

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Integrity Energy, TD, d/b/a Integrity Energy, for approval to offer, render, furnish, or supply natural gas supply services as a(n) Broker / Marketer 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:

**Integrity Communications of Ohio LLC D.B.A. Integrity Energy**  
5711 Grant Ave  
Cleveland Ohio 44105  
[www.integenergy.com](http://www.integenergy.com)  
216-502-4410

- 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.

**Anthony DiSanto**  
Esquire Assit, LTD / AA Agent Services LLC  
300 N 2<sup>nd</sup> st., Suite 630  
Harrisburg, PA 17101

Phone: 717-232-9398  
Fax: 717-232-6248

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- 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.

**Paul Nero**  
CEO  
5711 Grant Ave  
Cleveland Ohio 44105

Phone: 216-502-4410  
Fax: 216-441-2401  
[pnero@integenergy.com](mailto:pnero@integenergy.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.

**No Attorney**

- 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 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.

**Paul Nero**  
**CEO**  
**5711 Grant Ave**  
**Cleveland Ohio 44105**

**Phone: 216-502-4410**  
**Fax: 216-441-2401**  
[pnero@integenergy.com](mailto:pnero@integenergy.com)

**Mike Naughton**  
**President**  
**5711 Grant Ave**  
**Cleveland Ohio 44105**

**Phone: 216-502-4409**  
**Fax: 216-502-4409**  
[mnaughton@integenergy.com](mailto:mnaughton@integenergy.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")

**Integrity Energy**

Provide a copy of the Applicant's filing with Pennsylvania's Department of State Pursuant to 54 Pa. C.S. §311.

**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.

**See Attachment A1, A2, & A3**

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

**State of incorporation is Ohio**

**See attachment B1 certificate of good standing and registration Number from the state of Ohio.**

- Give name and address of officers.

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### 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.

**No Affiliates**

- 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.

**No Predecessors**

#### 4. OPERATIONS

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)

or

- The Applicant is not presently doing business in Pennsylvania.

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.

**Integrity Energy is submitting this application to become a licensed natural gas broker in the state of Pennsylvania. We will be contacting customers to provide consulting, supply, planning, and management services to specific customers. Our customers will have the opportunity to select a supplier based on the competitive proposals we submit.**

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

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Columbia                     | <input checked="" type="checkbox"/> Philadelphia Gas Works |
| <input checked="" type="checkbox"/> National Fuel Gas            | <input checked="" type="checkbox"/> UGI Central Penn       |
| <input checked="" type="checkbox"/> PECO                         | <input checked="" type="checkbox"/> UGI Penn natural       |
| <input checked="" type="checkbox"/> Peoples Gas – Equitable Div. | <input checked="" type="checkbox"/> UGI Utilities          |
| <input checked="" type="checkbox"/> Peoples Natural Gas          | <input checked="" type="checkbox"/> Valley Energy          |
| <input checked="" type="checkbox"/> Peoples Gas Company          | <input checked="" type="checkbox"/> All of the above       |

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

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)
- Residential and Small Commercial as Mixed Meter ONLY (**CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE**)
- Large Commercial Customers - (6,000 Mcf or more annually)
- Industrial Customers
- Governmental Customers
- All of above (Except Mixed Meter)
- Other (Describe):

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

**Upon acceptance of this application**

## 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.

**None**

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.

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

- 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. **Applicant should also include if it had a Pennsylvania PUC EGS or NGS license previously cancelled by the Commission.** If the Applicant has no actions or complaints to list, explicitly state such.

**None**

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

## 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:

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

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

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

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

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

b.) **NGDCs:** 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 Natural Gas 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 NGDC is as follows.

<p><b>Columbia Gas of PA, Inc.</b>          Michele Caddell          290 W. Nationwide Blvd.          Columbus, OH 43215          PH: 614.460.6841          FAX: 614.460.8447          e-mail: <a href="mailto:mcaddell@nisource.com">mcaddell@nisource.com</a></p>	
<p><b>Peoples Natural Gas – Equitable Division</b>          Lynda Petrichevich          375 North Shore Drive          Pittsburgh, PA 15212          PH: 412.208.6528          FAX: 412.208.6577          e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>National Fuel Gas Distribution Corp.</b>          David D. Wolford          6363 Main Street          Williamsville, NY 14221          PH: 716.857.7483          FAX: 716.857.7479          e-mail: <a href="mailto:wolfordd@natfuel.com">wolfordd@natfuel.com</a></p>
<p><b>The Peoples Natural Gas Company</b>          Lynda Petrichevich          375 North Shore Drive          Pittsburgh, PA 15212          PH: 412.208.6528          FAX: 412.208.6577          e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>PECO</b>          Carlos Thillet, Manager, Gas Supply and Transportation          2301 Market Street, S9-2          Philadelphia, PA 19103          PH: 215.841.6452          Email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a></p>
<p><b>Peoples Gas Company</b>          Lynda Petrichevich          375 North Shore Drive          Pittsburgh, PA 15212          PH: 412.208.6528          FAX: 412.208.6577          e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>Philadelphia Gas Works</b>          Nicholas LaPergola          800 West Montgomery Avenue          Philadelphia, PA 19122          PH: 215.684.6278          email: <a href="mailto:nicholas.lapergola@pgworks.com">nicholas.lapergola@pgworks.com</a></p>
<p><b>UGI Central Penn</b>          David Lahoff          2525 N. 12<sup>th</sup> Street, Suite 360          Reading, PA 19612-2677          PH: 610.796.3520          Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>	<p><b>UGI</b>          David Lahoff          2525 N. 12<sup>th</sup> Street, Suite 360          Reading, PA 19612-2677          PH: 610.796.3520          Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>
<p><b>Valley Energy Inc.</b>          Ed Rogers          523 South Keystone Avenue</p>	<p><b>UGI Penn Natural</b>          David Lahoff          2525 N. 12<sup>th</sup> Street, Suite 360</p>



Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: <a href="mailto:erogers@ctenterprises.org">erogers@ctenterprises.org</a>	Reading, PA 19612-2677 PH: 610.796.3520 Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a>
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**7. FINANCIAL FITNESS**

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require.

**See Attachments C1 – C7**

- 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.

