

Alan M. Seltzer
717 237 4862
Alan.seltzer@bipc.com

409 North Second Street, Suite 500
Harrisburg, PA 17101-1503
T 717 237 4800
F 717 233 0852
www.bipc.com

October 17, 2018

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

Re: Application of SouthStar Energy Services LLC D/B/A Pennsylvania Energy for Approval to Offer, Render, Furnish or Supply Natural Gas Supply Services as a Supplier or Aggregator to the Public in the Commonwealth of Pennsylvania,
Docket No. A-2018-_____

Dear Secretary Chiavetta:

Attached for e-filing with the Pennsylvania Public Utility Commission ("Commission") is the signed and verified Application of SouthStar Energy Services LLC D/B/A Pennsylvania Energy ("SouthStar") for Approval to Offer, Render, Furnish or Supply Natural Gas Supply Services as a Supplier or Aggregator to the Public within the Commonwealth of Pennsylvania. Included with the Application are various Appendices and Attachments in support of the Application, including the following items pursuant to the Commission's regulations and requirements:

- The \$350 filing fee is being hand delivered to the Commission separately;
- Application Affidavit and Operations Affidavit (Appendices A and B);
- Proof of Publication (Attachment 12);
- Confidential Tax Certification Statement – will be submitted separately under seal of confidentiality as Confidential Exhibit 7f;
- Commonwealth Department of State Verification (Attachments 2a, 2b, 2c);
- Proof of Service showing that the Application and all non-confidential documents are being served upon the parties listed on the Certificate of Service (Attachment 6); and
- Bond Letters from the Natural Gas Distribution Companies in whose service territories SouthStar is proposing to provide service (Attachment 7a).

Rosemary Chiavetta, Secretary
October 17, 2018
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A hardcopy of SouthStar's confidential documents will be filed via hand delivery with the Commission separately under seal of confidentiality.

If you have any questions regarding this e-filing, please contact me. Thank you.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Alan M. Seltzer".

Alan M. Seltzer

Counsel for SouthStar Energy Services LLC
D/B/A Pennsylvania Energy

AMS/gm
Attachments
cc: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of SouthStar Energy Services LLC, d/b/a Pennsylvania Energy, for approval to offer, render, furnish, or supply natural gas supply services as a(n) [as specified in item #4b below] 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:

SouthStar Energy Services LLC D/B/A Pennsylvania Energy
817 W. Peachtree Street NW, Suite 1000
Atlanta, Georgia 30308
www.pennsylvaniaenergy.com
404-685-4000

- 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.

CT Corporation System
600 North 2nd Street
Suite 401
Harrisburg, Pennsylvania 17101
614-280-3338 (phone) NO FAX NUMBER

- 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.

Trish McFadin
Director, Governmental Affairs
817 W. Peachtree Street NW, Suite 1000
Atlanta, Georgia 30308
404-685-4095 (office); 404-685-4118 (fax)
trish.mcfadin@southstarenergy.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.

Alan M. Seltzer, Esquire
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101
717-237-4862 (phone); 717-233-0852 Fax
alan.seltzer@bipc.com

- 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.

PRIMARY:
Lee Lively
Director, Operations Centers PO
BOX 78760
Atlanta, GA 30357
404-685-4148 (phone)
844-393-9006 (fax)
Lee.Lively@southstarenergy.com

ALTERNATE:
Nancy Hill
Manager, Consumer Relations PO
BOX 78760
Atlanta, GA 30357
404-685-4131 (phone)
844-393-9006 (fax)
nhill@southstarenergy.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")

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 Attachments 2a. and 2b.
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. Delaware. See Attachment 2c.
- Give name and address of officers.
See Attachment 2d.

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. See Confidential Attachment 3a.

Applicant does not have any affiliates that are currently applying to do business in Pennsylvania.

- 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.

SouthStar Energy Services LLC D/B/A Pennsylvania Energy 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.

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.

SouthStar Energy Services LLC D/B/A Pennsylvania Energy intends to provide retail natural gas supply service to residential, small commercial and large commercial & industrial customers and governmental customers in the state of Pennsylvania, by offering variable and fixed pricing.

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 type="checkbox"/> Philadelphia Gas Works |
| <input type="checkbox"/> National Fuel Gas | <input type="checkbox"/> UGI Central Penn |
| <input type="checkbox"/> PECO | <input type="checkbox"/> UGI Penn natural |
| <input checked="" type="checkbox"/> Peoples Gas – Equitable Div. | <input type="checkbox"/> UGI Utilities |
| <input checked="" type="checkbox"/> Peoples Natural Gas | <input type="checkbox"/> Valley Energy |
| <input checked="" type="checkbox"/> Peoples Gas Company | <input 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. March 31, 2019

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.

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.

See Confidential Attachment 5a.

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

See Confidential Attachment 5b.

- 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.

See Confidential Attachment 5c.

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

See Confidential Attachment 5d.

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)

See Attachment 6.

- 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>Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com</p>	
<p>Peoples Natural Gas – Equitable Division Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com</p>	<p>National Fuel Gas Distribution Corp. David D. Wolford 6363 Main Street Williamsville, NY 14221 PH: 716.857.7483 FAX: 716.857.7479 e-mail: wolfordd@natfuel.com</p>
<p>The Peoples Natural Gas Company Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com</p>	<p>PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com</p>
<p>Peoples Gas Company Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com</p>	<p>Philadelphia Gas Works Nicholas LaPergola 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.684.6278 email: nicholas.lapergola@pgworks.com</p>
<p>UGI Central Penn David Lahoff 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com</p>	<p>UGI David Lahoff 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com</p>
<p>Valley Energy Inc. Ed Rogers 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: erogers@ctenterprises.org</p>	<p>UGI Penn Natural David Lahoff 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com</p>

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 Attachment 7a.

- 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.
- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient). See <https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0001004155&owner=exclude&count=40&hidefilings=0>
- Applicant's accounting statements, including balance sheet and income statements for the past two years.
- 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.
- 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.
- 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.

See Confidential Attachment 7b.

- 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.

SouthStar Energy Services LLC D/B/A Pennsylvania Energy intends to use a Southern Company Gas Parental Guarantee for its Pennsylvania operations in the form contained in Confidential Attachment 7c.

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

N/A

- 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.

Freda Porter
Manager, Gas Accounting
817 W. Peachtree Street NW, Suite 1000
Atlanta, Georgia 30308
404-685-4083 (phone)
404-685-4118 (fax)
freda.porter@southstarenergy.com

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application. See Confidential Attachment 7f.

All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by natural gas distribution companies does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

- a. **EXPERIENCE, PLAN, STRUCTURE:** such information may include:

- Applicant's previous experience in the natural gas industry.
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

See Attachment 8a (Public Version) and Confidential Attachment 8a (Confidential Version).

- 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.

See Attachment 8d.

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.

See Attachment 8e.

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.

See Attachment 9.

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 30th 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.

See 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.

See 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.

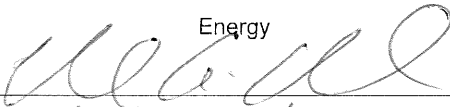
See Attachment 12.

	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)

13. SIGNATURE

Applicant: SouthStar Energy Services LLC D/B/A Pennsylvania

By: 
 Title: President

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: SouthStar Energy Services LLC D/B/A Pennsylvania Energy

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

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Georgia _____ :

_____ : ss.

County of Fulton _____ :

Michael A. Braswell, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the President and CEO (Office of Affiant) of SouthStar Energy Services LLC D/B/A Pennsylvania Energy

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

That the Applicant herein SouthStar Energy Services LLC D/B/A Pennsylvania Energy 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 SouthStar Energy Services LLC D/B/A Pennsylvania Energy has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein SouthStar Energy Services LLC D/B/A Pennsylvania Energy 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 SouthStar Energy Services LLC D/B/A Pennsylvania Energy 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.

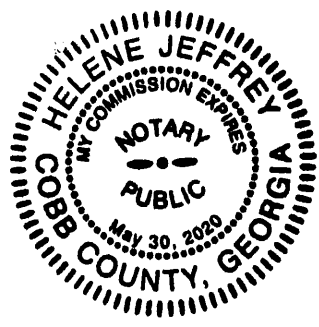
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Handwritten Signature]
Signature of Affiant

Sworn and subscribed before me this 19 day of September, 2018.

[Handwritten Signature]
Signature of official administering oath

My commission expires May 30, 2020.



Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Georgia :

: ss.

County of Fulton :

Michael A. Braswell, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the President and CEO (Office of Affiant) of SouthStar Energy Services LLC D/B/A Pennsylvania Energy (Name of Applicant);

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

That SouthStar Energy Services LLC D/B/A Pennsy Ivania Energy, 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 SouthStar Energy Services LLC D/B/A Pennsy Ivania Energy, 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 SouthStar Energy Services LLC D/B/A Pennsylvania Energy, 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).

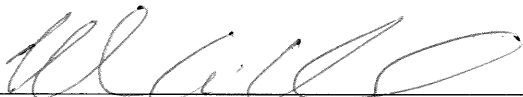
Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That SouthStar Energy Services LLC D/B/A Pennsylvania Energy, 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.

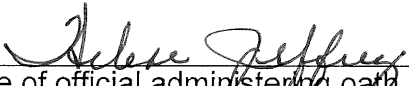
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the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

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



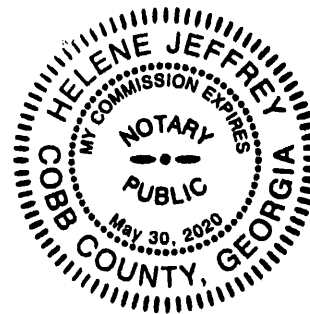
Signature of Affiant

Sworn and subscribed before me this 19 day of September, 2018.



Signature of official administering oath

My commission expires May 30, 2020.



Appendix C

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

Example CERTIFICATE OF SERVICE

On this the _____ day of _____ 20____, 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>Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120</p>	<p>Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120</p>
<p>Office of the Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101</p>	<p>Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946</p>
<p>Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com</p>	<p>Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120</p>
<p>Peoples Natural Gas – Equitable Division Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com</p>	<p>National Fuel Gas Distribution Corp. David D. Wolford 6363 Main Street Williamsville, NY 14221 PH: 716.857.7483 FAX: 716.857.7479 e-mail: wolfordd@natfuel.com</p>
<p>The Peoples Natural Gas Company Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com</p>	<p>PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com</p>
<p>Peoples Gas Company Lynda Petrichevich 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6528 FAX: 412.208.6577 e-mail: Lynda.w.petrichevich@peoples-gas.com</p>	<p>Philadelphia Gas Works Nicholas LaPergola 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.684.6278 email: nicholas.lapergola@pgworks.com</p>

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

John Doe, President ABC Corp.

COMMONWEALTH OF
PENNSYLVANIA
PUBLIC UTILITY COMMISSION

Appendix D (CONFIDENTIAL)
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	2. BUSINESS PHONE NO. CONTACT PERSON(S) FOR TAX ACCOUNTS:
--------------------------------	--

3. TRADE/FICTITIOUS NAME (IF ANY) _____

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

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

6. LIST OWNER(S), GENERAL PARTNERS, OR CORPORATE OFFICERS(S)

NAME (PRINT)	SOCIAL SECURITY NUMBER - For Sole Proprietor with NO EIN ONLY
	_ _ _ _ - _ _ _ - _ _ _ _ _
NAME (PRINT)	
NAME (PRINT)	
NAME (PRINT)	
NAME (PRINT)	

7. LIST THE FOLLOWING STATE & FEDERAL TAX IDENTIFICATION NUMBERS (ALL ITEMS A,B, & C MUST 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.

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

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

PA SALES AND USE TAX _____	EMPLOYER TAXES _____	CORPORATE TAXES _____
PHONE _____	PHONE _____	PHONE _____

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)

Appendix E

Sample Disclosure Statement Format for Natural Gas Suppliers

This is an agreement for natural gas services, between (*NGS name*) and (*customer's name and full address*).

Background

We at (*NGS name*) are licensed by the Pennsylvania Public Utility Commission to offer and supply natural gas services in Pennsylvania. Our PUC license number is (A-XXXX-XXXXXXXX).

- Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution or delivery prices and services.

Include one of the two following options:

- You will receive a single bill from (*billing agent name*) that will contain (*NGDC name*) charges and (*NGS name*) charges.
- You will receive a separate bill from (*NGS name*) for generation charges and a separate bill from (*NGDC name*) for its charges.

- Right of Rescission - you may cancel this agreement at any time before midnight of the third business day after receiving this disclosure. You can contact us by phone, in writing or electronically (if available) to cancel this agreement. See Section (X) for how to contact us.

Definitions

Define any terms that may not be commonly understood by consumers. See the glossary on www.pagasswitch.com for standard definitions.

- Commodity charges: *The charges for basic gas supply service which is sold either by volume (Ccf or Mcf) or heating value (Dekatherms).*
- Nonbasic Charges - *Define each nonbasic service being offered.*

Terms of Service

1. (a) **Basic Service Prices** - *Itemize Basic Services you are billing for and their prices.*

Include one of the following options:

FIXED PRICE: You will pay (NGS Price) per (Mcf/Dth/ccf) for the commodity of natural gas.

- *Explain what is included in this price. The NGS's basic service price should include everything that is included in the NGDC's Price-to-Compare. Suggested language: "This price includes natural gas commodity charges, estimated Total State Taxes, but excludes applicable state and local Sales Tax."*

VARIABLE PRICE: You will pay a variable price that can change (monthly, quarterly, etc.). The price for the first billing period will be (NGS price).

- *Explain what is included in this price. The NGS's basic service price should include everything that is included in the NGDC's Price-to-Compare. Suggested language: "This price includes natural gas commodity charges and estimated Total State Taxes, but excludes applicable state and local Sales Tax."*
- *Suppliers are to include any variable pricing conditions and limits. If there are no limits, the NGS shall clearly and conspicuously state that there is no limit on how much the price may change from one billing cycle to the next. Information on the limits of price variability, or the lack of limits, must appear in a larger type size. The customer also needs to be informed of when and how they will receive notification of price changes. For example, if the customer is not going to be notified of price changes until the new price appears on their bill, the customer should be informed of this. If the customer will be receiving advance notice of price changes, the customer should be told when and how these notices will be provided.*
- *More information about this variable price product, including what this price has been for the past 24 months, can be found at (www.companywebsite.com) or you can call ((XXX) XXX-XXXX). However, please remember that past prices do not indicate present or future prices.*

INTRODUCTORY PRICE: You will pay an Introductory Price of (NGS Price) per (Mcf/Dth/ccf) for the commodity of natural gas for the first XX months/billing cycles. After this Introductory Price expires, you will pay (NGS Price) per (Mcf/Dth/ccf) for the commodity of natural gas.

- *Explain what is included in this price. The NGS's basic service price should include everything that is included in the NGDC's Price-to-Compare. Suggested language: "This price includes natural gas commodity charges and estimated Total State Taxes, but excludes applicable state and local Sales Tax."*

If the price is variable, the information found above concerning VARIABLE PRICES must be included.

