



# *Aspen Energy*

The Best Choice for Natural Gas and Electricity

July 12, 2018

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

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Reference: Docket No. A-2018-3002802 Utility Code: 1221047

Dear Ms. Chiavetta,

The enclosed documents complete the corrected information requested for our Natural Gas license.

In addition, this information was emailed to Jeremy Haring at [jharing@pa.gov](mailto:jharing@pa.gov).

Please contact me if any additional documentation is necessary.

Sincerely,

Sandra Jackson  
Administrative Assistant

Enclosure

Docket No. A-2018-3002802  
Aspen Energy Corporation  
Data Requests

1. Reference Application, Section 4.a, Present Operations – Applicant indicated it is not currently doing business in PA. However, we have record of an EGS license being issued at Docket # A-2010-2203946. Please file an updated Application page with the corrected information or an explanation about the status of that license.
2. Reference Application, Section 4.d, Bonding Letters – Applicant failed to provide any of the required bonding letters. Please provide the missing documentation.
3. Reference Application, Section 7.b, Financial Fitness – Applicant did not provide sufficient documentation to demonstrate financial fitness. Please provide financial fitness documentation that may include two consecutive years of income tax filings, three consecutive months of bank statements, etc.
4. Reference Application, Section 7.f, Taxation – Applicant did not provide a Corporate Box Number or a Revenue ID Number on its Tax Certification Statement. Please submit a corrected Tax Certification Statement including either the Corporate Box Number or Revenue ID Number.
5. Reference Application, Section 11, Affidavits – The Affidavits submitted are missing the required notary stamps. These Affidavits are intended to be legally binding documents; therefore, they must be correct in their entirety. Please resubmit the Application Affidavit and the Operations Affidavit with the proper notarization.

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JUL 12 2018

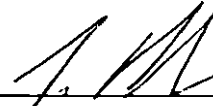
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



# *Aspen Energy*

The Best Choice for Natural Gas and Electricity

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

  
\_\_\_\_\_  
Jonathan Peele

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Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Ohio :

ss.

County of Franklin :

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

[He/she is the President (Office of Affiant) of Aspen Energy Corporation (Name of Applicant);]

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

That the Applicant herein Aspen Energy Corporation has the burden of producing information and supporting

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

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

That the Applicant herein Aspen Energy Corporation 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 Aspen Energy Corporation 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]  
Signature of Affiant

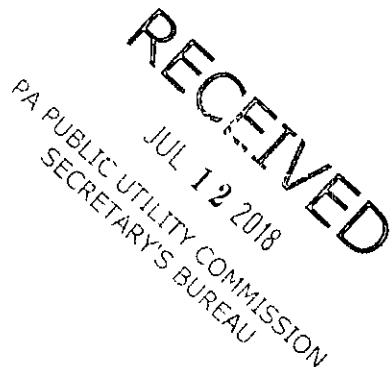
Sworn and subscribed before me this 12 day of July, 2018.

[Signature]  
Signature of official administering oath

My commission expires 2-15-2022.



SANDRA JACKSON  
Notary Public, State of Ohio  
My Commission Expires  
February 15, 2022



Appendix B

OPERATIONS AFFIDAVIT

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

[Commonwealth/State] of Ohio :

: ss.

County of Franklin :

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

[He/she is the President (Office of Affiant) of Aspen Energy Corporation (Name of Applicant);]

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

That Aspen Energy Corporation, 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 Aspen Energy Corporation, 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 Aspen Energy Corporation, 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 Aspen Energy Corporation, 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 12 day of July, 2018.



**SANDRA JACKSON**  
Notary Public, State of Ohio  
My Commission Expires  
February 15, 2022

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

My commission expires 2-15-2022.

**Appendix D (CONFIDENTIAL)**  
**COMMONWEALTH OF PENNSYLVANIA**  
**PUBLIC UTILITY COMMISSION**

**TAX CERTIFICATION STATEMENT**

A completed Tax Certification Statement must accompany all applications for new licenses, renewals or transfers. Failure to provide the requested information and/or any outstanding state income, corporation, and sales (including failure to file or register) will cause your application to be rejected. If additional space is needed, please use white 8 1/2" x 11" paper. Type or print all information requested.

1. CORPORATE OR APPLICANT NAME  
**Aspen Energy Corporation**

2. BUSINESS PHONE NO. ( **614** ) **884-5300**  
 CONTACT PERSON(S) FOR TAX ACCOUNTS:  
**Jonathan Peele**

3. TRADE/FICTITIOUS NAME (IF ANY)

4. LICENSED ADDRESS (STREET, RURAL ROUTE, P.O. BOX NO.) (POST OFFICE) STATE)  
 (ZIP)

**4789 Rings Road Ste 100 Dublin, OH 43017**

5. TYPE OF ENTITY  SOLE PROPRIETOR  PARTNERSHIP  CORPORATION  LLC  
 OTHER (Describe...)

**6. LIST OWNER(S), GENERAL PARTNER(S), OR CORPORATE OFFICER(S)**

NAME (PRINT)	SOCIAL SECURITY NUMBER - For Sole Proprietor with NO EIN ONLY
Jonathan Peele, President	_____ - _____ - _____
NAME (PRINT)	
NAME (PRINT)	
NAME (PRINT)	
NAME (PRINT)	

**7. LIST THE FOLLOWING STATE & FEDERAL TAX IDENTIFICATION NUMBERS (ALL ITEMS ARE TO BE COMPLETED)**

Applicant must provide explanation if submitting N/A for any items

Item A - Designated by the Pennsylvania Department of Revenue.  
 Item B - Designated by the Internal Revenue Service.  
 Item C - Designated by the Pennsylvania Department of Revenue. The Corporate Box number may also be referred to as the Corporate Account number.