**Integrity Energy is an Ohio LTD that does not have a Parent company, any affiliations, or subsidiary companies.**

- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)

**Not Available**

- Applicant's accounting statements, including balance sheet and income statements for the past two years.

**Confidential Documents - See Attachments D1 – D4**

- 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.

**No credit reports are available**

- 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.

**Business Liability Insurance through Westfield with a general aggregate of 2 million in coverage.**

- Audited financial statements exhibiting accounts over a minimum two year period.

- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

**Confidential Documents – See attachments E1 ( 19 pages stapled together) & E2 (12 Pages stapled together)**

- 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.

**Integrity Energy is only operating as a Broker/Marketer**

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

**Integrity Energy's fee will be paid directly from the supplier after they collect from the customer.**

- 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.

**Jeremy Bok**

CPA, CFP®, PFS, CPFA, AIF®

President - Wealth Advisor

**Saorsa Wealth Management, LLC**

24500 Center Ridge Road, Suite 265

Westlake, OH 44145

**(P) 440.201.4590 x101**

(F) 440.201.2270

[www.SaorsaWM.com](http://www.SaorsaWM.com)

- 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.

**Integrity Energy currently sells natural gas in the state of Ohio**

- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.

**See Attachment F1, Licensed Ohio competitive natural gas aggregator/broker certificate.**

- Type of customers and number of customers Applicant currently serves in other jurisdictions.

**Small, medium, and large commercial customers, approximately 400 customers.**

- Staffing structure and numbers as well as employee training commitments.

**Our office is combined with sales, managers, back office, and processing individuals. All contracts and custom pricing are generated from a non-sales person to ensure accuracy with every contract. All individuals go through initial training before performing their duties.**

- Business plans for operations within the Commonwealth.

**Continue current model we use for selling electricity in the states we are licensed as well as selling gas in Ohio**

- Any other information appropriate to ensure the technical capabilities of the Applicant.

**Integrity Energy is a licensed electric broker/aggregator in multiple states, including Ohio, Pennsylvania, Illinois, Maryland, Texas, Rhode Island, Massachusetts, and Connecticut.**

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**
- Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
- External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or non-selling marketer**
- 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.

1. Integrity does not allow any sales agents to submit contracts to the supplier. All contracts need to get processed by a non-sales person who validate every contract.
2. Integrity contacts every customer by phone or email within days of the contract being signed to first welcome the customer as an Integrity customer and also verifies all pricing, term length, and start date information.
3. Integrity sends monthly/quarterly newsletters to all customers keeping them up to date with current market conditions and has all contact information on every email.
4. Integrity sends monthly email reminders to all customers who have future start contracts to remind customers that they have already locked in a rate to start when their existing contract ends.
5. Integrity has customers sign an acknowledgement form if we notice a supplier is currently on their bill. This acknowledgement form makes the customer aware that we noticed a supplier is on their bill and to make sure they have met their obligation with their current supplier.

- 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.

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CEO  
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[mnaughton@integenergy.com](mailto:mnaughton@integenergy.com)

See attachments G1 – G5 for resumes

## 9. DISCLOSURE STATEMENT:

*(Not applicable for an applicant applying for a license exclusively as a broker/marketer.)*

**DISCLOSURE STATEMENTS:** If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas 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.

**N/A – Integrity Energy is applying exclusively as a broker/marketer**

## 10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **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 § 62.114.

AGREED

b. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission:

- Reports of Gross Receipts: Applicant shall file an annual report with the Commission on an annual basis no later than April 30<sup>th</sup> following the end of the calendar year per 52 Pa. Code § 62.110.

AGREED

c. **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. § 2208(d). Transferee will be required to file the appropriate licensing application.

AGREED

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

ACKNOWLEDGED

e. **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 § 62.105.

AGREED

f. **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

g. **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 thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.

AGREED

**h. 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

**i. 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**  
(All 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 Public Utility Code of Pennsylvania and applicable federal and state laws. 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 NGDC. For example, an applicant that wants to operate in Peoples – Equitable 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.

**See attachments H1 – H7 for Proof of Publication letters**

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Columbia Gas	X	X		X		X	X
National Fuel Gas				X			
PECO			X				
Peoples - Equitable	X			X			
Peoples Natural Gas	X			X			X
Peoples Gas Company				X			
Philadelphia Gas Works			X				
UGI		X	X		X		
UGI Central Penn	X	X	X	X	X	X	X
UGI Penn Natural		X			X	X	
Valley Energy					X	X	
Entire Commonwealth	X	X	X	X	X	X	X

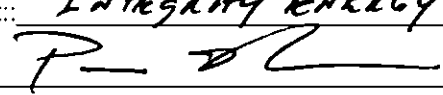
(Example Publications are provided at Appendices F and G)

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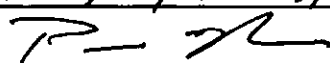
**13. SIGNATURE**

Applicant: Integrity Energy - Paul NERO  
 By:   
 Title: CEO



### 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 is complete.

Applicant: Integrity Energy - PAUL NERO  


		<b>Signature</b>	
Applicant's Use	✓	<b>Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)</b>	
	✓	<b>Application Affidavit</b>	
	✓	<b>Operations Affidavit</b>	
	✓	<b>Proof of Publication</b>	
	✓	<b>Tax Certification Statement</b>	
		<b>Commonwealth Department of State Verification</b>	
		<b>Certificate of Service</b>	

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

[Commonwealth/State] of OHIO :

ss.

County of CUYAHOGA :

PAUL NERO, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the CEO (Office of Affiant) of Integrity Energy (Name of Applicant);]

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

That the Applicant herein PAUL NERO has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

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

That the Applicant herein PAUL NERO 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 PAUL NERO 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 14 day of June, 2018.



Signature of official administering oath

My commission expires \_\_\_\_\_  
ANDREW C. WILLIS, Notary Public  
In and for the State of Ohio  
My Commission Expires Nov. 15, 2020

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

OPERATIONS AFFIDAVIT

[Commonwealth/State] of OHIO :

: ss.