(b) Other Basic and Nonbasic Service Prices - *Itemize other Basic and Nonbasic Services you are offering and their prices. This includes any monthly fees, if applicable.*

2. Length of Agreement

Include one of the following two options:

Fixed Duration/Length Agreement — You will buy your natural gas commodity service for the above address from (NGS) beginning on the date set by your Natural Gas Distribution Company (NGDC) and will continue for (XX) months (or billing cycles).

Month-to-Month Agreement — You will buy your natural gas commodity service for the above street address from (NGS) beginning on the date set by your Natural Gas Distribution Company (NGDC) and will continue on a month to month basis until cancelled by either the customer or (NGS). See Section (X) for how to cancel this agreement.

3. Special Terms and Conditions - List and explain all that apply.

Sign-up bonuses

Add-ons

Limited time offers

Other Sales Promotions

Exclusions

4. Special Services - Provide explanation of price, terms and conditions, if applicable.

5. Penalties, Fees and Exceptions - List any that apply, including a late payment charge.

Penalties/Fees assessed on a customer for early termination of the agreement should be in plain language and easy for the customer to understand. The penalty/fee should be listed as a dollar amount or explained so that the customer can easily determine the amount of the penalty. The print size for this section must be larger than the print in the rest of the agreement.

6. Cancellation Provisions - This category may consist of both customer initiated cancellation provisions and supplier initiated cancellation provisions.

7. Agreement Expiration/Change in Terms

If you have a fixed duration contract approaching the expiration date, or whenever we propose to change the terms of service, you will receive two separate written notifications, the first approximately 60 to 75 days in advance and the second 45 days in advance of either the expiration date or the effective date of the proposed changes. These notifications will explain your options going forward.

8. Dispute Procedures

Contact us with any questions concerning our terms of service. See Section (X) for contact information.

9. Contract Assignment

If the contract is assignable, the NGS needs to include a section informing the customer of this possibility. The customer should be informed that contract terms and conditions remain unchanged under an assignment, and that the customer will receive prior notification of any subsequent assignment. If an assignment occurs, the NGS shall provide notice to the affected customer, the affected NGDC and the Commission. The customer notice must include the name of the new NGS, the contact information for the new NGS and language informing the customer that contract terms and conditions remain unchanged. See 52 Pa. Code 62.75(j).

10. Contact Information

Supplier Name:

Address:

Phone Number:

Internet Address:

11. Information about shopping for a Natural Gas Supplier is available from:

Pennsylvania Public Utility Commission (PUC)
400 North Street, Harrisburg PA 17120
1-800-692-7380
www.pagasswitch.com

Pennsylvania Office of Consumer Advocate
www.oca.state.pa.us

Natural Gas Supplier Contract Summary

Natural Gas Supplier Information	<i>Name, telephone number, website, etc. Plain language statement that NGS is responsible for gas commodity/supply charges.</i>
Natural Gas Price Structure	<i>Fixed, variable or other. If variable, based on what? If variable, how often is the price expected to vary? If variable, give any applicable ranges/ceilings. If no ranges/ceilings, a plain language statement indicating this fact. If variable, describe when the customer will receive notification of price changes in relation to time of month, final monthly meter read, billing cycle or when the price takes effect.</i>
Natural Gas Supply Price	<i>\$/unit or ¢/unit. If variable price, the first billing cycle's rate. Full disclosure of any introductory rate. If a monthly fee, disclose the amount and that it is in addition to the usage charges.</i>
Statement Regarding Savings	<i>Plain language that the supply price may not always provide savings to the customer.</i>
Deposit Requirements	<i>Any deposit requirements necessary for a customer and any terms associated with that deposit, in plain language.</i>
Incentives	<i>Any bonuses, discounts, cashback, offers, etc. and any associated terms, criteria and conditions, in plain language.</i>
Contract Start Date	<i>Plain language regarding the approximate start of NGS service.</i>
Contract Duration/Length	<i>In months, billing cycles, etc.</i>
Cancellation/Early Termination Fees	<i>Yes or no. If yes, describe the amount of the fee and how to avoid that fee, if possible.</i>
End of Contract	<i>Treatment of customer at the end of contract in plain language.</i>

Appendix F
EXAMPLE FORM OF NOTICE FOR NGS ONLY

PENNSYLVANIA
PUBLIC UTILITY COMMISSION

NOTICE

*Application of **Company Name** (d/b/a "**Trade Name**") For Approval To Offer, Render, or Furnish Natural Gas Services as a **Supplier, Aggregator, or Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.***

Company Name 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. **Company Name** proposes to sell natural gas and related services in [LIST NGDCS HERE] 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 **Company Name** 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 **Company's Name** attorney at the address listed below.

By and through Counsel: Attorney's Name

Company Name

Address

Address

Phone

FAX

Appendix G
EXAMPLE FORM OF NOTICE FOR COMBINED EGS AND NGS

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

*Applications of **Company Name** (d/b/a "**Trade Name**") For Approval To Offer, Render, or Furnish Services as a **Supplier, Aggregator, and Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.***

Company Name 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 of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. **Company Name** will also be filing an application with the PUC for a license to supply electricity or electric generation services as (1) a generator and supplier of electric power, (2) a broker/marketer engaged in the business of supplying electricity, and (3) an aggregator engaged in the business of supplying electricity. **Company Name** proposes to sell electricity, natural gas, and related services [LIST NGDCSs AND EDCS HERE] under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

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

By and through Counsel: Attorney's Name

Company Name

Address

Address

Phone

FAX

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. 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	jmccracken@pa.gov	Email
PA PUC	Lee Yalcin	717-787-6723	lyalcin@pa.gov	Email
PA EDEWG LDC Co-Chair	Ernie Mathie	330-384-5757	mathiee@firstenergycorp.com	Email
PA EDEWG ESP Co-Chair	Christine Hughey	713-963-3640	chughey@sperianenergy.com	Email
PA EDEWG Secretary & Regional EDI Change Control Manager	Brandon Siegel	412-817-8004	brandon.siegel@intelometry.com	Email

PA NGDC EDI Contacts

Company Name	Contact Name	Telephone	Email	Preference
PGW	PGW Gas Choice		pgwchoicemarketing@pgworks.com	Email
UGI Utilities Inc.	EDI Technical Support		edi@ugi.com	Email
UGI Utilities Inc.	David Lahoff	610-796-3520	dlahoff@ugi.com	email

ATTACHMENTS

SouthStar Energy Services LLC D/B/A Pennsylvania Energy NGS License Application Docket No. A-2018-_____

ATTACHMENT 2

Section 2, Business Entity Filings and Registration

- 2a. Fictitious Name Filing
- 2b. Business Entity and Department of State Filing
- 2c. Charter Documentation
- 2d. Names and Addresses of Officers

ATTACHMENT 6

Section 6, Proof of Service – Certificate of Service

ATTACHMENT 7a

Section 7.a., Financial Fitness: Bonding

Columbia Gas of Pennsylvania Bond Letter
Bond Letter from Peoples Natural Gas Company LLC, Peoples Natural Gas
Company LLC – Equitable Division, and Peoples Gas Company LLC

ATTACHMENT 8a (Public Version)

Section 8.a., Technical Fitness: Experience, Plan, Structure

Copies of Applicant's Licenses, Certificates or Orders in other states to provide
natural gas supply services

ATTACHMENT 8d

Section 8.d., Technical Fitness: Oversight of Marketing

Code of Conduct and Code of Ethics documents

ATTACHMENT 8e

Section 8.e., Technical Fitness: Officers and Resumes

Copies of Resumes of Chief Officers

ATTACHMENT 9

Section 9, Disclosure Statement

Draft Disclosure Statement and Contract Summary

ATTACHMENT 12

Section 12, Newspaper Publications

Notarized Proofs of Publications from:

Erie Times-News

Harrisburg Patriot News

Pittsburgh Post-Gazette

Williamsport Sun-Gazette

Johnstown Tribune-Democrat

Attachment 2. Business Entity Filings and Registration

a. Fictitious Name Filing

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Application for Registration of Fictitious Name
54 Pa.C.S. § 311

Name	_____		
Address	_____		
City	State	Zip Code	
792	PA	4440	50 PA 1

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

Commonwealth of Pennsylvania
FICTITIOUS NAME 2 Page(s)



T1024241009

Fee: \$70

In compliance with the requirements of 54 Pa.C.S. § 311 (relating to registration), the undersigned entity(ies) desiring to register a fictitious name under 54 Pa.C.S. Ch. 3 (relating to fictitious names), hereby state(s) that:

1. The fictitious name is:
Pennsylvania Energy

2. A brief statement of the character or nature of the business or other activity to be carried on under or through the fictitious name is:
Natural gas services

3. The address, including number and street, if any, of the principal place of business (P.O. Box alone is not acceptable):
Trish McFadin, 817 W. Peachtree St., N.W., Suite 1000, Atlanta, GA 30308, Fulton County

Number and street	City	State	Zip	County
-------------------	------	-------	-----	--------

4. The name and address, including number and street, if any, of each individual interested in the business is:

Name	Number and Street	City	State

DSCB:54-311-2

5. Each entity, other than an individual, interested in such business is (are):		
SouthStar Energy Services LLC	Limited Liability Company	Delaware
Name	Form of Organization	Organizing Jurisdiction
817 W. Peachtree St., N.W., Suite 1000, Atlanta, GA 30308		
Principal Office Address		
C T Corporation System	Dauphin County	
PA Registered Office, if any		
Name	Form of Organization	Organizing Jurisdiction
Principal Office Address		
PA Registered Office, if any		

6. The applicant is familiar with the provisions of 54 Pa.C.S. § 332 (relating to effect of registration) and understands that filing under the Fictitious Names Act does not create any exclusive or other right in the fictitious name.

7. Optional): The name(s) of the agent(s), if any, any one of whom is authorized to execute amendments to, withdrawals from or cancellation of this registration in behalf of all then existing parties to the registration, is (are):

IN TESTIMONY WHEREOF, the undersigned have caused this Application for Registration of Fictitious Name to be executed this

26th day of August, 2010.

Individual Signature	Individual Signature
Individual Signature	Individual Signature
Southstar Energy Services LLC	Entity Name
 Signature	Signature
President & CEO Title	Title

Attachment 2.

Business Entity Filings and Registration

b. Business Entity and Department of State Filing

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Application for Registration - Foreign
(15 Pa.C.S.)

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

Name	CT COUNTEL		
Address	CT COUNTEL		
City	State	Zip Code	
	PA	1924440 SO PAZ	

Commonwealth of Pennsylvania
APPLICATION FOR REGISTRATION 3 Page(s)



Fees: \$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:
SouthStar Energy Services LLC

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:

3. The name of the jurisdiction under the laws of which it was organized and the date of its formation:

Jurisdiction: Delaware Date of Formation: 7/13/1998

4. The (a) address of its initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and street City State Zip County

(b) Name of Commercial Registered Office Provider County
CT Corporation System Dauphin

DSCB:15-8981/8211/8582-2

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:

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:

817 W. Peachtree St., N.W., Suite 1000, Atlanta, GA 30308

Number and street	City	State	Zip

6. For Restricted Professional Limited Liability Company Only. Strike out if inapplicable: The company is a ~~restricted professional company organized to render the following professional service(s):~~

Limited Liability Partnership and Limited Partnership: Complete paragraphs 7 and 8

7. The name and business address of each general partner.

Name	Business Address

8. The address of the office at which is kept a list of the names and addresses of the limited partners and their capital contribution is:

Number and street	City	State	Zip	County

The registered partnership hereby undertakes to keep those records until its registration to do business in the Commonwealth is canceled or withdrawn.

IN TESTIMONY WHEREOF, the undersigned has caused this Application for Registration to be signed by a duly authorized officer/member or manager thereof this

26th day of August, 2010.

SouthStar Energy Services LLC

Name of Partnership/Company

[Signature]
Signature

President & CEO
Title

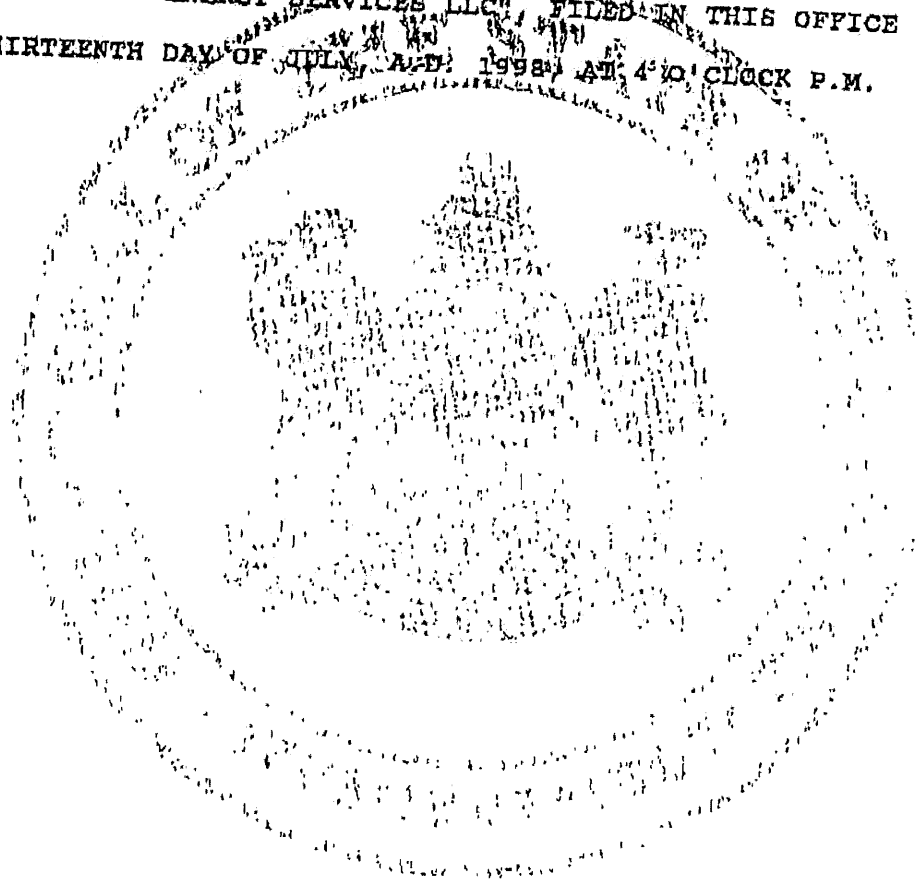
Attachment 2.

Business Entity Filing and Registration

c. Charter Documentation

Office of the Secretary of State

I, EDWARD J. FREEL, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF LIMITED LIABILITY COMPANY OF "SOUTHSTAR ENERGY SERVICES LLC" FILED IN THIS OFFICE ON THE THIRTEENTH DAY OF JULY, A.D. 1998, AT 4:10 CLOCK P.M.