<b>A. SALES TAX LICENSE (8 DIGITS)</b> _____ APPLICATION PENDING <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<b>C. CORPORATE BOX No. (7 DIGITS)</b> _____ APPLICATION PENDING <input type="checkbox"/>
<b>B. EMPLOYER ID (EIN) (9 DIGITS)</b> 31-1718170 APPLICATION PENDING <input type="checkbox"/> N/A <input type="checkbox"/>	<b>-OR- REVENUE ID NUMBER (10 DIGITS)</b> 11000255155

8. Do you have PA employees resident or non-resident?  YES  NO

9. Do you own any assets or have an office in PA?  YES  NO

NAME AND PHONE NUMBER OF PERSON(S) RESPONSIBLE FOR FILING TAX RETURNS  
 Jonathan Peele (614) 884-5300

PA SALES AND USE TAX: Jonathan Peele  
 EMPLOYER TAXES: Jonathan Peele  
 CORPORATE TAXES: Jonathan Peele

PHONE (614) 884-5300      PHONE (614) 884-5300      PHONE (614) 884-5300

Telephone inquiries about this form may be directed to the Pennsylvania Department of Revenue at the following numbers: (717) 787-1064, TDD# (800) 447-3020 (Hearing Impaired Only)

- 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.

**Applicant does not have any 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. Aspen Energy Corporation is doing business in Pennsylvania as an Electric Broker but not doing business as a broker/marketer for natural gas.

- 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.

Aspen Energy will be calling on Pennsylvania companies to sell natural gas services on behalf of certified suppliers. We will be selling over the phone and face to face appointments. We will be utilizing our staff of twenty-four Energy Consultants to obtain business. Aspen Energy does not provide billing statements and does not take title to natural gas.



Columbia Gas  
of Pennsylvania  
A NiSource Company

May 29, 2018

Jason Heinmiller  
Aspen Energy Corporation  
4789 Ring Road Suite 100  
Dublin, OH 43017

RECEIVED  
JUL 12 2018  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Jason Heinmiller:

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



375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

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

**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)

June 26, 2018

Jonathan Peel  
President  
Aspen Energy Corporation  
4789 Rings Road Suite 100  
Dublin, OH 43017

Dear Mr. Peel:

We are pleased that Aspen Energy Corporation 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 Aspen Energy Corporation is not currently serving customers on the Peoples systems, we have determined at this time that Aspen Energy Corporation 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 Aspen Energy Corporation 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



**National Fuel**

June 13, 2018

Jonathan Peele, President  
Aspen Energy Corporation  
4789 Rings Road, Suite 100  
Dublin, OH 43017

Re: Aspen Energy Corporation

Dear Jonathan,

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

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

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

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

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

Yours truly,

Nicole Barker  
Transportation Services Department



An Exelon Company

July 6, 2018

Aspen Energy Corporation  
4789 Rings Road, Suite 100  
Dublin, OH 43017

Re: Broker Requirements

Dear Aspen Energy Corporation:

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

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

Respectfully submitted,

A handwritten signature in black ink that reads "Carlos P. Thillet".

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



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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July 12, 2018

Ms. Sandy Jackson  
Aspen Energy Corporation  
4789 Rings Road, Suite 100  
Dublin, OH 43017  
Email: [sjackson@aspenenergy.com](mailto:sjackson@aspenenergy.com)

RE: Security Requirement Bond for Aspen Energy Corporation

Dear Ms. Jackson:

Philadelphia Gas Works ("PGW") is aware that Aspen Energy Corporation has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works.

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

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

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

If you have any questions concerning the foregoing, please contact me at 215-684-6278.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicholas LaPergola', is written over a horizontal line.

Nicholas LaPergola  
Director, Supply, Transportation & Control

NL/dls



+ Energy to do more®

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

June 28, 2018

Sandy Jackson  
Administrative Assistant  
Aspen Energy Corporation  
4789 Rings Rd Suite 100  
Dublin, OH 43017

RE: Aspen Energy Corporation application to serve as a Natural Gas Broker

Dear Ms. Jackson,

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

A handwritten signature in black ink, appearing to read "David E. Lahoff". The signature is written in a cursive style with some loops and flourishes.

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



# VALLEY ENERGY

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

July 9, 2018

**VIA EMAIL**

Ms. Sandy Jackson, Administrative Assistant  
Aspen Energy Corporation  
4789 Rings Rd., Suite 100  
Dublin, OH 43017  
[sjackson@aspenenergy.com](mailto:sjackson@aspenenergy.com)

Dear Ms. Jackson:

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



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PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH ST  
HARRISBURG PA 17120-0211

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