County of CUYAHOGA :

PAUL NERO, Affiant, being duly [sworn/affirmed] according to law,  
deposes and says that:

[He/she is the CEO (Office of Affiant) of Integrity Energy  
(Name of Applicant);]

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

That Paul Nero, 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 Paul Nero, the Applicant herein, asserts that [he/she/it] possesses the requisite 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.

That TR, 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 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)**

That Paul Nervo, 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.

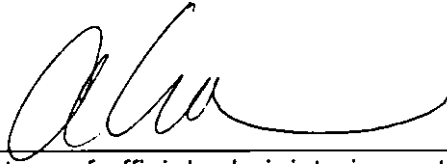
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the 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 14 day of June, 2018.



\_\_\_\_\_  
Signature of official administering oath

My commission expires \_\_\_\_\_

ANDREW C. WILLIS, Notary Public  
In and for the State of Ohio  
Commission Expires Nov. 15, 2020

**Appendix C**

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

JUN 18 2018

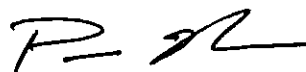
RECEIVED

**Example  
CERTIFICATE OF SERVICE**

On this the 14<sup>th</sup> day of JUNE 2018, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas 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:

<p><b>Office of Consumer Advocate</b> 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120</p>	<p><b>Office of the Attorney General</b> Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120</p>
<p><b>Office of the Small Business Advocate</b> Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101</p>	<p><b>Commonwealth of Pennsylvania</b> Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946</p>
<p><b>Columbia Gas of PA, Inc.</b> Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: <a href="mailto:mcaddell@nisource.com">mcaddell@nisource.com</a></p>	<p><b>Bureau of Investigation &amp; Enforcement</b> <b>Pennsylvania Public Utility Commission</b> Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120</p>
<p><b>Peoples Natural Gas – Equitable Division</b> Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>National Fuel Gas Distribution Corp.</b> David D. Wolford 6363 Main Street Williamsville, NY 14221 PH: 716.857.7483 FAX: 716.857.7479 e-mail: <a href="mailto:wolfordd@natfuel.com">wolfordd@natfuel.com</a></p>
<p><b>The Peoples Natural Gas Company</b> Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>PECO</b> Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a></p>
<p><b>Peoples Gas Company</b> Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>Philadelphia Gas Works</b> Nicholas LaPergola 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.684.6278 email: <a href="mailto:nicholas.lapergola@pgworks.com">nicholas.lapergola@pgworks.com</a></p>

<p><b>UGI Central Penn</b>  David Lahoff  2525 N. 12<sup>th</sup> Street, Suite 360  Reading, PA 19612-2677  PH: 610.796.3520  Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>	<p><b>UGI</b>  David Lahoff  2525 N. 12<sup>th</sup> Street, Suite 360  Reading, PA 19612-2677  PH: 610.796.3520  Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>
<p><b>Valley Energy Inc.</b>  Ed Rogers  523 South Keystone Avenue  Sayre, PA 18840-0340  PH: 570.888-9664  FAX: 570.888.6199  email: <a href="mailto:erogers@centerprises.org">erogers@centerprises.org</a></p>	<p><b>UGI Penn Natural</b>  David Lahoff  2525 N. 12<sup>th</sup> Street, Suite 360  Reading, PA 19612-2677  PH: 610.796.3520  Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>




---

Paul Nero, CEO Integrity Energy

**Appendix F**  
**EXAMPLE FORM OF NOTICE FOR NGS ONLY**

**PENNSYLVANIA**  
**PUBLIC UTILITY COMMISSION**  
**NOTICE**

*Application of **Integrity Communications of Ohio LTD** (d/b/a "**Integrity Energy**") For Approval To Offer, Render, or Furnish Natural Gas Services as a **Marketer/Broker** Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.*

**Integrity Energy** will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. **Integrity Energy** proposes to sell natural gas and related services in the entire state of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Integrity Energy** 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 **Integrity Energy's** attorney at the address listed below.

By and through Counsel: Anthony DiSanto

**Esquire Assit, LTD**

300 N 2<sup>nd</sup> st., Suite 630

Harrisburg, PA 17101

717-232-9398

717-232-6248

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

## Appendix H

### Electronic Data Interchange and Internet Requirements

Any NGS suppliers and/or broker/marketers that wish to use the Electronic Data Interchange (EDI), in the NGDCs where its available, must meet the EDI certification requirements of the NGDC. Certification is a testing process using the Commission approved Internet protocol. To initiate this process, the NGS is encouraged to contact the NGDC as early as possible after filing an application for a license with the Commission, since certification may require as many as four months to complete and customer service contract dates may not commence prior to certification. NGDC requirements of new suppliers may be found on the respective NGDC home web page. Pennsylvania's industry stakeholder group the Electronic Data Exchange Working Group (EDEWG) develops and maintains the EDI transactions and related business practices, which are found on the Pa. PUC website at [http://www.puc.pa.gov/filing\\_resources/issues\\_laws\\_regulations/electronic\\_data\\_exchange.aspx](http://www.puc.pa.gov/filing_resources/issues_laws_regulations/electronic_data_exchange.aspx). The EDEWG meets telephonically the first Thursday of each month at 2:00pm ET to discuss EDI change control requests and other issues.

To keep current with Pennsylvania EDI practices and policies, a newly licensed NGS may choose to participate in the EDEWG by contacting the following:

#### PA EDEWG EDI Contacts

Entity Name	Contact Name	Telephone	Email	Preference
PA PUC	Jeff McCracken	717-783-6163	<a href="mailto:jmccracken@pa.gov">jmccracken@pa.gov</a>	Email
PA PUC	Lee Yalcin	717-787-6723	<a href="mailto:lyalcin@pa.gov">lyalcin@pa.gov</a>	Email
PA EDEWG LDC Co-Chair	Ernie Mathie	330-384-5757	<a href="mailto:mathiee@firstenergycorp.com">mathiee@firstenergycorp.com</a>	Email
PA EDEWG ESP Co-Chair	Christine Hughey	713-963-3640	<a href="mailto:chughey@sperianenergy.com">chughey@sperianenergy.com</a>	Email
PA EDEWG Secretary & Regional EDI Change Control Manager	Brandon Siegel	412-817-8004	<a href="mailto:brandon.siegel@intelometry.com">brandon.siegel@intelometry.com</a>	Email

#### PA NGDC EDI Contacts

Company Name	Contact Name	Telephone	Email	Preference
PGW	PGW Gas Choice		<a href="mailto:pgwchoicemarketing@pgworks.com">pgwchoicemarketing@pgworks.com</a>	Email
UGI Utilities Inc.	EDI Technical Support		<a href="mailto:edi@uqi.com">edi@uqi.com</a>	Email
UGI Utilities Inc.	David Lahoff	610-796-3520	<a href="mailto:dlahoff@uqi.com">dlahoff@uqi.com</a>	email

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



A1

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
CORPORATION BUREAU  
401 NORTH STREET, ROOM 206  
P.O. BOX 8722  
HARRISBURG, PA 17105-8722  
WWW.CORPORATIONS.STATE.PA.US/CORP

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Integrity Communications of Ohio Ltd.