Edward J. Freel

Edward J. Freel, Secretary of State

2919954 8100
981271283

AUTHENTICATION: 9193374
DATE: 07-14-98

(TUE) 07 14 98 10:38/ST 10:36/NO 3561004152 F 2:3

302-655-1476 FROM CORPORATION TRUST CO

**CERTIFICATE OF FORMATION
OF
SOUTHSTAR ENERGY SERVICES LLC**

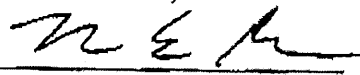
This Certificate of Formation is being executed as of July 13, 1998, for the purpose of forming a limited liability company pursuant to the Delaware Limited Liability Company Act, 6 Del. C. §§18-101, et seq. (the "Act").

The undersigned, being duly authorized to execute and file this Certificate, do hereby certify as follows:


1. Name. The name of the limited liability company is SouthStar Energy Services LLC (the "Company").
2. Registered Office and Registered Agent. The Company's registered office in the State of Delaware is located at Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware, New Castle County, Delaware 19801. The registered agent of the Company for service of process at such address is The Corporation Trust Company.
3. Dissolution. The Company does not have a specific date of dissolution.
4. Management. The business and affairs of the Company shall be managed by or under the direction of the Members.

IN WITNESS WHEREOF, the undersigned, being all the Members of the Company, have duly executed this Certificate of Formation as of the day and year first above written.

PIEDMONT ENERGY COMPANY
(Authorized Person)

By: 
Name: Thomas Skains
Title: Vice President

ATLANTA GAS LIGHT SERVICES, INC.
(Authorized Person)

By: 
Name: Stephen Gunther
Title: President

DYNEGY HUB SERVICES, INC.
(Authorized Person)

By: 
Name: Matthew Schatzman
Title: President

Attachment 2. Business Entity Filing and Registration

d. Names and Addresses of Officers

Michael A. Braswell, President and Chief Executive Officer,
817 W. Peachtree Street NW, Suite 1000, Atlanta, Georgia 30308.

John Jamieson, Senior Vice President, Retail Operations,
817 W. Peachtree Street NW, Suite 1000, Atlanta, Georgia 30308.

Michael Nieman, Senior Vice President, Commercial Operations,
817 W. Peachtree Street NW, Suite 1000, Atlanta, Georgia 30308.

Joanne A. Mello, Secretary,
817 W. Peachtree Street NW, Suite 1000, Atlanta, Georgia 30308.

Alina Lee, Assistant Secretary,
817 W. Peachtree Street NW, Suite 1000, Atlanta, Georgia 30308.

Attachment 6.

Proof of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SouthStar Energy Services LLC D/B/A :
Pennsylvania Energy Application For :
Approval to Offer, Render, Furnish Or :
Supply Natural Gas Supply Services : Docket No. A-2018-_____
As a Supplier or Aggregator to The :
Public in The Commonwealth of PA :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of SouthStar Energy Services LLC D/B/A Pennsylvania Energy's Natural Gas Supplier Application and all NON-CONFIDENTIAL attachments via First Class Mail in accordance with the requirements of 52 Pa. Code § 1.54 et seq., upon 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 Small Business Advocate
Commerce Building, Suite 1102
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


Peoples Natural Gas – Equitable Division
Lynda W. Petrichevich
375 North Shore Drive
Pittsburgh, PA 15212

Columbia Gas of Pennsylvania, Inc.
Michele Caddell
290 W. Nationwide Blvd.
Columbus, OH 43215

Peoples Natural Gas Company LLC
Lynda W. Petrichevich
375 North Shore Drive
Pittsburgh, PA 15212

Peoples Gas Company
Lynda W. Petrichevich
375 North Shore Drive
Pittsburgh, PA 15212

Date: October 17, 2018



Alan M. Seltzer, Esquire

Attachment 7.

Financial Fitness

a. Bonding

August 23, 2018

Patricia McFadin
Director
Pennsylvania Energy
817 W. Peachtree St N.W., Suite 1000
Atlanta, GA 30308

Dear Patricia McFadin:

We are pleased that Pennsylvania Energy has applied for a license to provide Natural Gas Supply Service 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, Pennsylvania Energy 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. We have determined at this time that Pennsylvania Energy has met the financial security requirement to provide Natural Gas Supply Service to Columbia Gas customers.

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

Please feel free to contact me at 614-460-4217 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 Nominations



375 North Shore Drive
Pittsburgh, Pennsylvania 15212

www.peoples-gas.com

Carol Scanlon
Manager, Rates & Regulation

Peoples Service Company LLC
Phone: 412-208-6931
Email: Carol.Scanlon@peoples-gas.com

July 10, 2018

Michael A. Braswell
President and CEO
SouthStar Energy Services LLC D/B/A Pennsylvania Energy
817 W. Peachtree Street NW, Suite 1000
Atlanta, Georgia 30308

Dear Mr. Braswell:

We are pleased that SouthStar Energy Services LLC D/B/A Pennsylvania 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 SouthStar Energy Services LLC D/B/A Pennsylvania Energy is not currently serving customers on the Peoples systems, we have determined at this time that SouthStar Energy Services LLC D/B/A Pennsylvania 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 SouthStar Energy Services LLC D/B/A Pennsylvania 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.

Sincerely,

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

Cc: Stephen Kelly
Mina Speicher

PUBLIC VERSION

Attachment 8. Technical Fitness

a. Experience, Plan, Structure

SouthStar Energy Services LLC (“SouthStar”) provides retail natural gas supply services in twelve states. SouthStar is the largest retail marketer of natural gas in Georgia, with an approximate current customer count around [REDACTED] and a market share of approximately [REDACTED]%. In Georgia, SouthStar operates under the trade name “Georgia Natural Gas,”; in Ohio, SouthStar operates under the trade name “Ohio Natural Gas”; in Florida, SouthStar operates under the trade name “Florida Natural Gas”; in New York, SouthStar operates under the trade name “New York Natural Gas”; in Maryland, SouthStar operates under the trade name “Maryland Energy”; in Michigan, SouthStar operates under the trade name “Grand Rapids Energy”; in New Jersey, SouthStar operates under the trade name “New Jersey Energy”; and, in Virginia, SouthStar operates under the trade name “Virginia Retail Energy.” SouthStar also serves commercial and industrial customers in Tennessee, North Carolina, South Carolina, and Alabama as “SouthStar Energy Services”. In Illinois, SouthStar’s subsidiaries operate under the brand names “Illinois Energy” and “Illinois Energy Solutions.”

SouthStar currently serves approximately [REDACTED] retail customers in Ohio and an additional [REDACTED] customers in Florida. SouthStar received regulatory approval in October 2010 to begin serving customers in New York, and currently serves no customers in New York. In December 2010, SouthStar also received regulatory approval to begin serving customers in Maryland and currently serves approximately [REDACTED] retail customers. In July 2013, SouthStar received regulatory approval to begin serving customers in Michigan and currently serves approximately [REDACTED] retail customers. In September of 2013, the New Jersey Board of Public Utilities granted SouthStar approval to begin serving residential and commercial customers in New Jersey, and SouthStar currently serves no customers in New Jersey. In the fall of 2016, SouthStar received regulatory approval to begin serving customers in Virginia, and currently serves approximately [REDACTED] customers. In Illinois, SouthStar’s subsidiaries serve approximately [REDACTED] retail customers.

SouthStar’s current staffing structure includes internal operations, including call centers, marketing and supply employees and agents, that are currently trained for serving the states in which SouthStar conducts business. Those employees and agents will be thoroughly trained to serve the Pennsylvania markets as well. SouthStar currently plans to provide retail natural gas services for residential and commercial end users, consistent with its operations in other states.

Attached are copies of SouthStar’s licenses, certificates or orders to provide natural gas supply services in other states. SouthStar currently has a license renewal application pending before the New Jersey Board of Public Utilities.



COMMISSIONERS:

ETV SE, CHAIRMAN
ROBERT B. BAKER, JR.
W D L BURGESS
BURDEN
LAUREN "BUBBA" McDONALD, JR.

9574

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

30832

HELEN O'LEARY
EXECUTIVE SECRETARY

Georgia Public Service Commission

47 TRINITY AVENUE, S.W.
ATLANTA, GEORGIA 30334-5701
(404) 556-4501 OR 1 (800) 252-5813
FAX: (404) 556-2341 www.psc.state.ga.us

Docket No. 9574-U

INTERIM CERTIFICATE ORDER

In re: Application of SouthStar Energy Services, LLC d/b/a Georgia Natural Gas Services for a Certificate of Authority as a Marketer of Firm Gas Supply Pursuant to O.C.G.A. Section 46-4-153

Interim Certificate No.: GM-0017
Date Issued: October 6, 1998

APPEARANCES

FOR SOUTHSTAR ENERGY SERVICES, LLC:

Robert B. Remar, Attorney

FOR THE COMMISSION STAFF:

Marc Biondi, Student Law Clerk

FOR THE CONSUMERS' UTILITY COUNSEL:

Joel Geer, Attorney

FOR ATLANTA GAS LIGHT COMPANY:

William E. Rice, Attorney

BY THE COMMISSION:**I. STATEMENT OF PROCEEDINGS****A. Summary and Jurisdiction**

This matter came before the Georgia Public Service Commission on the application of SouthStar Energy Services, LLC d/b/a Georgia Natural Gas Services ("SouthStar" or "Applicant") for a certificate of authority to market and provide natural gas commodity sales service to retail customers who receive primarily firm service, pursuant to the Natural Gas Competition and Deregulation Act, particularly O.C.G.A. Section 46-4-153, and the Commission's Rules, Chapter 515-7-3. Each interim certificate is specific to the delivery pool group(s) on the Atlanta Gas Light Company ("AGLC") distribution system for which the Applicant receives authority to serve. Pursuant to Commission Rule 515-7-3-.05, the Commission issued its initial order approving the application, with conditions, on October 6, 1998.

The Commission received a recommendation in this matter from the Hearing Officer who conducted the hearing, took the evidence and certified the record to the Commission pursuant to O.C.G.A. Sections 46-2-58(d) and 50-13-17(a). Based upon the evidence in the record, the Hearing Officer submitted recommended findings of technical and financial capability, recommended conclusions of law and recommended conditions for an interim certificate. The Commission Staff ("Staff") also made recommendations to the Commission, particularly regarding certain generic conditions that should be imposed upon all the interim certificates of authority issued to new competitors in this industry. After considering the recommendations of the Hearing Officer and Staff, the Commission found and concluded that the recommendations should be adopted in its October 6, 1998 Order. The Commission affirms these findings and conclusions in this full Interim Certificate Order.

B. Issues and Proceedings

SouthStar Energy Services, LLC, d/b/a Georgia Natural Gas Services filed with the Commission an application for a certificate of authority to provide natural gas marketing services pursuant to O.C.G.A. Sections 46-4-150 et seq. and Commission Rule Chapter 515-7-3 on July 15, 1998. The Commission scheduled a hearing before Hearing Officer Robert F. Dallas on September 11, 1998, to obtain evidence relating to such application.

SouthStar appeared at the hearing and presented the testimony of Stephen J. Gunther in support of its application. SouthStar also submitted into evidence exhibits including its application, the affidavit of publication of the hearing notice, financial information requested by the Staff and revisions to its application. The application as originally filed was verified by Mr. Gunther. Applicant further submitted documents pursuant to trade secret protection allowed under Commission Rule Chapter 515-3-1-.11. All trade secret documents were reviewed by the Staff and the Hearing Officer. No intervenor filed any objection to the trade secret protection request of the Applicant.

The Consumers' Utility Counsel Division of the Governor's Office of Consumer Affairs ("CUC") and AGLC intervened in the proceeding and, along with the Staff, cross-examined SouthStar's witness, but submitted no objections to the application. SCANA intervened but did not appear at the hearing and submitted no objection to the application.

Pursuant to O.C.G.A. Section 46-4-153(a)(2), the Commission has the authority to certify applicants that demonstrate satisfactory financial and technical capability, sufficient gas supply, and that they will offer such certificated service pursuant to rules and contract terms which the Commission finds economically viable for the territory which the applicant proposes to serve.

II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

Mr. Gunther is Applicant's President. SouthStar is a Delaware limited liability company. SouthStar is a joint venture of Atlanta Gas Light Services, Inc., Dynegy Hub Services, Inc., and Piedmont Energy Company. Atlanta Gas Light Services, Inc., is affiliated with Atlanta Gas Light Company, which is the electing distribution company ("EDC"), and the major provider of retail natural gas in Georgia.

Mr. Gunther verified the truthfulness of the information and documents contained in the subject application. SouthStar seeks to market and sell natural gas to commercial, residential and industrial customers in Georgia. SouthStar proposes to serve all nine delivery groups served by AGLC within the State of Georgia.

SouthStar anticipated being able to sign up Georgia customers in all delivery groups as soon as it received authority. Customer inquiries, orders or complaints will be handled from Applicant's call center, which shall be open twenty-four hours per day seven days per week. The call center for Applicant may be accessed via a local or toll-free call. Applicant did not seek in its application to provide prepaid services, or to own its own gas meters. Applicant agreed to pass through any AGLC discounts to eligible senior citizen customers.

SouthStar has agreed to abide by all applicable laws under the Official Code of Georgia Annotated, all applicable rules and regulations of the Commission and findings, conclusions, terms and conditions set forth in pertinent Commission orders. No other party offered any evidence in opposition to Applicant's testimony or documentary submissions.

A. Technical Capability

SouthStar demonstrated its technical and managerial expertise in the natural gas industry. The Hearing Officer reviewed the application pursuant to the standards of Commission Rule 515-7-3-.04 in order to determine technical capability to render

service. SouthStar's joint venture affiliate AGLC has long been in the business of selling firm natural gas to Georgia customers. Through the testimony of Mr. Gunther and evidence submitted with its application, SouthStar made a showing of the technical capability to perform the following;

- (a) obtain sufficient gas supply to meet the requirements of its proposed service;
- (b) forecast required firm load capacity to meet required load demand;
- (c) provide back-up gas supplies in the event of a disruption in gas supply;
- (d) provide ancillary services to firm customers, including but not limited to billing, billing inquiries, payment processing, customer service inquiries and telephone support.

Based on the undisputed evidence presented, SouthStar Energy Services, LLC satisfies the requirements of technical capability to provide firm natural gas marketing services.

