation 2301 Market Street Philadelphia, Pa 19103

Appendix A

APPLICATION AFFIDAVIT

SS.

[Commonwealth/State] of New York

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APR 23 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

County of	K: hgs	

Charles Bergman	, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:
[He/she is the President	(Office of Affiant) of The O.E. Group Inc. (Name of Applicant);]

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

That the Applicant herein ______ has the burden of producing information and supporting

documentation demonstrating its technical and financial fitness to be licensed as an natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein The O.E. Group Inc. has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein The O.E. Group Inc. 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 The O.E. Group Inc. 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.

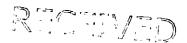
Signature of Affiant

Sworn and subscribed before me this 28 day of MARCH

Signature of official administering oath

9/19/21 My commission expires

NAFTALI MOSKOVITS Notary Public, State of New York No. 01MO6133814 Qualified in Kings County Commission Expires 09/19/2021 Appendix B



OPERATIONS AFFIDAVIT

APR 23 2018

	PA PUBLIC UTILITY COMMISSION
[Commonwealth/State] of New 131-k :	SECRETARY'S EUREAU
:	SS.
County of Kings	
Charles Bergman , Affiant, being duly [sworn/affirmed	d] according to law.
deposes and says that:	-1,
[He/she is the President (Office of Affiant) of Th	ne O.E. Group Inc.
(Name of Applicant);]	

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

_ The O.E. Group Inc.

That acknowledges that is	Applicantj may have
obligations pursuant to this Application consistent with the Public Utility Code of th	e Commonwealth of
Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other a	pplicable statutes or
regulations including Emergency Orders which may be issued verbally or in writing di	uring any emergency
situations that may unexpectedly develop from time to time in the course of	doing business in
Pennsylvania.	

The O.E. Group Inc., the Applicant herein, asserts that [he/she/it] possesses the requisite That technical, managerial, and financial fitness to render natural gas supply 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.

The O.E. Group Inc. , the Applicant herein, certifies to the Commission that it is subject to, will pay, That 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 22 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 natural gas 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).

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)

The O.E. Group Inc. That _______, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 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 Office of Communications 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 28 day of MARCM, 2018.

9/19/21

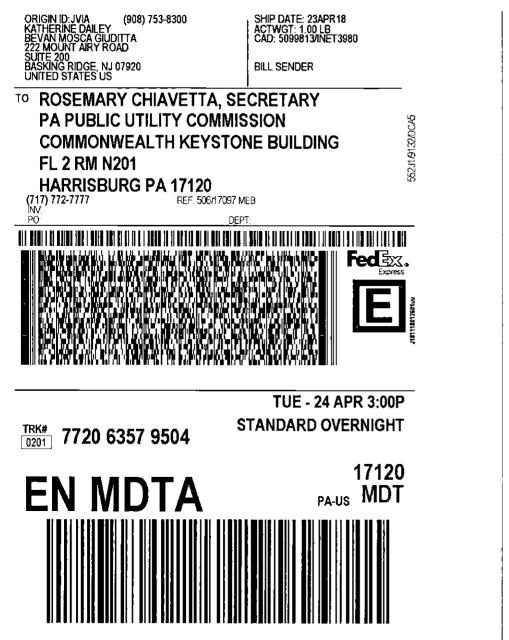
Signature of official administering oath

My commission expires

NAFTALI MOSKOVITS Notary Public, State of New York No. 01MO6133814 Qualified in Kings County Commission Expires 09/19/2021

RY

APR 23 2018



After printing this label:

Use the 'Print' button on this page to print your label to your laser or inkjet printer. Fold the printed page along the horizontal line. -No

Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number. Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

https://www.fedex.com/shipping/shipAction.handle?method=doContinue