THE CORPORATION BUREAU IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE CORPORATION BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE CORPORATION BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT WWW.CORPORATIONS.STATE.PA.US/CORP OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 3918322

Naughton, Michael  
5711 Grant Ave  
Cleveland, OH 44105

A2

ST, PAO4B

From: pao4b@state.pa.us  
Sent: Wednesday, November 18, 2009 4:54 PM  
To: ST, PAO4B  
Subject: PAO4B New Registration 274463

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PENNSYLVANIA DEPARTMENT OF STATE  
CORPORATION BUREAU  
Application For Registration - Foreign

- > Registered Limited Liability General Partnership (§ 8211)
- Registered Limited Liability Limited Partnership (§ 8211)
- Limited Partnership (§ 8582)
- Limited Liability Company (§ 8981)

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

Name  
Michael Naughton  
Address  
5711 Grant Ave  
Address

Commonwealth of Pennsylvania  
APPLICATION FOR REGISTRATION 2 Page(s)

City State Zip  
Cleveland OH 44105



T0932347102

Email: mnaughton@integrity-communications.com

Fee: \$250

In compliance with the requirements of the applicable provisions (relating to registration), the undersigned, desiring to register to do business in this Commonwealth, hereby states that:

1. The name to be registered is:  
Integrity Communications, Ltd.
2. (If the name set forth in paragraph 1 is not available for use in this Commonwealth, complete the following):  
The name under which the limited liability company/limited liability partnership/limited partnership proposes to register and do business in this Commonwealth is: Integrity Communications of Ohio Ltd.
3. The name of the jurisdiction under the laws of which it was organized and the date of its formation:  
Jurisdiction: OH Date of Formation: 12/12/2002
4. The (a) address of this initial registered office in this Commonwealth or (b) name of its commercial registered office ; and the county of venue is:  
(a) Number and Street City State Zip County  
(b) Name of Commercial Registered Office Provider County  
AAAgents Services, LLC Dauphin

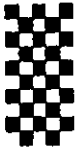
5. Check and complete one of the following:  
The address of the office required to be maintained by it in the jurisdiction of its organization by the laws of that Jurisdiction is:

5711 Grant Ave Cleveland OH 44105  
Number and Street City State Zip

CO \$250

It is not required by the laws of its jurisdiction of organization to maintain an office therein and the address of its principal office is:

Number and Street City State Zip



A3

PENNSYLVANIA DEPARTMENT OF STATE  
CORPORATION BUREAU  
Foreign Signature Form

Document must be completed and mailed to the address listed below.

Department of State  
Corporation Bureau  
P.O. Box 8722  
Harrisburg, PA 17105-8722  
(717) 787-1067

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

1. The enterprise structure is:  
Limited Liability Company


2. The enterprise legal name is:

Integrity Communications, Ltd.

3. The enterprise's fictitious name is:

Integrity Communications of Ohio Ltd.

IN TESTIMONY WHEREOF, the undersigned have caused this application to be executed this  
18<sup>th</sup> day of November, 2009

  
\_\_\_\_\_  
Signature of Michael Naughton  
President  
\_\_\_\_\_  
Title

0446320091118

To avoid any delay or rejection, signature form(s) should be received within 7-10 days  
of the registration submission date.

United States of America  
State of Ohio  
Office of the Secretary of State

*I, Jennifer Brunner, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show INTEGRITY ENERGY, LTD., an Ohio For Profit Limited Liability Company, Registration Number 1923765, was organized within the State of Ohio on March 19, 2010, is currently in FULL FORCE AND EFFECT upon the records of this office.*

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



*Witness my hand and the seal of the  
Secretary of State at Columbus, Ohio  
this 12th day of May, A.D. 2010*

A handwritten signature in cursive script, appearing to read "Jennifer Brunner".

Ohio Secretary of State



An Exelon Company

June 5, 2018

Integrity Energy  
5711 Grant Avenue  
Cleveland, Ohio 44105

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: Broker Requirements

Dear Integrity Energy:

PECO is aware that Integrity Energy 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, Integrity Energy could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Integrity Energy 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 Integrity Energy 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 Integrity Energy or the creditworthiness requirement for PECO's exposure to Integrity Energy changes in the future, PECO reserves the right to require Integrity Energy to provide a bond or other financial security instrument.

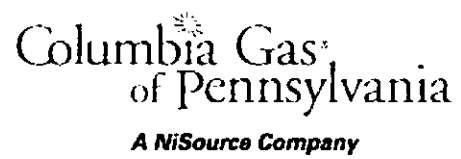
If you should have any questions regarding this matter, please contact Chris Sauerbaum at 215-841-6422 or myself at 215-841-6452.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carlos P. Thillet".

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

C2



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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

May 23, 2018

Paul Nero  
Integrity Communications of Ohio, LTD  
5711 Grant Ave  
Cleveland, OH 44105

Dear Paul Nero:

We are pleased that Integrity Communications of Ohio, LTD 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, Integrity Communications of Ohio, LTD 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. Integrity Communications of Ohio, LTD has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Integrity Communications of Ohio, LTD 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 Integrity Communications of Ohio, LTD changes in the future, Columbia Gas might deem it appropriate to require Integrity Communications of Ohio, LTD 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

**Paul Nero**

**From:** Beverly Hogan <HoganB@natfuel.com>  
**Sent:** Friday, May 25, 2018 10:05 AM  
**To:** Paul Nero  
**Subject:** Broker Bonding requirements - Integrity Energy

**RECEIVED**

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Paul,

This email is in response to your email to Dave Wolford of National Fuel Gas Distribution Corporation ("National Fuel") regarding a bonding letter for Integrity Energy.