B. Financial Capability

SouthStar evidenced its financial capability through the agreed-upon support by its limited liability principals, Atlanta Gas Light Services, Inc., Piedmont Energy Company and Dynegy Hub Services, Inc. These principals are required to provide financial support under their Limited Liability Company Agreement filed as a trade secret. These companies' respective financial ratings are as follows: Atlanta Gas Light Services - Moody's Baa2; Piedmont Energy Company - Moody's Baa1; and Dynegy Hub Services - Moody's A2. SouthStar proved to the Commission's satisfaction that it will be financially supported by its limited liability principals. Applicant stated that it has secured financial support from its limited partner principals to meet the periods of time when the Applicant is not profitable. The Commission's finding of the financial capability of Applicant is dependent on the financial support that it receives from its limited liability principals. If, for any reason, this support is withdrawn, then Applicant must provide written notice to the Commission of this occurrence within ten days of its receipt. This notice shall include documentary proof of SouthStar's financial capability to meet its obligations as a natural gas marketer in Georgia. Applicant has shown that it has the ability to meet the creditworthiness standards of the interstate pipelines serving the State of Georgia and the Commission-approved creditworthiness standards of Atlanta Gas Light Company. Applicant has also shown that it will offer service pursuant to rules and contract terms which are economically viable for the delivery groups that Applicant proposes to serve. Based on the undisputed evidence, SouthStar satisfies the Commission's financial capability standards, with the conditions adopted herein.

Proprietary information necessary for the Hearing Officer and the Staff to make their determinations was filed pursuant to the Commission's Trade Secret Rule, 515-3-1-.11. As such, said information was considered in rendering their recommendations and the Commission's decision.

The Commission affirms its findings and conclusions that SouthStar demonstrated sufficient financial and technical capability and should be issued an interim certificate, subject to the conditions set forth in this order.

III. GENERAL CONDITIONS

The Commission is cognizant of the General Assembly's intent to promote competition while protecting the consumer during and after the transition to a competitive natural gas market, to maintain and encourage safe and reliable natural gas service, to deregulate those components of the industry subject to actual competition while continuing to regulate those services subject to monopoly power, and to promote an orderly and expeditious transition of the industry toward competition. O.C.G.A. Section 46-4-151(b). The Commission affirms that certain conditions should be imposed upon all the new certificates of authority in order to attain these legislative goals. For example, all certificates should be issued on an interim basis for a minimum time period necessary for the Applicant to demonstrate twelve months of actual firm gas supply operations, in compliance with applicable laws and rules. Permanent certificate status should be considered only for the AGLC delivery pool groups for which Applicant demonstrates twelve months of active operations. Applicants must apply to the Commission prior to any change in ownership, name change (including doing-business-as (d/b/a) name change), adding or dropping a delivery pool group from service, owning meters, or any other substantial change that would affect their certification.

In addition, any marketer that is found to have engaged in "cramming" or to have switched a customer's service or to have changed the features of a customer's service without that customer's authorization shall be subject to Commission sanctions including, without limitation, the revocation of its certificate. All applicants should be required to pass through discounts to senior citizens who are eligible for the AGLC senior citizen discount program, to the extent that AGLC provides the underlying discounts to the marketers. Consistent with the provisions of O.C.G.A. Section 46-4-160(c) and Commission Rule 515-7-3-.04(3), applicants shall not refuse to sell gas to any potential firm retail customer, including residential customers if the sale can be made by the marketer pursuant to the rules for service authorized by the marketer's certificate of authority and upon terms that will provide the marketer with just and adequate compensation. Applicants are required to maintain current and accurate copies of their sample bills and contracts (including pricing structure) on file with the Commission (see Commission Rule 515-7-3-.03(2)(f)(i)) and to submit monthly reports as required by the Commission's Order in Docket No. 8390-U regarding sales and number of customers by delivery pool group, all subject (to the extent necessary) to the Commission's Trade Secret Rule 515-3-1-.11. Applicants shall be required to fulfill any outstanding request for information from the Staff that may not have been provided as of the date of issuance of the interim certificate, and to provide any other information that may be required by the Commission.

All applicants shall comply with all applicable laws, rules and regulations. For example, all contracts must allow a firm customer to cancel their contract without penalty within forty-eight hours after the customer has signed, and must allow cancellation without penalty if the customer moves outside the delivery pool group (see Commission Rules 515-7-3-.03(2)(f)(i)[d](1) and (2), passed pursuant to the authority of O.C.G.A. Section 46-4-160(a)(2)). Further, Applicant shall be required to make available to randomly assigned customers the same options for rates, terms and conditions of service as the Applicant makes available to its other customers. Marketers with interim or permanent certificates may not avoid their obligations under their certificate conditions, applicable laws, rules and regulations by contracting with intermediary agents whose practices would result in violations of these obligations, or by contracting in any manner that results in customers not receiving the full protection of these obligations. The Commission may revoke a certificate for good cause under the Natural Gas Competition and Deregulation Act, including without limitation a finding that activities of the marketer are serving or could serve to mislead, deceive, or work a fraud upon members of the public under O.C.G.A. Section 46-4-153(e). All applicants must abide by statutory and Commission rule provisions relating to the Universal Service Fund.

IV. ORDERING PARAGRAPHS

The Commission decides, based upon its evaluations and determinations as set forth in the preceding Findings of Fact and Conclusions of Law, and upon the evidence of record, that it is appropriate to certify the Applicant with certain conditions being set upon the certificate.

WHEREFORE, IT IS

ORDERED, that Interim Certificate No. GM-0017 is granted to SouthStar Energy Services, LLC, doing business as Georgia Natural Gas Services, whose principal business address is Two Premier Plaza, Suite 400, 5605 Glenridge Drive, Atlanta, Georgia 30342-1365 to provide firm natural gas marketing services in Georgia in the delivery groups specified below. The Applicant is a resident of Georgia. The certificate of authority shall be issued on an interim basis as a condition of this Certificate. The interim period shall be the minimum time period necessary for the Applicant to demonstrate twelve months of actual firm gas supply operations. During such interim period, the Applicant shall comply with all terms of the Commission's Order in this matter, thereby enabling the Commission and Staff to determine if a permanent certificate of authority is appropriate under the statutes, rules, orders and guidelines of the State of Georgia and the Commission. It is determined that permanent status will be considered only for the delivery groups for which Applicant has demonstrated to the Commission and Staff twelve months of active operations.

ORDERED FURTHER, that as a condition of this certificate of authority that should any of the limited liability principals, to wit: Atlanta Gas Light Services, Inc., Piedmont Energy Company, and Dynegy Hub Services, Inc., for any reason provide

notice to Applicant that the financial support commitment in the Limited Liability Company Agreement between the same in favor of Applicant is being terminated, that Applicant shall give the Commission written notice of such termination within ten (10) days of its receipt and Applicant shall further provide to the Commission, at such time, documentary proof that it has the financial capability to meet its obligations as a natural gas marketer in the State of Georgia.

ORDERED FURTHER, that all applicants must maintain a current listing for a registered office and a registered agent in Georgia on file with this Commission, as well as a current registration with the Georgia Secretary of State to do business in Georgia.

ORDERED FURTHER, that Applicant is hereby granted interim conditional authority to provide firm natural gas services in all the AGLC Georgia delivery groups, to wit: Atlanta, Columbus, Gainesville, Macon, Augusta, Brunswick, Rome, Savannah and Valdosta.

ORDERED FURTHER, that if Applicant seeks to add or drop a delivery pool group from service, Applicant must submit an application for amendment to its certificate to provide services to additional or fewer delivery groups.

ORDERED FURTHER, that if Applicant does not transact any business as a marketer of firm gas supply in one or more pool groups for more than twelve months, Applicant shall file an application to amend or terminate its certificate accordingly with respect to such unserved pool group(s).

ORDERED FURTHER, that if Applicant ceases to do business in Georgia under any name(s) appearing on this certificate, Applicant shall submit an application for amendment to its certificate stating the name or names which Applicant no longer plans to use.

ORDERED FURTHER, that if Applicant desires to change ownership or do business in Georgia under any name which does not appear on this certificate, or proposes any other substantial change that would affect its certification, Applicant shall submit an application for amendment to its certificate describing the change or stating the name(s) under which it plans to conduct business.

ORDERED FURTHER, that during the interim period of this certificate, Applicant must keep current and accurate copies of its sample bills and contracts, including pricing structure, for all firm customers, including residential, on file with the Commission. Sample bills and contracts shall be filed with the Commission within thirty days of any changes being made to the same. To the extent that said information is trade secret, filings may be made pursuant to the Commission's Trade Secret Rule 515-3-1-.11.

ORDERED FURTHER, that the interim certificate herein approved is issued subject to the standards and requirements adopted by the Commission in Docket No. 8390-U and that Applicant shall abide by the provisions relating to the Universal Service

Fund, all Federal laws and all applicable laws under the Official Code of Georgia Annotated, all applicable rules and regulations of the Commission and provisions of pertinent Commission orders currently in effect or which may be promulgated from time to time.

ORDERED FURTHER, that during the interim period of this certificate, the Applicant shall file with the Commission monthly reports as required by the Commission's Order in Docket No. 8390-U, providing the following: composite sales volume and average revenue data by type of customer and delivery group, number of residential customers, number of commercial customers, number of industrial customers (to the extent these customers have firm service demands), total number of customers, therms delivered to residential customers, therms delivered to commercial customers, therms delivered to industrial customers (to the extent therms delivered are not interruptible), total therms delivered in firm service to customers and total therms purchased from suppliers for firm customer demands. If any such information constitutes a trade secret, that limited portion of the information may be filed according to the Commission's Trade Secret Rule 515-3-1-.11. Each report shall be filed on or before the 20th day of each month with data for the preceding month. All information in the monthly reports shall be filed under the Interim Certificate Number and Docket Number associated with the Applicant's interim certificate.

ORDERED FURTHER, that pursuant to O.C.G.A. Section 46-4-153, the certificate granted herein shall be subject to revocation if the Applicant fails to comply with Commission rules, requirements or orders, or violates any applicable law.

ORDERED FURTHER, that if the Commission determines that marketers may own meters, and the Applicant wishes to own meters, Applicant shall submit an application for an amendment to this certificate showing its technical capability to install, remove and safely operate and maintain meters. Such application must comply with any Commission rules that may be in effect regarding meter ownership, and shall include but not be limited to a Department of Transportation certificate for meter ownership.

ORDERED FURTHER, that to the extent AGLC makes available to Applicant a senior citizen discount program, Applicant shall be required, as a condition of this certificate, to pass through all such discounts to its senior citizen customers eligible for such program.

ORDERED FURTHER, that pursuant to Commission Rule 515-7-3-.04(4), Applicant shall not refuse to sell gas to any potential firm retail customer, including residential customers, if the sale can be made by the marketer pursuant to the rules for service authorized by the marketer's certificate of authority and upon terms that will provide the marketer with just and adequate compensation.

ORDERED FURTHER, that Applicant may not avoid its obligations under this certificate, applicable laws, rules or regulations, by contracting with intermediary agents whose practices would result in violations if undertaken by the Applicant, or by

contracting in any manner that results in customers not receiving the full protection of these obligations.

ORDERED FURTHER, that any marketer found to have switched a customer's service or to have changed the features of a customer's service without that customer's authorization shall be subject to Commission sanctions including, without limitation, the revocation of its certificate.

ORDERED FURTHER, that Applicant shall be required to make available to randomly assigned customers the same options for rates, terms and conditions of service as the Applicant makes available to its other customers in the same classes (residential, commercial and, as applicable, industrial).

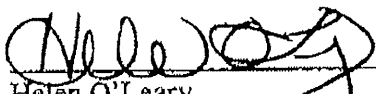
ORDERED FURTHER, that Applicant shall fulfill any outstanding request for information from the Staff within thirty days of this order and shall provide any other information that may be required by the Commission.

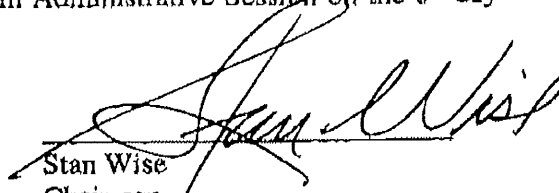
ORDERED FURTHER, that all findings, conclusions and determinations stated in the preceding sections of this order are adopted as findings of fact, conclusions of law, and determinations of regulatory policy of this Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further order or orders as the Commission may deem just and proper.

ORDERED FURTHER, that any motion for reconsideration, rehearing or oral argument, or any other motion shall not stay the effectiveness of this order, unless otherwise ordered by the Commission.

The above by action of the Commission in Administrative Session on the 6th day of October, 1998.


Helen O'Leary
Executive Secretary


Stan Wise
Chairman

Date May 11, 1999

GEORGIA, FULTON COUNTY 5-11-99
Helen O'Leary, Executive Secretary
of the Georgia Public Service Commission, do hereby certify that the foregoing document is a true and correct copy of the original thereof, which is on file with the Commission. Given under my hand and official seal of the Georgia Public Service Commission, this 25 day of September 2000.


Executive Secretary

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Prairie Point Energy, L.L.C. :
: :
Application for Certificate of Service : 05-0814
Authority under Section 19-110 of the :
Public Utilities Act. :

ORDER

By the Commission:

I. INTRODUCTION

On December 16, 2005, Prairie Point Energy, L.L.C. ("Applicant") filed a verified Application with the Illinois Commerce Commission ("Commission") requesting a certificate of service authority to become an alternative gas supplier ("AGS") in Illinois pursuant to Section 19-110 of the Public Utilities Act ("Act"), 220 ILCS 5/1-101 et seq., and 83 Ill. Adm. Code 551 ("Part 551"). On December 31, 2005, Applicant published notice of the Application in the official state newspaper pursuant to Section 19-110(c) of the Act and Section 551.30(a). The Administrative Law Judge ("ALJ") requested additional information relating to various provisions of Part 551, which Applicant provided on December 29, 2005. On January 3, 2006, the Staff of the Commission filed "Staff Concerns About Continued Affiliated Interest Approval."

II. DESCRIPTION OF AND AUTHORITY SOUGHT BY APPLICANT

Applicant is a Delaware limited liability company duly registered with the Illinois Secretary of State and authorized to do business in the State of Illinois. A copy of its Application for Admission to Transact Business filed with the Secretary of State and authorization letter are Attachment A to its Application. Applicant requests authority to serve residential and small commercial gas customers within the service area of Nicor Gas Company beginning in 2006 and in the Peoples Gas Light & Coke Company and North Shore Gas Company territories thereafter. A copy of the notification sent to each of these companies has been provided, pursuant to Section 551.30(c). Applicant does not seek to serve residential customers within a geographic area that is smaller than a gas utility's service area.

III. AGS REQUIREMENTS AND OBLIGATIONS

Applicant certifies that it will comply with all applicable regulations, regional and industry rules, practices, policies, procedures, and tariffs for the use, operation,

maintenance, safety, integrity, and reliability of the interstate natural gas system. Applicant also certifies that it will provide service to residential and small commercial customers that are eligible to take service from an AGS; that it will comply with informational and reporting requirements established by Commission rule; and that it will comply with all other applicable laws and regulations and Commission rules and orders. In addition, Applicant agrees to submit good faith schedules of natural gas deliveries in accordance with applicable tariffs. Applicant also agrees to adopt and follow rules and procedures ensuring that authorizations received from customers, customer billing records, and requests for service transmitted to utilities are retained for a period of not less than two calendar years. Applicant agrees to confidential treatment of customer data. Pursuant to Section 551.50, Applicant has provided a copy of its "License or Permit Bond" in the amount of \$150,000.

