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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Subject: Docket No. A-2018-3002875

To Whom it May Concern:

Attached are the answers to your questions regarding our application

If you have any questions or concerns please do not hesitate to contact me directly at 216-502-4410 or pnero@integenergy.com

Sincerely,

A handwritten signature in black ink, appearing to be "P. Nero", written in a cursive style.

Paul Nero
C.E.O.

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**Docket No. A-2018-3002875
Integrity Communications of Ohio LLC
Data Requests**

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1. **Reference Application, Page 4, Identity of Applicant – The Applicant stated the name of the applicant two different ways on this page. The first was Integrity Energy, TD, d/b/a Integrity Energy and the second was Integrity Communications of Ohio LLC D.B.A. Integrity Energy. These are not consistent with the Pennsylvania Department of State filing which shows the company's name as Integrity Communications of Ohio Ltd. Please provide an updated application page with the appropriate corrections.**
 - **See Corrected application page**

2. **Reference Application, Section 2.a, Fictitious Name – The Applicant failed to provide its fictitious name registration. Please provide the missing documentation.**
 - **We will not be using a fictitious name**

3. **Reference Application, Section 2.b, Formation Documents – The Applicant failed to provide its limited liability company formation documentation. Please provide the missing documentation.**
 - **See attached Pennsylvania Department of State registration**

4. **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-2010-2175245. Please file an updated Application page with the corrected information or an explanation about the status of that license.**
 - **See attached updated application page with corrected information**

5. **Reference Application, Section 4.d, Proposed Service Area – Applicant failed to provide bonding letters for Philadelphia Gas Works and National Fuel Gas Distribution Corporation. Please provide the missing documentation.**
 - **See attached bonding letters**

6. **Reference Application, Section 7.b, Financial Fitness – The Applicant failed to provide sufficient documentation to demonstrate financial fitness. Please provide**

financial fitness documentation that includes the applicants 2017 financial statement and tax return.

- We have elected to extend our 2017 tax filing, the most current tax returns are 2016. Our 2017 financial statements are not completed either, 2016 is the most current.

7. Reference Application, Section 7.f, Taxation – The Applicant failed to correctly complete the Tax Certification Statement.

- a. Box 1, the Applicant stated the name as Integrity Energy. This is not consistent with the Pennsylvania Department of State filing which shows the company's name as Integrity Communications of Ohio Ltd.
- b. Box 2 has Contact Person(s) for Tax Accounts and only a phone number is required.
- c. Applicant also failed to provide a fictitious name, a Corporate Box # or a Revenue ID Number. Please resubmit a complete Tax Certification Statement.

- See attached corrected Tax Certification Statement

8. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide a license for Pennsylvania, Illinois, Maryland, Texas, Rhode Island, Massachusetts, and Connecticut. Please provide the missing documentation.

- See attached list of license's for additional states

9. Reference Application, Section 11, Affidavits – The Applicant failed to correctly complete the application's Affidavits.

- a. The Affidavits were submitted with Integrity Energy as the Name of Applicant. This is not consistent with the Pennsylvania Department of State filing which shows the company's name as Integrity Communications of Ohio Ltd.
- b. The Affiant, Paul Nero, is entered as the Applicant. The Applicant would be Integrity Communications of Ohio Ltd. Please resubmit a correct Application Affidavit and the Operations Affidavit.

- See attached corrected Affidavit

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Integrity Energy Communications of Ohio Ltd., 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 Ltd.
5711 Grant Ave
Cleveland Ohio 44105
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 Asslt, LTD / AAAGENT Services LLC
300 N 2nd 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

- 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

Mike Naughton
President
5711 Grant Ave
Cleveland Ohio 44105

Phone: 216-502-4409
Fax: 216-502-4409
mnaughton@integenergy.com

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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")

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.