National Fuel's requirements regarding the issuance of a bonding letter are that once we receive a draft copy of the proposed application that is going to be filed or a copy of the application that has been filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission"), a bonding letter will be provided to you promptly via email and/or postal service to submit to the Commission. We are interested in at least the first 14 pages of this application, which can be emailed to me and/or Dave Wolford. It is not necessary to send financial information at this time.

Upon discussion with the PUC, it is our understanding that the bonding letters (Section 7), as well as the proof of publications (Section 12), can be submitted at a later date than when the original application is submitted.

If you have additional questions, please call me at 716/857-7950.

Thank you,

Bev Hogan  
 National Fuel Gas Distribution Corporation Transportation Services Help Desk  
 (716) 857-7232 Fax (716) 857-7479  
 Email: tsssupport@natfuel.com

From: Paul Nero [mailto:PNero@integenergy.com]  
 Sent: Wednesday, May 23, 2018 10:14 AM  
 To: Paul Nero <PNero@integenergy.com>  
 Cc: mcaddell@nisource.com; lynda.w.petrivich@peoples-gas.com; Dave Wolford <WolfordD@natfuel.com>; carlos.thillet@exeloncorp.com; nicholas.lapergola@pgworks.com; dlahoff@ugi.com; erogers@ctenterprises.org  
 Subject: Bonding requirements

\*\*\*\*\* THIS IS AN EXTERNAL EMAIL, DO NOT OPEN LINKS OR ATTACHMENTS UNLESS YOU TRUST THE SENDER \*\*\*\*\*

Attention NGDC's,

I am in the process of submitting an application to become a licensed gas broker in the state of Pennsylvania.

One of the requirements is to submit a request to all NGDC's to ask what the bonding requirement is for each.

Can you please respond with the bonding requirement that is required.

C4



# VALLEY ENERGY

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

May 23, 2018

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**VIA EMAIL**

Mr. Paul Nero  
Integrity Energy  
5711 Grant Ave.  
Cleveland, OH 44105

Dear Mr. Nero:

We understand that Integrity Energy 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 Integrity Energy intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Integrity Energy 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 Integrity Energy as deemed appropriate.

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

Sincerely,

Edward E. Rogers  
President & CEO

EER/ss

cc: J. Levering, Valley Energy





375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](http://www.peoples-gas.com)

C5

**Carol Scanlon**  
Manager, Rates & Regulation

**Peoples Service Company LLC**  
Phone: 412-208-6931  
Email: [Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com)

May 23, 2018

**Paul Nero**  
CEO  
Integrity Communications of Ohio, LTD d/b/a Integrity Energy  
5711 Grant Avenue  
Cleveland, Ohio 44105

Dear Mr. Nero:

We are pleased that Integrity Communications of Ohio, LTD d/b/a Integrity Energy 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 Integrity Communications of Ohio, LTD d/b/a Integrity Energy is not currently serving customers on the Peoples systems, we have determined at this time that Integrity Communications of Ohio, LTD d/b/a Integrity Energy 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 Integrity Communications of Ohio, LTD d/b/a Integrity Energy 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 412-208-6931 or by email at [Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com).

Sincerely,

**Carol Scanlon**  
Manager, Rates and Regulation  
Peoples Natural Gas Company LLC

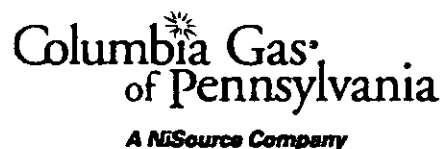
Cc: **Stephen Kelly**  
**Mina Speicher**

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

C 6



May 23, 2018

Paul Nero  
Integrity Communications of Ohio, LTD  
5711 Grant Ave  
Cleveland, OH 44105

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Paul Nero:

We are pleased that Integrity Communications of Ohio, LTD 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, Integrity Communications of Ohio, LTD 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. Integrity Communications of Ohio, LTD has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Integrity Communications of Ohio, LTD 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 Integrity Communications of Ohio, LTD changes in the future, Columbia Gas might deem it appropriate to require Integrity Communications of Ohio, LTD 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,

A handwritten signature in cursive script that reads "Patricia Chang".

Patricia Chang  
Manager of Choice and Transportation Support Services

C7



UGI Utilities, Inc.  
2525 North 12<sup>th</sup> Street  
Suite 360  
Post Office Box 12677

May 30, 2018

Paul Nero  
CEO  
Integrity Energy  
5711 Grant Ave  
Cleveland Ohio 44105

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

RE: Integrity Energy application to serve as a Natural Gas Broker

Dear Mr. Nero,

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

F1

**The Public Utilities Commission of Ohio**  
**Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate**  
**Renewal**

Issued pursuant to Case Number(s):  
**15-0874-GA-AGG**

is  
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:  
**15-444G (2)**

Granted to:  
**Integrity Energy, LTD**

Whose office or principal place of business is located at:  
**5711 Grant Avenue Cleveland, OH 44105**

And is hereby certified to provide:  
**Retail Natural Gas Broker Services**  
within the state of Ohio, for a two-year period.