Applicant asserts that it meets the financial qualifications set forth in Section 551.80(c). In support of this assertion, Applicant provided a copy of the borrowing agreement with its parent company, Nicor, Inc., and the credit ratings for Nicor Inc. from Standard & Poor's, Moody's Investors Service and Fitch Ratings. Applicant represents that it meets the technical and managerial qualifications set forth in Sections 551.90 and 551.100, respectively. The Application describes the backgrounds of persons who fill technical and management positions with Applicant and includes an organizational chart indicating the relative positions of those persons. Applicant and its affiliate, Nicor Enerchange, LLC, have entered into an Agreement pursuant to which Nicor Enerchange will provide technical assistance relating to the procurement of gas supply.

IV. STAFF'S CONCERNS

Staff, in its filing, states that it brings its concerns to the attention of the Administrative Law Judge in this proceeding simply as a matter of interest that might be brought to the attention of the Commission in connection with the Administrative Law Judge's recommendation on the Application.

Staff indicates that it has become increasingly concerned with the incidents of improper activity between public utilities and their affiliated interests that have been coming to its attention. The Commission is being asked to authorize the formation of affiliates of public utilities that will be conducting business with the utilities directly or indirectly through third parties. It is Staff's opinion that the creation of public utility affiliates that conduct business with the public utility (or third parties that deal with the utility) creates the potential for development of economic incentives in those business relationships that are contrary to the best interests of the utility's ratepayers.

Staff states that it is examining ways in which it may be possible to eliminate, or at least attenuate, the adverse economic impacts of the continued creation of, and business relationships between, affiliates of public utilities and the utilities, on the customers of the public utilities.

Staff is not recommending that this Application for AGS certification be denied. Staff is, however, concerned that the Commission understand that the relatively ministerial action required in this case can exacerbate past problems, as well as the potential for future problems relative to public utilities and their affiliates. Staff is alerting the Commission to the potential for future problems that can arise from actions that today appear quite normal and routine.

V. COMMISSION CONCLUSION

The Commission has reviewed the Application and attachments, along with the supplementary information provided by Applicant, and finds that the Application is in order and satisfies the requirements of the Act and Part 551.

Although Staff makes no recommendation for action at this time, we share Staff's concerns and direct Staff to continue to monitor affiliate relationships and to immediately advise the Commission of any improper activities that come to light. Moreover, the Applicant is directed to comply with all applicable rules and regulations pertaining to affiliates.

The Commission concludes, therefore, that the Application for certification as an AGS should be granted and that the certificate should read as follows:

CERTIFICATE OF SERVICE AUTHORITY

IT IS CERTIFIED that Prairie Point Energy, L.L.C. is granted service authority to operate as an Alternative Gas Supplier as follows:

SERVICE TO BE PROVIDED: The sale of natural gas.

CUSTOMERS TO BE SERVED: All eligible residential and small commercial customers.

GEOGRAPHIC REGIONS SERVED: The service areas of Nicor Gas Company, North Shore Gas Company, and Peoples Gas Light & Coke Company.

VI. FINDINGS AND ORDERING PARAGRAPHS

The Commission, having reviewed the entire record, is of the opinion and finds that:

- (1) Applicant, which is organized under the laws of the State of Delaware, and is authorized to do business in the State of Illinois, seeks authority as an AGS under Section 19-110 of the Act;

- (2) the Commission has jurisdiction over the party hereto and the subject matter hereof;
- (3) the facts recited and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) as required by Section 19-110(e)(1) of the Act, Applicant possesses sufficient technical, financial, and managerial resources and abilities to provide natural gas service to eligible residential and small commercial customers throughout the areas certificated herein;
- (5) Applicant has complied with Section 19-110(e)(2), (3), and (5); and
- (6) Applicant should be granted the Certificate of Service Authority set out in Section V of this Order and should thereafter comply with all applicable Commission rules and orders and any applicable amendments thereto.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that Prairie Point Energy, L.L.C. is hereby granted the Certificate of Service Authority set out in Section V of this Order.

IT IS FURTHER ORDERED that Prairie Point Energy, L.L.C. shall comply with all applicable Commission rules and orders now in effect and as hereafter amended.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By order of the Commission this 8th day of February, 2006.

(SIGNED) CHARLES E. BOX

Chairman

DOUGLAS R. M. NAZARIAN
CHAIRMAN

HAROLD D. WILLIAMS
SUSANNE BROGAN
LAWRENCE BRENNER
THERESE M. GOLDSMITH



PUBLIC SERVICE COMMISSION

#76, 12/22/10 AM; ML#s 126469 and 127086
License Reference No.: IR-2106

December 22, 2010

Trish McFadin
SouthStar Energy Services, LLC
d/b/a Maryland Energy
817 W. Peachtree Street, NW, Suite 1000
Atlanta, GA 30308

Dear Ms. McFadin:

On November 4, 2010, SouthStar Energy Services, LLC d/b/a Maryland Energy filed an Application for a license to supply natural gas or natural gas supply services in Maryland under COMAR 20.54. Additional information was filed on December 3, 2010. The Company proposes to provide natural gas supplier services in Maryland for residential, commercial and industrial customers as described in the application.

After considering this matter at the December 22, 2010 Administrative Meeting, the Commission granted SouthStar Energy Services, LLC d/b/a Maryland Energy a license to supply natural gas or natural gas supply services in Maryland in accordance with its Application (License Reference Number IR-2106). The license granted by the Commission under this Letter Order is limited solely to providing natural gas supplier services to residential, commercial and industrial customers.

Finally, SouthStar Energy Services, LLC d/b/a Maryland Energy is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People's Counsel.

By Direction of the Commission,

A handwritten signature in black ink, appearing to read "Terry J. Romine".

Terry J. Romine
Executive Secretary

TJR/gjd

c: Merwin Sands, Gas Division

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
SOUTHSTAR ENERGY SERVICES LLC)
d/b/a GRAND RAPIDS ENERGY for a license)
as an alternative gas supplier.)
_____)

Case No. U-17228

At the July 11, 2013 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. John D. Quackenbush, Chairman
Hon. Greg R. White, Commissioner
Hon. Sally Talberg, Commissioner

ORDER GRANTING LICENSE

On March 12, 2013, SouthStar Energy Services LLC d/b/a Grand Rapids Energy (SouthStar), applied for a license to operate as an alternative gas supplier (AGS) within Michigan pursuant to 2002 PA 634, MCL 460.9 *et seq.* (Act 634). A redacted application was filed on April 12, 2013. As part of its application, SouthStar provided information to demonstrate compliance with the AGS license requirements under Act 634 and under the Commission's March 12, 2003 order in Case No. U-13694 (March 12 order). That order established the AGS licensing procedure.

Act 634 requires an AGS to have the necessary financial, managerial, and technical capabilities to serve customers within the state of Michigan. The act also requires an AGS to maintain an office within the state. Under the March 12 order, the Commission Staff (Staff) must review the application of the AGS for conformance with the act and with the Commission's orders. The Staff then must recommend appropriate action regarding that application to the

Commission. The Staff reviewed the license application and the information submitted by SouthStar and recommends that this company be granted a license to operate as an AGS in Michigan.

The application shows that SouthStar is a subsidiary of Georgia Natural Gas Company, a wholly-owned subsidiary of AGL Resources, an energy holding company, and Piedmont Energy Company, a wholly-owned subsidiary of the natural gas distribution utility Piedmont Natural Gas Company. SouthStar is licensed to market and serve natural gas to retail residential and commercial customers in Georgia, Ohio, Maryland, New York, Florida, North Carolina, South Carolina, and Tennessee. It currently services approximately 600,000 retail customers in these jurisdictions and has reliably served customers for over 15 years.

SouthStar is a Limited Liability Company organized in Delaware on July 13, 1998, and registered with the Michigan Corporations Division on August 16, 2012, ID # D9321U, with the assumed name of Grand Rapids Energy.

The Staff reviewed SouthStar's personnel descriptions and histories and observes that its key personnel have over 150 combined years of experience in the energy industry from managing and overseeing operations to marketing, sales, and customer service. SouthStar will respond to customer inquiries and complaints in a manner consistent with its proven response protocols through its current customer call center. The Staff has determined that SouthStar is well qualified with sufficient experience and expertise to serve customers in Michigan's Gas Customer Choice Program.

Based on the information provided by SouthStar and the recommendation of the Staff, the Commission finds that SouthStar possesses the appropriate managerial and technical capabilities to serve customers within the state of Michigan.

SouthStar has provided the Staff with a surety bond in the amount of \$100,000. Based on its review of the confidential financial documents, the public U.S. Securities and Exchange Commission filings for AGL Resources, and the satisfied bond requirement, the Staff determined that SouthStar's financial capabilities and availability meet Act 634 requirements. The Commission agrees.

Act 634 requires SouthStar to maintain an office within the state of Michigan. SouthStar has an established office in Lansing, Michigan. The Staff determined that SouthStar has met the office requirements for licensing. The Commission agrees.

Based upon the submissions and all of the information provided, the Commission finds that SouthStar's request to be licensed as an AGS is reasonable and in the public interest, and that it should be approved. However, the grant of the license is conditioned upon compliance with all of the applicable provisions of Act 634, the Commission's orders and administrative rules, and each of the delivering natural gas utilities' tariffs. Failure to comply with any of these provisions may result in revocation of the license or other penalties.

THEREFORE, IT IS ORDERED that:

A. The April 12, 2013 redacted application filed and the requested relief sought by SouthStar Energy Services LLC d/b/a Grand Rapids Energy is approved.

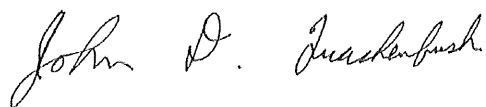
B. SouthStar Energy Services LLC d/b/a Grand Rapids Energy is granted a license as an alternative gas supplier.

C. SouthStar Energy Services LLC d/b/a Grand Rapids Energy shall comply with the regulatory requirements specified in 2002 PA 634, MCL 460.9 *et seq.*; the Commission's orders and administrative rules approved by the Commission; and each of the delivering natural gas utilities' tariffs.


The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, under MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION



John D. Quackenbush, Chairman



Greg R. White, Commissioner



Sally Talberg, Commissioner

By its action of July 11, 2013.



Mary Jo Kunkle, Executive Secretary

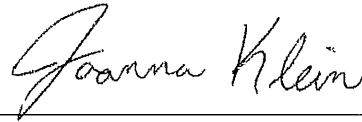
PROOF OF SERVICE

STATE OF MICHIGAN)

Case No. U-17228

County of Ingham)

Joanna Klein being duly sworn, deposes and says that on July 11, 2013 A.D. she served a copy of the attached Commission order by first class mail, postage prepaid, or by inter-departmental mail, to the persons as shown on the attached service list.



Joanna Klein

Subscribed and sworn to before me
This 11th day of July 2013

**Gloria Pearl
Jones**

Digitally signed by Gloria Pearl
Jones
DN: cn=Gloria Pearl Jones, o, ou,
email=jonesg1@michigan.gov,
c=US
Date: 2013.07.11 16:38:55 -04'00'

Gloria Pearl Jones
Notary Public, Ingham County, MI
My Commission Expires June 5, 2016
Acting in Eaton County

Service List U-17228

Varnum, Riddering, Schmidt & Howlett, LLP
The Victor Center, Suite 810
210 N. Washington Square
Lansing MI 48933

SouthStar Energy Services LLC d/b/a Grand Rapids
Energy
120 N. Washington Square, Suite 805
Lansing MI 48933



Chris Christie
Governor

Kim Guadagno
Lt. Governor

STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

Irene Kim Asbury
Secretary to the Board
(609) 292-1599

December 12, 2016

Trish McFadin
Director of Regulatory Affairs
SouthStar Energy Services LLC
817 W. Peachtree Street NW
Suite 1000
Atlanta, Georgia 30308

Re: **Natural Gas Supplier License Renewal**
Dkt. No. GE16030206L

Dear Ms. McFadin:

In accordance with the Electric Discount and Energy Competition Act of 1999, N.J.S.A. 48:3-49 et seq., at its December 12, 2016 Agenda meeting, the New Jersey Board of Public Utilities voted to renew the Natural Gas Supplier License, number GSL-0133, issued to SouthStar Energy Services LLC.

The enclosed license is effective December 12, 2016 and expires on December 11, 2017. This license and the rights thereunder are **Non-Transferable**.

This letter is not an endorsement of, nor is it intended for use in, the marketing promotions of the licensee. Licensees shall comply with all applicable laws and regulations, including the Electric Discount and Energy Competition Act, which prohibits the unauthorized change of a customer's energy provider and other fraudulent and illegal marketing activities.

If you have any questions, please contact Valencia Hunt at (609) 292-0637.

Sincerely,
A handwritten signature in black ink that reads "Irene Kim Asbury".

Irene Kim Asbury
Secretary of the Board

IKA/vch
Encl.(s)

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P. O. Box 350, Trenton, New Jersey 08625-0350

HEREBY LICENSES

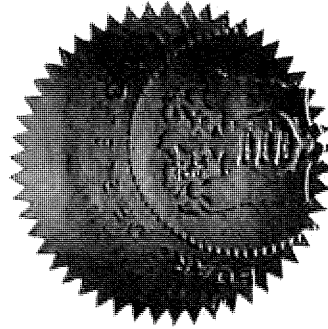
SouthStar Energy Services LLC
d/b/a New Jersey Energy
1085 Morris Avenue
Suite 155
Union, New Jersey 07083

To conduct business in the State of New Jersey as a

Irene Kim Asbury
Natural Gas Supplier

Irene Kim Asbury
Secretary of the Board

License No. GSL-0133
Effective Date: December 12, 2016
Expiration Date: December 11, 2017



STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE
THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

Internet Address: <http://www.dps.state.ny.us>

PUBLIC SERVICE COMMISSION

GARRY A. BROWN
Chairman
PATRICIA L. ACAMPORA
MAUREEN F. HARRIS
ROBERT E. CURRY JR.
JAMES L. LAROCCA
Commissioners



PETER MCGOWAN
General Counsel

JACLYN A. BRILLING
Secretary

October 13, 2010

Mr. Michael A. Braswell
SouthStar Energy Services LLC
dba New York Natural Gas
817 W. Peachtree St., NW
Suite 1000
Atlanta, GA 30308

RE: **SouthStar Energy Services LLC d/b/a New York Natural Gas**
ESCO Code - SSNY

Dear Mr. Braswell:

Thank you for submitting your Retail Access Application Package to become an Energy Services Company (ESCO) serving residential and nonresidential natural gas customers in New York State. This letter is to inform you that documentation submitted in your application package, including sales agreements for the ESCO Referral Programs, have been reviewed by Staff and established to be in compliance with the New York State Public Service Commission's ESCO eligibility requirements that are implemented by codes and regulations found in the Uniform Business Practices, the Home Energy Fair Practices and other applicable regulations.