A2

ST, PAO4B

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

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU
Application For Registration - Foreign

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- > Registered Limited Liability General Partnership (§ 8211)
- Registered Limited Liability Limited Partnership (§ 8211)
- Limited Partnership (§ 8582)
- Limited Liability Company (§ 8931)

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
<i>AAAagents Services, LLC</i>				<i>Dauphin</i>
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:

<i>5711 Grant Ave</i>	<i>Cleveland</i>	<i>OH</i>	<i>44105</i>	<i>CA \$250</i>
Number and Street	City	State	Zip	

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

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
18th 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.

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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)

Integrity Communications of Ohio is currently a licensed EGS in the state of Pennsylvania

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):



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

July 12, 2018

Mr. Paul Nero
Integrity Communications of Ohio Ltd.
5711 Grant Avenue
Cleveland, OH 44105
Email: PNero@integenergy.com

RE: Security Requirement Bond for Integrity Communications of Ohio Ltd.

Dear Mr. Nero:

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

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Integrity Communications of Ohio Ltd. does not need to post a bond or other form of security to operate in its service territory. If the services provided by Integrity Communications of Ohio Ltd. should change, Philadelphia Gas Works reserves the right to require security from Integrity Communications of Ohio Ltd. 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 that reads "Nicholas LaPergola".

Nicholas LaPergola
Director, Supply, Transportation & Control

NL/dls



National Fuel

July 10, 2018

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

Re: Integrity Communications of Ohio LTD

Dear Paul,

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

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

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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 Communications of Ohio Ltd.
(Name of Applicant);]

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

Integrity Communications
That OF OHIO LTD, 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.

Integrity Communications
That OF OHIO LTD, 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.

Integrity Communications
That OF OHIO LTD, 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)

Integrity Communications

That OF Ohio Ltd, 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.

R M
Signature of Affiant

Sworn and subscribed before me this 13 day of July, 2018.



E. Rayl
Signature of official administering oath

My commission expires 02/05/2023.

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Appendix A

APPLICATION AFFIDAVIT

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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 Communications OF Ohio Ltd. (Name of Applicant);]

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

That the Applicant herein Integrity Communications OF Ohio Ltd. 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 Integrity Communications OF Ohio Ltd. has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein Integrity Communications OF Ohio Ltd. 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 Integrity Communications OF Ohio Ltd. 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 13 day of July, 2018.



[Signature]
Signature of official administering oath

My commission expires 02/05/2023

I, PAUL NERO, 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).

Signature:  Date: 7/13/18

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State**License #**

Pennsylvania	A-2010-2175245
Ohio	11-339E
Connecticut	10-04-18
Maryland	IR-1985
Illinois	10-0425
Rhode Island	D-96-6
Massachusetts	EB-164
Texas	N/A



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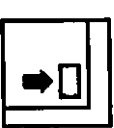
CUSTOMS:

For international use affix customs declaration PS 2976.

HOW TO USE:



1. Complete Address Area
Type or Print required return address and addressee information in customer block area or on label.



2. Payment Method
Affix postage or meter strip to area indicated in upper right hand corner.



3. Acceptance
Bring your Flat Rate Priority Mail envelope to a Post Office, or to schedule pickup of your postage paid envelopes visit us at usps.com/pickup.

We Deliver!

		Click-N-Ship®	
P	usps.com	9410 8036 9930 0099 9511 24 0092 5000 0031 7120	
	\$9.25	US POSTAGE	
	Flat Rate Env		
	Signature Confirmation		
07/19/2018		Mailed from 44105 062S0000001309	
PRIORITY MAIL 2-DAY™			
PAUL NERO INTEGRITY ENERGY 5711 GRANT AVE CLEVELAND OH 44105-5605		Expected Delivery Date: 07/21/18 0004	
SIGNATURE REQUIRED		C000	
SHIP TO: ROSEMARY CHIAVETTA PENNSYLVANIA PUBLIC UTILITY COMMISSION 400 NORTH ST HARRISBURG PA 17120-0211			
USPS SIGNATURE TRACKING #			
9410 8036 9930 0099 9511 24			
Electronic Rate Approved #038555749			



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Cradle to Cradle Certification is awarded to products that pursue an innovative vision of ecologically-intelligent design that eliminates the concept of waste. This USPS® packaging has been certified for its material content, recyclability, and manufacturing characteristics.