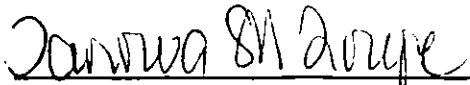
Certification Effective:  
**June 4, 2017 through June 4, 2019**

The certification of Ohio competitive retail natural gas aggregators/brokers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio  
Dated: **June 5, 2017**

By Order of  
The Public Utilities Commission of Ohio  
  
Barcy F. McNeal, Secretary  
Tanowa M. Troupe, Acting Secretary  
Felecia D. Burdett, Acting Secretary

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

JUN 18 2018

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RECEIVED

61

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Michael Naughton**

5711 Grant Ave. Cleveland, OH 44105 P: 216-502-4409  
email:mnaughton@integrity-communications.com

### Experience

**Integrity Communications, Ltd.** Outbound Contact Center Specializing in Telecom and Energy Services  
Cleveland, OH

President/Co owner, Co Founder: May 2002 - Present

- Lead a start up direct sales organization from infancy to a multi dimensional leading contact center with multiple inbound and outbound sales campaigns in a variety of different industries.
- Either led or oversaw every facet in the organization at some duration within the life of the company. These included sales, training, sales management, back office support, customer care, P&L responsibility, marketing, strategy, IT management, and vendor relationships.
- Assisted in launching our first sales office in Cleveland, OH, where the focus was AT&T sales in a direct sales environment. Within one year, launched a second direct sales office in the Novi, MI to focus on the Detroit Metro market. Became a Top 5 AT&T Distributor in 2004 with the two direct sales offices.
- Facilitated the first TPV sales relationship with the AT&T indirect sales channel, which accelerated the growth of Integrity into a two time Inc 500 winner in 2007 and 2008 as one of the fastest growing companies in the United States.
- Converted the entire organization from a 40 person direct sales channel into a leading outbound telesales call center with over 100 employees in 2005.
- Achieved the honor of becoming the largest producing AT&T Distributor in the ATT indirect sales channel in the over 20 year history of the channel in 2005.
- Continuously achieved the number one ranking of AT&T Distributor throughout the country in the AT&T indirect sales channel in 2006, 2007, 2008, and 2009.
- The company was recognized as a two time INC. 500 winner as one of the fastest growing companies in the United States in 2005 and 2006.
- In 2007, created what is believed to be the first call center to adopt and successfully sell high end IP and data products for the AT&T Indirect Channel. Previously, this product was sold in a traditional face to face sales model.
- In June 2008, initiated and implemented our first relationship with a leading Retail Energy Provider, becoming their number one outsourced telesales vendor by month 3 of the campaign. We are still their number one and only small commercial telesales vendor.
- Assisted in the growth in our energy campaigns throughout 2009 by bringing on another leading Retail Energy Provider for our telesales campaigns. With this particular relationship, Integrity ventured into our first dedicated residential telesales campaign. We have managed to consistently achieve 1.0 SPH (Sales per Hour) in this campaign.
- Oversaw the launch of our dedicated energy broker campaign, where we represent multiple Retail Energy Providers in the Commercial and Industrial
- I have assisted in overseeing our management team from zero to a Director, four daytime managers, and two night time managers over this growth period.

**Allegiance Telecom, Inc.** Voice and Data Services Provider

Sales Manager: May 2001-April 2002

Cleveland, OH

- Hire, train, inspire, and motivate a staff of 10 Account Executives in all assigned duties to obtain a monthly team quota of \$25,000 in new monthly revenue
- Developed and implemented a training program for my team of Account Executives on a weekly basis to maintain sales quota achievement
- Consistently achieved weekly/monthly sales forecasts while reporting to the City and Regional Vice President

Major Account Manager: September 2000-April 2001

Cleveland, OH

- Responsible for selling voice and data services to small and medium sized businesses in the Greater Cleveland area via aggressive cold calling, telemarketing, and closing talents
- Maintained a high level of customer service and support by working in conjunction with my engineering and provisioning departments
- Prospected an average of 100 companies per day while running an average of 10 appointments per week by utilizing excellent time management and organizational skills.
- Achieved 126% of plan over an 8 month period.
- Consistently ranked in the top 50 sales representatives out of roughly 1100 nationwide.
- Promoted to a Major Account Manager after a 6 month period.
- Recognized as the Account Executive of the Month 4 times within an 8 month period.
- Promoted to Sales Manager in May 2001

**Bobcat of Cleveland:** Bobcat Equipment Dealership

Cleveland, OH

Account Executive: July 1998-August 2000

- Promoted sales and rental of Bobcat Equipment via cold calling, client demos, referrals, networking, and the commitment to ensure customer satisfaction for the East Side Cleveland territory.
- Managed all facets of the sales including prospecting, demonstrations, financing, collections, product instruction, and warranty coverage.
- Recognized for the top 15% in new sales volume among all Account Executives in North America.
- Increased market share from 27% to 43% for the East Side Cleveland territory.

### Education

**The Ohio State University, Columbus, OH**

September 1993-June 1997

Bachelor of Science in Business Administration, Major: Finance

References available upon request

RECEIVED  
JUN 18 2018  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Paul Nero**  
5711 Grant Ave  
Cleveland Ohio 44105

**RECEIVED**

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

## **Experience**

**2008 – Present      CEO, Integrity Communications, Cleveland Ohio**

**As our success continued as an AT&T authorized distributor we decided to branch out into the energy industry. We have been the largest NMR (New Monthly Revenue) producer for AT&T for the past 3 years and wanted to duplicate our model. In June 2008 we signed a contract with a top 5 alternative supplier. We started to sell natural gas and electricity services to the small and medium size commercial customers. Today over 50% of our annual revenue comes from energy sales. We have been selling energy for almost 2 years and look forward to expanding our business into the commercial and industrial sectors. Our duties include but are not limited to the below:**

- **Design, develop, and implement new training and sales material for an inside account executive to sell energy over the phone.**
- **Recruit and hire established energy experts in the market today.**
- **Develop a back office support system that would be able to support our sales staff as well as all customer service calls.**
- **Interface all sales systems to extract the correct data from our new vendor.**
- **Develop a new scripting tool to accommodate the variety of products offered in the energy industry.**
- **Manage new relationships with the vendor executives to ensure accurate data posting's to reduce churn.**
- **Currently we are marketing directly for 2 major alternative suppliers and have launched our broker division in one utility service area.**
- **At the end of 2008 Integrity had become one of the fastest growing companies in America and received recognition from Inc. 500**

**2005 – 2008      Vice President, Integrity Communications, Cleveland Ohio**

**As Integrity Communications grew so did our responsibilities. At this point we had petitioned AT&T to bring us "Third Party Verification" to enroll our customers in the "Winback" program via phone instead of paper contracts. A winback customer was someone who left the AT&T network for another provider and we had the ability to bring them back. Once TPV was enabled we were able to focus our sales**

efforts through a telesales model. Our duties included but are not limited to the following:

- Hire a staff of inside sales employees that would be able to sell our products over the phone.
- Design, develop, and implement new training and sales material for an inside account executive.
- Create code of conduct procedures that would encompass all telemarketing best practices and policies.
- Develop a back office support system that would be able to support our sales staff as well as all customer service calls.
- Interface all sales systems within the AT&T order entry system.
- Draft strategic sales targets that would coincide with AT&T's footprint.
- Cultivate existing employees to become part of a winning management team.
- Install a predictive dialer system that would improve productivity while increasing quality assurance and quality control.
- At the end of 2008 Integrity had become the largest distributor that AT&T had ever had in the indirect channel.
- Integrity Communications had over 6 million in annual revenue at the end of 2008 and had contracted over 30 million in life cycle revenue for AT&T.