I am also pleased to notify you that SouthStar Energy d/b/a New York Natural Gas has successfully met the Commission's EDI Phase I certification requirements for Core, Utility Rate and Bill Ready Transactions effective September 13, 2010. All requirements therefore, for this initial stage of your eligibility determination have been satisfied.

Please be advised that you may now continue with the utility approval stage of the eligibility process by contacting those companies in whose service territories you intend to participate. The utility stage normally consists of a creditworthiness determination, completion of Phase III EDI testing and the execution of any operating or billing service agreements. Please note that each utility's eligibility requirements pertain to only their retail access programs.

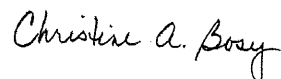
Once you have satisfactorily completed the utility eligibility stage, Staff will be notified by the utility of your success. It would be helpful if SouthStar Energy d/b/a New York Natural Gas notified Staff of the actual production date in the utility service territories you intend to enroll customers. At that point I will confirm that your final eligibility requirements have been satisfied.

Be advised that to maintain your ESCO eligibility, you must notify Staff of any substantive legal, financial or business related changes to your company as they occur. If your business plan changes and you decide to expand your service offerings by choosing to do business in other utility service territories, you must immediately submit the appropriate documentation for Staff review and determination of how it affects your current eligibility.

If you are using vendors to provide ESCO related services (e.g., EDI), the ESCO remains fully responsible for any activities the vendors perform. If you have not already done so, or if you have changed vendors since last reporting them to us, please provide Staff a list with contact information for all vendors that you are now using. ***Finally, you must submit a statement annually, by January 31st, indicating that the information in your original or most recent updated Retail Access Application (RAAF) remains current, or submit a revised RAAF with statement identifying revisions.*** Upon completion of our review of new eligibility information, Staff will then update your eligibility status as necessary.

We will only post your company's contact information on our Website once you have completed the eligibility process and are ready to begin enrolling customers. Please do not hesitate to contact me if you have any further questions or concerns at (518) 486-2432 or Christine_Bosy@dps.state.ny.us.

Sincerely,



Christine A. Bosy
Retail Access Section
Office of Consumer Policy

Cc: Via Email
T. McFadin

The Public Utilities Commission of Ohio
Ohio Competitive Retail Natural Gas Marketer Certificate
Renewal

Issued pursuant to Case Number(s):
07-0378-GA-CRS

is
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:
07-127G(6)

Granted to:
SouthStar Energy Services LLC

Whose office or principal place of business is located at:
817 W Peachtree Street NW, Suite 1000, Atlanta, GA 30308

And is hereby certified to provide:
**Retail Natural Gas Marketer Services, Retail Natural Gas Brokerage Services
and Aggregation**

within the state of Ohio, for a two-year period.


Certification Effective:
May 8, 2017 through May 8, 2019

The certification of Ohio competitive retail natural gas marketers 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: **May 9, 2017**

By Order of
The Public Utilities Commission of Ohio

Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Felecia D. Burdett, Acting Secretary

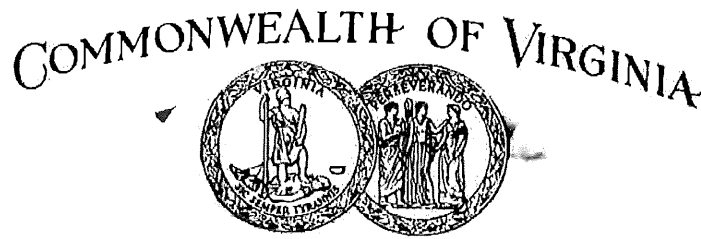
KIMBERLY B. PATE
DIRECTOR

KENT K. PETERSON
DEPUTY DIRECTOR

LAWRENCE T. OLIVER
DEPUTY DIRECTOR

PATRICK W. CARR
DEPUTY DIRECTOR

SCOTT C. ARMSTRONG
DEPUTY DIRECTOR



TYLER BUILDING
1300 EAST MAIN STREET
FOURTH FLOOR B
RICHMOND, VIRGINIA 23219

TELEPHONE: (804) 371-9950
FAX NO.: (804) 371-9447

www.sec.virginia.gov/

STATE CORPORATION COMMISSION
DIVISION OF UTILITY ACCOUNTING AND FINANCE

April 6, 2017

Mr. Eric M. Page, Esquire
Mr. David W. Clarke, Esquire
Eckert Seamans Cherin & Mellot, LLC
919 East Main Street, Suite 1300
Richmond, Virginia 23219

Dear Mr. Page and Mr. Clarke:

By Order dated March 21, 2017, in Case No. PUR-2017-00020, the Commission issued SouthStar Energy Services, LLC, d/b/a Virginia Retail Energy, License No. G-50 authorizing the Company to provide residential, small commercial, large commercial and governmental natural gas services, throughout the Virginia service territory of Washington Gas Light Company. Enclosed is License No. G-50, authorizing participation in the retail access programs as described in the Order.

If you have any questions about this license, please feel free to contact me at (804) 371-9295.

Sincerely,

A handwritten signature in cursive script that reads "Avis Jackson-Prince".

Avis Jackson-Prince

Enclosure

c: Document Control Center

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

LICENSE NO. G-50

SouthStar Energy Services, LLC

is hereby granted this license pursuant to the Code of Virginia to provide only the following products and services:

Natural Gas Service

throughout the Virginia service territory of Washington Gas Light Company to the following customer classes:

Residential
Small Commercial
Large Commercial
Governmental

This license is granted pursuant to the State Corporation Commission's Order Granting License dated March 21, 2017, in Case No. PUR-2017-00020, and incorporates all terms, conditions or restrictions set forth therein, or as subsequently amended.

This license is not valid authority for the provision of any product or service not identified herein to any customer.

Failure of the licensee to comply with any applicable Federal Energy Regulatory Commission or State Corporation Commission Orders and/or Rules and all state and federal laws may result in the revocation, suspension or modification of this license, the imposition of appropriate fines and/or penalties, or additional actions may be taken as necessary to protect the public interest.

Dated at Richmond, Virginia _____ March 21, 2017 _____

STATE CORPORATION COMMISSION

By  Commissioner

APPLICATION FOR REGISTRATION FOREIGN LIMITED LIABILITY COMPANY

FILED IN OFFICE
FEB 5 1999
FEB 5 1999
SECRETARY OF STATE

1 NAME: SouthStar Energy Services, LLC

REGISTERED NAME: SouthStar Energy Services, LLC

2. STATE OF FORMATION: Delaware DATE: July 1, 1998

ADDRESS OF PUBLIC OFFICE WHERE ARTICLES OF ORGANIZATION ARE FILED:
5607 Glenridge Drive, Suite 400
Atlanta, GA 30342

3. NATURE OF BUSINESS TO BE TRANSACTED IN ALABAMA:
Wholesale & Retail sales of Natural Gas and Propane

4. NAME AND ADDRESS OF AGENT FOR SERVICE OF PROCESS (Must be street address):
The Corporation Company
2000 Interstate Park Drive, Suite 204, Montgomery, AL 36109

5. ADDRESS OF PRINCIPAL OFFICE
5607 Glenridge Drive, Suite 400
Atlanta, GA 30342

6. THE ABOVE NAMED FOREIGN LIMITED LIABILITY COMPANY CONSENTS TO SERVICE OF PROCESS ON IT BY REGISTERED MAIL ADDRESSED TO THE FOREIGN LIMITED LIABILITY COMPANY AT THE OFFICE REQUIRED TO BE MAINTAINED IN THE STATE OF ORGANIZATION BY THE LAWS OF THAT STATE OR, IF NOT SO REQUIRED, AT THE PRINCIPAL OFFICE OF SUCH LIMITED LIABILITY COMPANY, IF THE AGENT SO APPOINTED ABOVE CANNOT BE FOUND OR SERVED WITH THE EXERCISE OF REASONABLE DILIGENCE.

IN WITNESS THEREOF, THIS 19th DAY OF January, 1999 AT
Atlanta, Georgia

(CITY & STATE)
Clayton H. Preble
(SIGNATURE OF AUTHORIZED MEMBER)

Clayton H. Preble,

Mail completed form and one copy with \$75.00 fee to:

Secretary of State
Corporate Section
P.O. Box 5816
Montgomery, Alabama 36103-5616
(205) 242-5324

983285151

State of North Carolina
Department of the Secretary of State

0-0489014

FILED

4:56am

MAR 24 1999

APPLICATION FOR CERTIFICATE OF AUTHORITY
FOR LIMITED LIABILITY COMPANY

EFFECTIVE
ELAINE F MARSHALL
SECRETARY OF STATE

Pursuant to §57C-7-04 of the General Statutes of North Carolina, the undersigned limited liability company hereby applies for a Certificate of Authority to transact business in the State of North Carolina, and for that purpose submits the following:

1. The name of the limited liability company is SouthStar Energy Services LLC;

and if the limited liability company name is unavailable for use in the State of North Carolina, the name the limited liability company wishes to use is SouthStar Energy Services LLC

2. The state or country under whose laws the limited liability company was organized is: Delaware

3. The date of organization was July 1, 1998; its period of duration is: Perpetual

4. The street address of the principal office of the limited liability company in the state or country under whose law it is organized is:

Number and Street 1209 Orange Street

City, State, Zip Code Wilmington, DE 19801

5. The mailing address *if different from the street address* of the principal office of the limited liability company in the state or country under whose law it is organized is:

6. The street address and county of the registered office in the State of North Carolina is:

Number and Street 225 Hillsborough Street

City, State, Zip Code Raleigh, NC 27603 County Wake

7. The mailing address *if different from the street address* of the registered office in the State of North Carolina is:

8. The name of the registered agent in the State of North Carolina is: C.T. Corporation System

APPLICATION FOR CERTIFICATE OF AUTHORITY

Page 2

9. The names, titles, and usual business addresses of the current managers of the limited liability company are:
(use attachment if necessary)

Name

Business Address

*** AGL Resources, 303 Peachtree St., NE, Atlanta, GA 30308
Dynegy 1000 Louisisana, Suite 5800, Houston, TX 77002
Piedmont Natural Gas, 1915 Rexford Rd., Charlotte, NC 28233

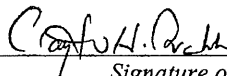
*** Clayton H. Preble, Vice President AGL Resources

10. Attached is a certificate of existence (or document of similar import), duly authenticated by the secretary of state or other official having custody of limited liability company records in the state or country of organization. **The Certificate of Existence must be less than six months old.**
11. If the limited liability company is required to use a fictitious name in order to transact business in this State, a copy of the resolution of its managers adopting the fictitious name is attached.
12. This application will be effective upon filing, unless a delayed date and/or time is specified: _____

This the 2nd day of December, 1998

SouthStar Energy Services LLC

Name of Limited Liability Company



Signature of Manager

Clayton F. Preble, Sr. Vice President

Type or Print Name

Notes:

1. Filing fee is \$250. This document and one exact or conformed copy of this application must be filed with the Secretary of State.

(Revised May, 1998)

(Form L-09)

CORPORATIONS DIVISION

300 N. SALISBURY ST.

RALEIGH, NC 27603-5909

Office of the Secretary of State

I, EDWARD J. FREEL, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "SOUTHSTAR ENERGY SERVICES LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-SECOND DAY OF MARCH, A.D. 1999.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE NOT BEEN ASSESSED TO DATE.



A handwritten signature in cursive script, reading "Edward J. Freel".

Edward J. Freel, Secretary of State

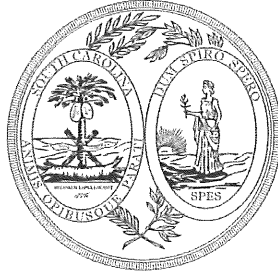
2919954 8300

991109393

AUTHENTICATION: 9640207

DATE: 03-22-99

The State of South Carolina



Office of Secretary of State Mark Hammond

Certificate of Authority

I, Mark Hammond, Secretary of State of South Carolina Hereby Certify that:

SOUTHSTAR ENERGY SERVICES, LLC, a limited liability company duly organized under the laws of the State of Delaware, and issued a certificate of authority to transact business in South Carolina on April 5th, 1999, with a duration that is at will, has as of this date filed all reports due this office, paid all fees, taxes and penalties owed to the State, that the Secretary of State has not mailed notice to the company that it is subject to being dissolved by administrative action pursuant to S.C. Code Ann. §33-44-1006, and that the company has not filed a certificate of cancellation as of the date hereof.

Given under my Hand and the Great Seal
of the State of South Carolina this 20th day
of September, 2018.


Mark Hammond, Secretary of State

SENT BY: ATLANTA ; 3-30-99 ; 1:48PM ; C T CORPORATION
CERTIFIED TO BE A TRUE AND CORRECT COPY
AS TAKEN FROM AND COMPARED WITH THE ORIGINAL ON FILE IN THIS OFFICE

Jim Miles
SECRETARY OF STATE
FILED
APR 05 1999
AM
1 2 3 4 5 6

Sep 20 2018
REFERENCE ID: 214598

Mark Hammond
SECRETARY OF STATE OF SOUTH CAROLINA

**STATE OF SOUTH CAROLINA
SECRETARY OF STATE
JIM MILES**

**APPLICATION FOR A CERTIFICATE OF AUTHORITY
BY A FOREIGN LIMITED LIABILITY COMPANY
TO TRANSACT BUSINESS IN
SOUTH CAROLINA**

The following foreign limited liability company applies for a certificate of authority to transact business in South Carolina in accordance with § 33-44-1002 of the 1976 South Carolina Code, as amended.

1. The name of the foreign limited liability company which complies with § 33-44-1005 of the 1976 South Carolina Code as amended is SouthStar Energy Services, LLC
2. The state or country under whose laws the limited liability company is organized is Delaware
3. The street address of the limited liability company's principal office is:
5607 Glenridge Drive, Suite 400
Street Address
Atlanta, GA 30342
City State Zip Code
4. The street address of the limited liability company's designated office in South Carolina is: c/o C T CORPORATION SYSTEM
75 Beattie Place, Two Insignia Financial Plaza
Street Address
Greenville 29601
City Zip Code
5. The street address of the limited liability company's initial agent for service of process in South Carolina is:
75 Beattie Place, Two Insignia Financial Plaza
Street Address
Greenville 29601 City Zip Code
and the name of the limited liability company's agent for service of process at that address is: C T CORPORATION SYSTEM

(S.C. - LLC 3226 - 8/22/96)
CT FORM

6. Check this box if the duration of the company is for a specified term, and if so, the period specified: Perpetual

Sep 20 2018

REFERENCE ID: 214598

7. Check this box if the company is manager-managed, and if so list the name and of each initial manager:

Mark Hammond
SECRETARY OF STATE OF SOUTH CAROLINA

- a. AGL Resources
Name
303 Peachtree St., NE
Business Address
Atlanta, GA 30308
City State Zip Code
- b. Piedmont Natural Gas
Name
1915 Rexford Road
Business Address
Charlotte, NC 28233
City State Zip Code
- c. Dynegy
Name
1000 Louisiana, Suite 5800
Business Address
Houston, TX 77002
City State Zip Code
- d. _____
Name

Business Address

City State Zip Code

8. Check this box if one or more members of the foreign limited liability company are to be liable for the company's debts and obligations under a provision similar to § 33-44-303(c) of the 1976 South Carolina Code, as amended.

Date 3-30-1999

Clayton H. Treble
Signature

Clayton H. Treble
Name Capacity

Senior Vice President

Managing Member AGL Resources

CERTIFIED TO BE A TRUE AND CORRECT COPY
AS TAKEN FROM AND COMPARED WITH THE
ORIGINAL ON FILE IN THIS OFFICE

State of Delaware

PAGE 1

Sep 20 2018
REFERENCE ID: 214598

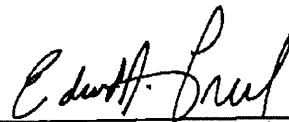
Office of the Secretary of State


SECRETARY OF STATE OF SOUTH CAROLINA

I, EDWARD J. FREEL, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "SOUTHSTAR ENERGY SERVICES LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-NINTH DAY OF MARCH, A.D. 1999.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE NOT BEEN ASSESSED TO DATE.





Edward J. Freel, Secretary of State

2919954 8300

991121979

AUTHENTICATION: 9656807

DATE: 03-29-99



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

BARBARA CHRISTOPHER
TEN PEACHTREE PLACE NE
ATLANTA, GA 30309

September 20, 2018

Request Type: Certificate of Existence/Authorization

Request #: 0290006

Issuance Date: 09/20/2018

Copies Requested: 1

Document Receipt

Receipt #: 004296317

Filing Fee: \$20.00

Payment-Credit Card - State Payment Center - CC #: 3740112193

\$20.00

Regarding: SOUTHSTAR ENERGY SERVICES LLC

Filing Type: Limited Liability Company - Foreign

Control #: 368710

Formation/Qualification Date: 04/05/1999

Date Formed: 07/01/1998

Status: Active

Formation Locale: DELAWARE

Duration Term: Perpetual

Inactive Date:

CERTIFICATE OF AUTHORIZATION

I, Tre Hargett, Secretary of State of the State of Tennessee, do hereby certify that effective as of the issuance date noted above

SOUTHSTAR ENERGY SERVICES LLC

* is a Limited Liability Company formed in the jurisdiction set forth above and is authorized to transact business in this State;

* has paid all fees, interest, taxes and penalties owed to this State (as reflected in the records of the Secretary of State and the Department of Revenue) which affect the existence/authorization of the business;

* has filed the most recent annual report required with this office;

* has appointed a registered agent and registered office in this State;

* has not filed an Application for Certificate of Withdrawal.

Tre Hargett
Secretary of State

Processed By: Cert Web User

Verification #: 029633530

Attachment 8. Technical Fitness

d. Oversight of Marketing

SouthStar oversees its marketing process and employees or agents engaged in marketing activities in several ways. It requires annual ethics training for all employees, which now includes applicable marketing in Pennsylvania. For its agents, SouthStar's standard contracting practice is to include non-disclosure and confidentiality provisions in contracts with any third parties that have access to customer information. SouthStar's contracts with its agents may include the following additional requirements:

- Confidentiality provisions
- Training requirements
- Security and background check requirements
- Service level agreements and reporting
- Insurance requirements
- Slamming policy and acknowledgement

SouthStar's marketing department is responsible for implementing programs designed to educate customers about SouthStar's product and service offerings as well as the benefits of being a customer of SouthStar. All customer communications are reviewed internally and approved by multiple departments to ensure our messages are factual, accurate and compliant with governing rules.

The attached Code of Conduct is part of SouthStar's training documentation provided to its employees and agents, including those engaged in marketing activities.

SouthStar Energy Services LLC Code of Conduct

SouthStar (Pennsylvania Energy) is committed to conducting its business affairs with the highest standards of honesty and integrity. We expect you to conduct yourself in a business-like and professional manner. You must ensure that the company's business operations are conducted in a manner consistent with the Southern Company Gas Code of Ethics, available at www.southerncompanygas.com. Examples of such conduct include, but are not limited to the following:

- Conducting business in an honest and ethical manner and encouraging the same ethical behavior in others
- Maintaining an appropriate level of confidentiality of company, employee, and customer information
- Complying with all policies, procedures, and applicable laws and regulations
- Treating others in a professional, courteous, and respectful manner
- Refraining from behavior or conduct deemed offensive or undesirable, or which would bring the reputation of our company into question

For our vendors, to the extent your employer has a code of conduct; you should follow that code, as well.

Code of Ethics



Our Code of Ethics

It guides behavior and makes Our Values come to life every day. These ethical guidelines apply to all of us, and remind us that *how* we do our jobs is just as important as *what* we do.

The Code of Ethics brochure also shares:

- Our Values
- A guide to ethical decision making, and
- Information about the Concerns Program

You can find FAQs, policies and related information at coe.southernco.com or on your mobile device through the Code of Ethics app in the company App Catalog. You can also talk to your supervisor when you need more help.

By working together, we can make Southern Company a great place to work.

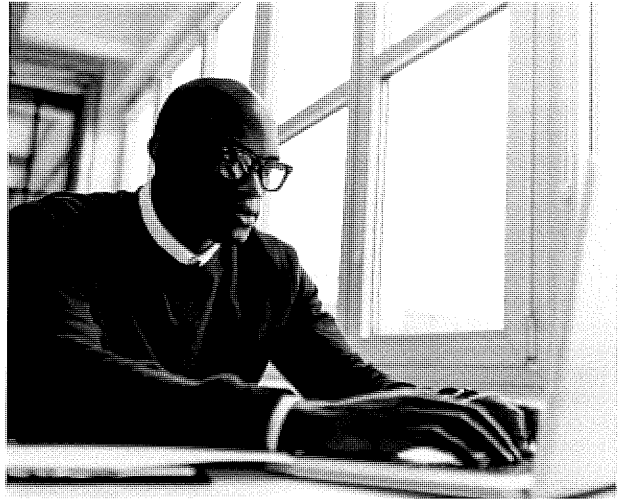
Safety and Health

We work safely, and we watch out for each other. Our goal is for everyone to go home healthy, every day. We do not compromise on safety. We complete required training, and we report and correct unsafe situations.

We keep our workplace safe for the well-being of employees, customers, contractors and the public.



We also keep our workplace and work sites free from violence and prohibit the inappropriate use of alcohol and drugs.



Our Employees

Our employees make this a great place to work. We work together as a team, and everyone contributes to our success. We recognize and reward performance.

We treat each other with fairness, respect and dignity. We value and encourage different ideas and points of view. Inclusion and diversity are strengths that unlock our full potential.

We are an equal opportunity employer. We do not tolerate inappropriate conduct, intimidation, harassment or discrimination on any basis, including race, color, religion, sex, national origin, age, disability, veteran status, genetic information, sexual orientation, or gender identity or expression.

Our Relationships

We are known for the quality and value of our customer service. We tell the truth, keep our promises and deal fairly and ethically with others. Our goal is to establish and maintain relationships built on trust.

This goal guides all our business decisions. It extends to our customers, employees, vendors, contractors, regulators, stockholders and neighbors. We work to preserve the highest standards of integrity and objectivity. We expect our business partners to operate with ethical standards and values similar to our own.

The Environment

We take our environmental compliance responsibilities seriously. We support environmental stewardship efforts that protect and preserve our natural resources. The communities we serve are also home to our families and we strive to make them better.

Compliance with Laws and Regulations

Our reputation for doing the right thing is a valuable asset.

We respect and comply with all laws and regulations. We also comply with company policies and the Code of Ethics. We provide training and resources to meet these expectations.

Financial Integrity

We are prudent with company funds. All business records and accounts will be complete, accurate and based on proper accounting principles. The records will be maintained as required by law and company policies. Any attempt to conceal, omit or make false entries in the records will not be tolerated.

We maintain appropriate internal controls to prevent and detect fraud. We will make full, fair, correct and timely disclosures in financial reports and other public communications.

Conflict of Interest

We avoid conflicts of interest. Our goal is to avoid even the appearance of a conflict between our work and personal interests.

Company resources are for business purposes and company-approved activities. We do not use our position, company resources or information for personal benefit. We do not compete with the company using personal or outside businesses. Any potential conflicts of interest must be disclosed promptly to management.

Gifts and Entertainment

We do not approve, accept or offer gifts, entertainment, or other favors unless they are a part of a reasonable business relationship. We use good judgment in offering hospitality to others to help preserve our reputation and that of our business partners. All gifts or entertainment given or accepted must be in compliance with all applicable laws and company policy.

Competitive Practices

We compete fairly, and vigorously, on the basis of price, superior service and value. We do not restrain trade, competition, prices, terms or markets.

We market, advertise and collect market data, fairly and honestly.

Confidential Information

We respect and protect the confidential information of our company, customers, employees, vendors and partners. We do not use confidential information in ways that conflict with laws, regulations or contracts.

We comply with copyright, patent and trademark rights.



Political Activities

We value and encourage citizenship. Employees have the freedom to choose whether or not to support political candidates, parties or positions, or to engage in political activities. The company will not tolerate pressuring employees to participate in political activities. Company resources will not be used to support political candidates, parties or committees unless permitted by law and company policy, and when approved in advance by executive management.

We do not offer or provide gifts or entertainment of any type, including meals and transportation, to any government employee or public official in the United States or internationally unless doing so is appropriate and legal. We never offer bribes or kickbacks.

Federal and state rules regarding gifts and entertainment for public officials and government employees can vary widely. This is also true when dealing with international businesses.

Duty to Act

All employees have a duty to act. We must promptly report any suspected violation of this Code, company policies or any applicable laws or regulations.

There are many ways employees can report issues – even anonymously. We investigate concerns and take appropriate action. Employees are expected to cooperate in investigations. The company does not tolerate retaliation in any form, against anyone who fulfills their duty to act.

Issues about questionable accounting practices, violations of internal accounting controls or auditing matters may be reported directly to the Southern Company Audit Committee.

Conclusion

Ethics means more than just obeying laws and following policies. It means taking personal responsibility to speak out when we see a possible violation of the Code.

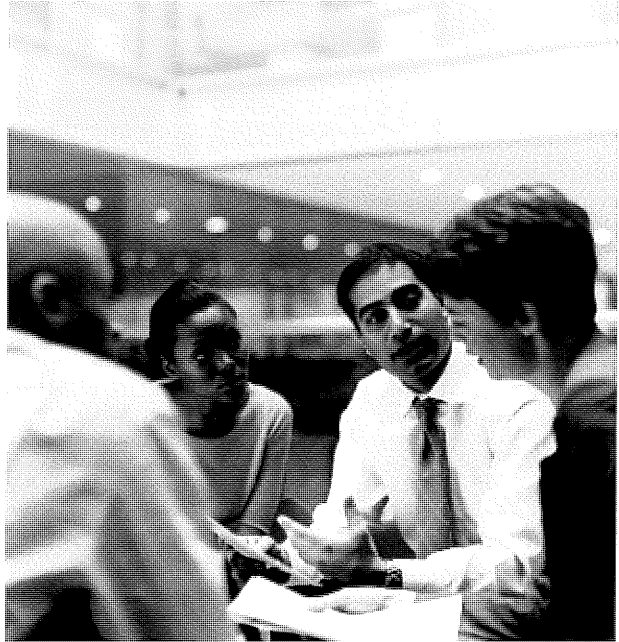
Our Values and Code of Ethics challenge us to inspire and help others to act ethically. We should make the most of every opportunity to model the values and behavior that make this a great place to work.

This Code of Ethics applies to all employees, officers and board members of Southern Company, its subsidiaries and affiliates.

Annually, all employees are required to certify they received, read and will abide by the Code of Ethics, including their duty to act.

No waivers of the provisions of this Code of Ethics may be granted to board members, officers or employees without authorization from the appropriate compliance officer or in certain circumstances the Southern Company Board of Directors. Waivers will be disclosed as required by applicable law, regulation or rule.

This Code of Ethics is a statement of policies for individual and business conduct and does not create any contractual right to current or future employment, employee benefits, or other terms and conditions of employment.



Ethical decision-making

Talking to your manager and asking the right questions can lead to sound, ethical decisions.

Do I have all the information I need?

- You cannot make good decisions without the facts. That may mean asking questions rather than making assumptions or asking others for help.

Does it violate a law, regulation or company policy?

- Ethical conduct means playing by the rules. When in doubt, look up the policy and seek guidance for any legal questions.

How will this decision impact the company's reputation and my own reputation?

- How would it look in the newspaper? Would you be proud to tell your children or parents? If you're in doubt, it may not be the right decision.

Concerns Program

Our Values and Code of Ethics call on us to act with honesty, respect, fairness and integrity. But when that doesn't happen, the Concerns Program is a resource to report a wide range of illegal or unethical behaviors. All Southern Company system employees and contractors can use the program.

It's best to speak with your supervisor first, but if that's not possible you can contact the Concerns Program one of several ways – even anonymously.



Call the confidential hotline at 1-800-754-9452.



File a concern online at www.mycompliancereport.com
(Access ID: SCO)



Mail a letter.
Southern Company Concerns Program
P.O. Box 54384
Atlanta, GA 30308-9998



Send an email to Concerns at concerns@southernco.com



Contact your company's Concerns manager directly.

Whichever method you choose, your concern will be investigated quickly and objectively, and appropriate corrective action will be taken when necessary. All concerns are treated confidentially and the company does not tolerate retaliation against anyone for filing a concern.

You can find FAQs, policies and related information at coe.southernco.com or on your mobile device through the Code of Ethics app in the company App Catalog. You can also talk to your supervisor when you need more help.

Our Values

In 2016 we updated our corporate values, known simply as Our Values. These tenets will continue to drive our future success as they guide us in defining who we are and how we operate as a business.

For more than a century, Southern Company has been building the future of energy. We deliver the energy resources and solutions our customers and communities need to drive growth and prosperity.

How we do our work is just as important as what we do. Our uncompromising values are key to our sustained success. They guide our behavior and ensure we put the needs of those we serve at the center of all we do.

At Southern Company, Our Values will guide us to make every decision, every day, in the right way.

Safety First

We believe the safety of our employees and customers is paramount. We will perform and maintain every job, every day, safely.