**2002 – 2005 Vice President, Integrity Communications, Cleveland Ohio**

Integrity Communications formed in 2002 as a distributor for AT&T, by myself and a partner, Mike Naughton, with the idea of becoming the largest partner within AT&T's indirect channel. The company started with a single office in Cleveland Ohio and 5 employees, today we own a 36,000 square foot building and have grown to approximately 100 employees. Our duties include but are not limited to the following:

- Develop vendor relationships within AT&T organization.
- Create and develop a strategy to market AT&T products to the end user.
- Design proposal templates and sales training materials.
- Hired initial team of 5 – 10 outside sales account executives to promote and sell AT&T products including voice, data, and long distance.
- Expanded Integrity Communications and started another outside sales office in Novi, Michigan, in 2004. Hired an additional 10-20 sales agents in Michigan to promote, sell, and install AT&T products.
- Became a top 5 distributor with in AT&T's indirect channel.
- At the end of 2004 Integrity had over 1million in annual revenue and had sold over 5 million in life cycle revenue for AT&T.

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



**2000 – 2002 Sales Manager, Allegiance Telecom, Independence Ohio**

**I was hired at Allegiance Telecom as an account executive to manage a portfolio of existing customers and grow revenue. After 6 month's of working the ground floor I was promoted to a senior account executive and shortly after that I was promoted again to sales manager. My duties included but not limited to:**

- **Grow existing relationships of current customers.**
- **Design, build, and implement extensive network diagram's for customers that utilize VPN, WAN, LAN, and multi-link networks.**
- **Recruit, hire, and manage a team of 10 outside sales agents that would drive new business.**
- **Develop relationships with outside network vendors that would be able to promote the Allegiance products to their current customers.**

**Education**

**University of Akron, Akron Ohio**

**RECEIVED**

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Commonwealth of Pennsylvania,) ss  
County of Cumberland)

Victoria Soto 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 05/31/2018

*Victoria Soto*

Principal Clerk of the Publisher

Sworn to and subscribed before me this 1st day of June 2018

*Donna M. Maldonado*  
Notary Public

Commonwealth of Pennsylvania - Notary Seal  
Donna M. Maldonado, Notary Public  
Dauphin County  
My commission expires November 5, 2021  
Commission number 1252842  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE**

**Application of Integrity**

**Communications of Ohio LTD.** (d/b/a "Integrity Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Integrity Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. Integrity Energy proposes to sell natural gas and related services in the entire state of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Integrity Energy 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 Integrity Energy's attorney at the address listed below.

By and through Counsel:  
Anthony DiSanto  
Esquire Assit, LTD  
300 N 2nd st., Suite 630  
Harrisburg, PA 17101  
717-232-9398

717-232-6248

COMMONWEALTH OF PENNSYLVANIA }  
County of Cambria } SS

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE

Application of Integrity Communications of Ohio LTD (d/b/a "Integrity Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

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By and through Counsel: Anthony DiSanto  
Esquire Assit, LTD  
300 N 2nd st., Suite 630  
Harrisburg, PA 17101  
717-232-9398  
717-232-6248

On this 8th day of June A.D. 2018, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Christine Marhefka, who being duly sworn according to law, deposes and says as Sales Manager / Major Accounts of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,

of Cambria, and Commonwealth of Pennsylvania and matter published in said publication in the regular issues on May 31, 2018; and that the Affiant is not interested in all of the allegations as to time, place and character of

*Christine Marhefka*

STATEMENT OF ADVERTISING COSTS

Signed and sworn to before me on  
8th day of June, 2018,  
by Christine Marhefka making the statement.

*Vivian Ohs*

0.00 Lines @ \$2.50 per line	0.00
6.5 Inches @ \$25.00 per inch	162.50
Notary Fee	5.00
Clerical Fee	2.50
<b>Total Cost</b>	<b>170.00</b>

Commonwealth of Pennsylvania - Notary Seal  
Vivian Ohs, Notary Public  
Cambria County  
My commission expires December 6, 2020  
Commission number 1123017  
Member, Pennsylvania Association of Notaries

To The Tribune-Democrat, Johnstown, PA  
For publishing the notice or publication  
attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

\_\_\_\_\_ for publisher of \_\_\_\_\_  
a newspaper of general circulation, hereby acknowledges receipt of the aforesaid  
and publication costs and certifies that the same has been duly paid.

\_\_\_\_\_  
(Name of Newspaper)

By \_\_\_\_\_

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Proof of Publication of Notice in Pittsburgh Post-Gazette**

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

H3

Commonwealth of Pennsylvania, County of Allegheny, ss K. Flaherty, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the \_\_\_\_\_ regular \_\_\_\_\_ editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

**30 of May, 2018**

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

K. Flaherty  
PG Publishing Company

Sworn to and subscribed before me this day of:  
May 30, 2018

Elizabeth R. Chmura

Commonwealth of Pennsylvania - Notary Seal  
Elizabeth R. Chmura, Notary Public  
Allegheny County  
My commission expires February 8, 2022  
Commission number 1326781  
Member, Pennsylvania Association of Notaries

**COPY OF NOTICE OR PUBLICATION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE  
Application of Integrity Energy Communications of Ohio LTD (d/b/a "Integrity Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Integrity Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. Integrity Energy proposes to sell natural gas and related services in the entire state of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Integrity Energy 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 Integrity Energy's attorney at the address listed below.

By and through Counsel, Anthony DiSanto, Esquire Assit, LTD, 300 N 2nd St., Suite 630, Harrisburg, PA 17101, 717-232-9398, 717-232-6248

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

**STATEMENT OF ADVERTISING COSTS**

INTEGRITY ENERGY  
5711 GRANT AVE  
ATTN: PAUL NERO  
CLEVELAND OH 44105-5605

To PG Publishing Company

Total ..... \$418.50

**Publisher's Receipt for Advertising Costs**

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office  
2201 Sweeney Drive  
CLINTON, PA 15026  
Phone 412-263-1338

PG Publishing Company, a Corporation, Publisher of  
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By Samuel J. Arbustine

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

H4

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

INTEGRITY ENERGY  
5711 GRANT AVE  
CLEVELAND OH 44105

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JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Account # 516204  
Order # 82215000  
Ad Price: 251.15

LEGAL NOTICE PENNSYLVANIA

Ann Marie Fortese

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:

05/30/2018

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 Ann Marie Fortese

Sworn and subscribed to before me  
this 30th day of May A.D., 2018

Sharon Venturi

(Notary Public)

Commonwealth of Pennsylvania - Notary Seal  
Sharon Venturi, Notary Public  
Lackawanna County  
My commission expires February 12, 2022  
Commission number 1254228  
Member, Pennsylvania Association of Notaries

LEGAL NOTICE

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION NOTICE

Application of Integrity Communications of Ohio LTD (d/b/a "Integrity Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Integrity Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. Integrity Energy proposes to sell natural gas and related services in the entire state of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Integrity Energy 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 Integrity Energy's attorney at the address listed below.

By and through Counsel:  
Anthony DiSanto  
Esquire Assist, LTD  
300 N. 2nd St., Suite 630  
Harrisburg, PA 17101  
717-232-9398  
717-232-6248

HS

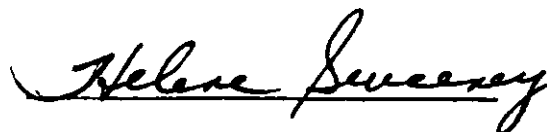
**Proof of Publication in The Philadelphia Daily News  
Under Act. No 587, Approved May 16, 1929**

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:

May 31, 2018

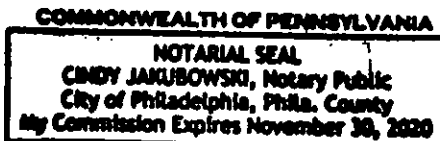
Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to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



Sworn to and subscribed before me this 31st day of May, 2018.

  
Notary Public

My Commission Expires:



Copy of Notice of Publication

**PENNSYLVANIA PUBLIC UTILITY  
COMMISSION NOTICE**

Application of Integrity Communications of Ohio LTD (d/b/a "Integrity Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services To The Public In The Commonwealth Of Pennsylvania. Integrity Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. Integrity Energy proposes to sell natural gas and related services in the entire state of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Integrity Energy 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 Integrity Energy's attorney at the address listed below.

By and through Counsel: Anthony DiSanto  
Esquire Asselt, LTD  
300 N 2nd st., Suite 830  
Harrisburg, PA 17101  
717-232-0398  
717-232-6248

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

H6

PROOF OF PUBLICATON 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 LLC 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:

May 31, 2018

Affiant further deposes that he is an officer daily authorized by the Sun-Gazette LLC, publisher of the Williamsport Sun-Gazette, to verify the foregoing statement under oath and declare 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.

**PENNSYLVANIA  
PUBLIC UTILITY  
COMMISSION  
NOTICE**

Application of Integrity Communications of Ohio LTD (d/b/a "Integrity Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Integrity Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. Integrity Energy proposes to sell natural gas and related services in the entire state of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Integrity Energy 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 Integrity Energy's attorney at the address listed below.

By and through Counsel:  
Anthony DiSanto  
Esquire Assit, LTD  
300 N 2nd st., Suite 630  
Harrisburg, PA 17101  
717-232-9398  
717-232-6248

*Bernard A. Oravec*

SUN-GAZETTE LLC

Sworn to and subscribed before me

The 31<sup>st</sup> day of May 20 18

*Beth A. Miller*  
COMMONWEALTH OF PENNSYLVANIA

Notary Public

NOTARIAL SEAL  
BETH A MILLER  
Notary Public  
CITY OF WILLIAMSPORT, LYCOMING COUNTY  
My Commission Expires Apr 18, 2020

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:

For publishing the notice attached

Hereto on the above state dates.....\$ 227.40

Probated same.....\$

Total.....\$ 227.40

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

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

SUN-GAZETTE LLC

BY Bernard A. Oravec

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

H7

PROOF OF PUBLICATION  
In  
THE ERIE TIMES-NEWS  
COMBINATION EDITION

Integrity Energy  
5711 Grant Ave  
Cleveland OH 44105

REFERENCE: 96051 317513  
PUC Notice

STATE OF PENNSYLVANIA)  
COUNTY OF ERIE ) SS:

Brenda L. Learn, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 06/01/18

TOTAL COST: \$543.00 AD SPACE: 0 Lines

FILED ON: 06/01/18

RECEIVED

JUN 18 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
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**Esquire Assit, LTD**  
300 N 2nd st., Suite 630  
Harrisburg, PA 17101  
717-232-9398  
717-232-624

EP317513

Sworn to and subscribed before me this 1st day of June 2018

Affiant: Brenda L. Learn

NOTARY: Barbara J. Moore

COMMONWEALTH OF PENNSYLVANIA  
NOTARIAL SEAL  
Barbara J. Moore, Notary Public  
City of Erie, Erie County  
My Commission Expires March 23, 2020  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES





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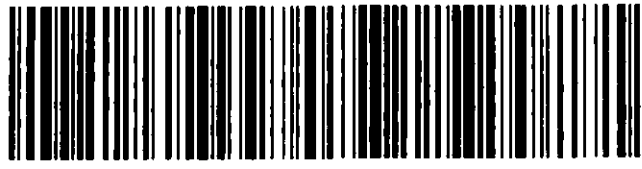
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SIGNATURE REQUIRED

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