Unquestionable Trust

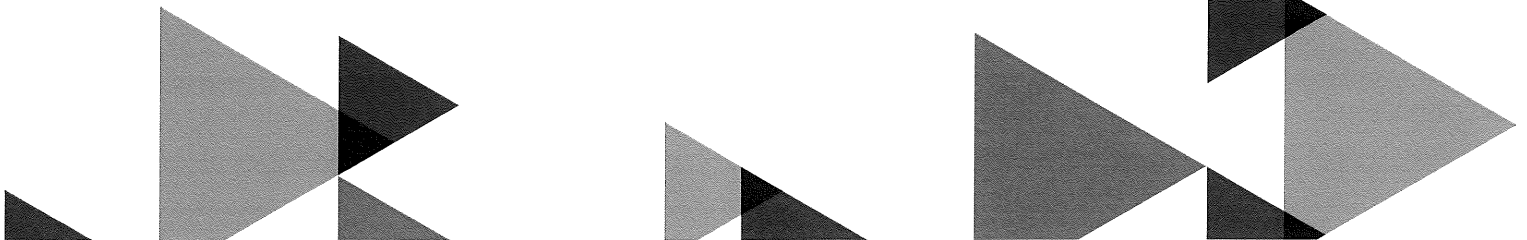
Honesty, respect, fairness and integrity drive our behavior. We keep our promises, and ethical behavior is our standard.

Superior Performance

We are dedicated to superior performance throughout our business. We will continue our strong focus on innovative solutions, improving how we run our business and our commitment to environmental stewardship.

Total Commitment

We are committed to the success of our employees, our customers, our shareholders and our communities. We fully embrace, respect and value our differences and diversity.



Attachment 8. Technical Fitness

e. Officers and Resumes

The chief officers of SouthStar Energy Services LLC D/B/A Pennsylvania Energy are as follows:

Michael A. Braswell, President and Chief Executive Officer (see attached resume)

John Jamieson, Senior Vice President, Retail Operations (see attached resume)

Michael Nieman, Senior Vice President, Commercial Operations (see attached resume)

Michael Braswell

President, Retail Energy, Southern Company Gas
President and CEO, SouthStar Energy Services LLC

Mr. Braswell has over 30 years' experience in the natural gas industry.

December 2011 – Present

Michael Braswell was named President, Retail Energy for Southern Company Gas, f/k/a AGL Resources and President and CEO for SouthStar Energy Services in December 2011. He is responsible for ensuring the expansion and continued success of Southern Company Gas' retail energy operations in multiple states.

2008 - 2011

Mr. Braswell served as CEO for SouthStar Energy where he oversaw the expansion and continued success of the enterprise.

2003 – 2008

Mr. Braswell served as President, SouthStar Energy Services where he oversaw the continued success of the enterprise.

1998 - 2003

Mr. Braswell held numerous positions within SouthStar including EVP and COO, VP Retail Markets and VP Customer Service and Strategic Planning. These roles reflected increasing responsibilities across the enterprise which ultimately led to the oversight of all operational aspects of the business including; risk and asset management, physical and financial trading, marketing, sales and customer operations.

1988 – 1998

Mr. Braswell held various key positions over a 10-year period with Southern Company Gas, working in marketing, sales management, rates and strategic planning.

Mr. Braswell earned his Master of Business Administration degree from Georgia State University with a concentration in Finance and his undergraduate Industrial Engineering degree from the Georgia Institute of Technology.

Mr. Braswell lives in Atlanta, Georgia, with his wife and four children.

John Jamieson

Vice President, Retail Energy Operations, Southern Company Gas and
Senior Vice President, SouthStar Energy Services

Mr. Jamieson has been with SouthStar Energy Services since inception in 1998. He brings more than 25 years of gas industry experience to his current position.

2007 – Present

Since 2007 John Jamieson has served as Vice President, Retail Operations, Southern Company Gas (formerly AGL Resources) and Senior Vice President, SouthStar Energy. In his roles, Mr. Jamieson has profit and loss (“P&L”) responsibility as well as operational responsibility for retail energy marketing, sales, billing, customer service and business process outsourcing.

2003 – 2007

Mr. Jamieson served as Vice President, Retail Operations, with substantially the same P&L and operational responsibilities as above, excluding marketing.

2002 – 2003

Mr. Jamieson served as Managing Director, Retail Operations, with substantially the same P&L and operational responsibilities as above.

1998 - 2002

From 1998 to 2002, he served in strategic planning, market development, business analysis and operations roles at SouthStar Energy Services.

1991-1998

From 1991 to 1998, Mr. Jamieson served AGL Resources and Atlanta Gas Light in various engineering and marketing roles, where he was responsible for identifying, evaluating and leveraging a variety of non-traditional revenue streams and marketing new energy-related technologies.

Mr. Jamieson currently serves on the board of advisors for the Metro Atlanta Chamber of Commerce. In addition, he has served on a number of non-profit boards. Mr. Jamieson earned his Master of Business Administration degree from Georgia State University and his Bachelor of Science in Electrical Engineering from Clemson University.

Michael Nieman

Vice President, Risk & Asset Management, Southern Company Gas Retail Energy
Senior Vice President, Commercial Operations, SouthStar Energy Services

Mr. Nieman has over 25 years' experience in the natural gas industry.

December 2011 – Present

Michael Nieman was named Vice President, Retail Energy for Southern Company Gas, f/k/a AGL Resources and Senior Vice President, Commercial Operations for SouthStar Energy Services in December 2011. He is responsible for all physical and financial trading to support the company's commercial asset optimization and risk management strategies.

2006 - 2011

Mr. Nieman served as Senior Vice President of Commercial Operations for SouthStar Energy where he oversaw the physical and financial trading, commodity, basis and weather risk management and the structuring functions within the Company.

2003 – 2006

Mr. Nieman served as Vice President of Commercial Operations for SouthStar Energy Services where he oversaw physical trading, risk management and origination.

1996 - 2003

Mr. Nieman held numerous positions within SouthStar, including Managing Director of Commercial Operations, Director of Industrial Markets, Manager of Business Development and Manager of Liquid Fuels. In each of these roles he had P&L and personnel management responsibilities. Additionally, he served on an internal team that developed the business plan that led to the creation of a \$1 billion market valuation enterprise that would become SouthStar Energy.

1994 – 1996

Mr. Nieman served as a Rate Analyst within the Corporate Development & Rates department of Atlanta Gas Light Company. His primary responsibility was to manage and track ~\$50 million of rates and associated revenue from Interruptible customers on the Atlanta Gas Light system as physical bypass became a major risk to the Company.

1993 – 1994

Mr. Nieman started his 25-year career in the natural gas industry as a Rate Analyst at the Municipal Gas Authority of Georgia where he provided financial analysis to 23 municipal LDC's in Georgia and Alabama for the purposes of setting rates and establishing operating budgets.

Mr. Nieman earned his Master of Business Administration degree from Mercer University with a concentration in Finance and his undergraduate degree from Florida State University with a concentration in Economics.

Mr. Nieman lives in Lilburn, Georgia, with his wife and four children.

Attachment 9. Disclosure Statement



Pennsylvania Energy Disclosure Statement

March 2019

This Disclosure Statement is an agreement for natural gas services between Pennsylvania Energy ("PE") and you, the customer, <<customer's name and full address>>. PE is licensed by the Pennsylvania Public Utility Commission ("PAPUC") to offer and supply natural gas services in Pennsylvania. Our PAPUC license number is (A-XXXX-XXXXXXX). Commodity prices and charges are set by the natural gas supplier (in this case PE) you have chosen. The PAPUC regulates distribution or delivery prices and services. You will receive a single bill from your Natural Gas Distribution Company, <<LDC Name>> ("NGDC"), that will contain your NGDC charges, your PE charges and applicable taxes.

By receiving or continuing to receive service from PE, you are agreeing to be bound by the terms and conditions of service as set forth below, including provisions regarding Binding Arbitration, and in your Natural Gas Supplier Contract Summary, welcome letter and other enrollment correspondence (collectively, your "contract"). **Please review the general sections that apply to all price plans, as well as sections that apply to the specific price plan you are enrolled in, to ensure that you understand each provision.**

THIS DISCLOSURE STATEMENT IS A CONTRACT THAT AFFECTS YOUR RIGHTS. PLEASE REVIEW IT CAREFULLY. In particular, please review the Binding Arbitration agreement set forth on Page 5 below. It requires you to resolve any disputes with PE through the Pennsylvania Public Utility Commission (PAPUC) formal or informal complaint process, in small claims court, or through individual Binding Arbitration. You will not be allowed to resolve any disputes with PE through a jury trial or a class action.

Right of Rescission– You may cancel this agreement at any time without penalty within three (3) business days after receipt of this Disclosure Statement. You may contact PE by phone at 1-866-425-6220, by mail at P.O. Box 78760 Atlanta, Georgia 30357 or by e-mail at customerservice@pennsylvaniaenergy.com.

Definitions –

Commodity Charges – The charges for basic gas supply service which is sold either by volume (Ccf or Mcf) or heating value (Dekatherms).

Distribution Charges - The charges for the delivery of natural gas from the point of receipt into the NGDC's system.

Natural Gas Service Terms of Service –

Your contract specifies your price plan, per unit price, and other pricing terms, if you have selected a fixed or variable plan. PE's price plans fall into two categories: (1) variable price and (2) fixed price. PE offers residential pricing for residential customers and commercial pricing for commercial customers.

The price per Mcf or Ccf, whichever is applicable based on your NGDC, includes natural gas commodity charges, and estimated Total State Taxes, but excludes applicable state and local Sales Tax, as well as NGDC charges. For new customers, switching fees may apply under the NGDC's tariff.

The NGDC will deliver the natural gas you purchase from PE to your premises, read your meter, provide emergency services, and issue your bill each month. The NGDC will charge you separately for those services. PE's charges for natural gas supply service will appear as a separate line item on your bill. Sales tax will appear separately.

Our contract, regardless of which plan or duration you choose, governs your pricing with PE during the term of your contract, but the timing of application of those prices to your NGDC bill may be impacted by the timing of your NGDC meter read cycles. In addition, because meter read cycles may differ from the start and end dates of your fixed price plan contract, you may not receive the same number of bills as the number of months in your contract with PE. In other words, because of the NGDC meter read cycles, the actual term of your contract could be longer or shorter than the term specified in your contract.

1. Basic Service Prices

Fixed Price Plans: With a PE fixed price plan, PE charges you a fixed price per unit during the term of the contract. If you enrolled on a fixed price plan, your price for your natural gas commodity will be set forth in your Contract Summary. Your price includes natural gas commodity charges and estimated total state taxes but excludes applicable state and local sales tax and does not include NGDC distribution or billing charges.

With a fixed price plan, PE charges you a fixed price per unit during the term of the contract. When you select a fixed price plan, you commit to remain with PE at the same price for the term of your contract. Although PE's currently available fixed price may change at any time, the price for the term of your contract will be PE's fixed price in effect at the time you selected your fixed plan. The per-unit price on a fixed plan may be higher or lower than on another plan, and your price may be higher than the NGDC price.

Variable Price Plans: With a PE variable price plan, your price will change or remain the same from month to month. Your price includes natural gas commodity charges and estimated total state taxes but excludes applicable state and local sales tax and does not include NGDC distribution or billing charges. If you enrolled on a variable price plan, your price for the first billing period will be set forth in your Contract Summary. You will see each month's variable price on your bill and will not receive advance notification of price changes. There is no limit on the variability of a variable price from one month to the next.

Many factors influence retail natural gas pricing, including without limitation the cost to PE to obtain natural gas on your behalf, including, but not limited to, commodity, capacity, storage, balancing, transportation to the Delivery Point; operating expense; all applicable taxes, fees, charges or other assessments, and PE's costs, expenses and profit margins; and other factors. PE sets its prices each month based on the most current information available.

PE cannot predict the volatility of the market or what its customers will pay for gas in the future.

Service under a variable price plan is on a month-to-month contract basis until cancelled by you or PE.

Under a variable price plan, you may switch to another PE price plan for which you qualify at any time at no additional charge. The per-unit price on a variable price plan may be higher or lower than on another plan, and your price may be higher than the NGDC price.

More information about this variable price product, including what this price has been for the past 24 months, as applicable, can be found at www.pennsylvaniaenergy.com or you may call us at 1-866-425-6220. However, please remember that historical prices do not indicate present or future prices.

2. Length of Agreement

Fixed Length (Duration) Agreement – You will buy your natural gas commodity service for the above address from PE beginning on the date set by your NGDC and continuing for the term set forth in your Contract Summary.

Month-to-Month Agreement – You will begin purchasing your natural gas commodity for the above address from PE beginning on the date set by your NGDC and continuing on a month to month basis until cancelled by you or PE. See Section 5 for information on how to cancel this agreement.

You must be at least 18 years old or an emancipated minor to establish an account with PE. After your successful enrollment with PE and confirmation by the NGDC, PE will supply your natural gas until either you or PE cancels your service. Your service with PE begins on the date provided to you by the NGDC. PE will submit your request to the NGDC. PE is not responsible for NGDC delays in processing your enrollment or cancellation request.

For new customers, your contract begins on your effective date as established by the NGDC and continues for the period specified in your contract. For existing PE customers choosing a new price plan, your contract is effective upon the date your price plan change request is processed by PE, and continues for the length of your contract, unless a later effective date is determined between you and PE (e.g., if you are on a current fixed price plan contract with PE and you request a new fixed price or variable price plan contract with PE, it will generally take effect the day following the expiration of your current fixed price plan contract).

3. Special Terms and Conditions/Promotions –

PE may from time to time offer promotional or discounted prices. Customers enrolling on a promotional offer may be subject to natural gas consumption limitations. If you exceed the consumption limitation at any time during your contract duration, PE reserves the right to terminate your plan upon written notice, as detailed in Section 6 below. In that event, PE will send you a letter notifying you of this fact and your available options. You will not be charged an early termination charge under these circumstances. If you take no action, you will be automatically placed on PE's Variable Price Plan at the standard rate in effect at that time. Please read the terms of the offer for more details.

For any applicable incentive sign-up bonus, add-ons, limited time offers, or any sales promotions and exclusions, please see the Contract Summary page.

4. **Penalties, Fees and Exceptions** – After the rescission period described above, if your PE fixed price plan is terminated during the initial term of your contract, you will be assessed an Early Termination Charge as set forth in your Contract Summary. Such charge is intended to compensate PE for losses and expenses it estimates it will incur as the result of the early termination of a customer's fixed price plan. In addition, NGDC fees and limitations may apply for switching service to another supplier or back to the NGDC. If you do not pay your NGDC bills on time, you may be subject to late fees and/or disconnection of service.
5. **Cancellation** –You may cancel a variable price plan at any time without an early termination charge. After the rescission period stated above, if you cancel a fixed price plan before the initial term of your contract expires, an early termination charge will apply, as described in "Penalties, Fee and Exceptions" above. This contract will terminate automatically if the NGDC does not serve the requested premises, if you move, or if PE returns you to the NGDC's service. You have the right to terminate this contract without penalty if you move to a new location outside of your NGDC service area. You must notify PE if you are moving to a new location outside of your NGDC service area in order to have your early termination charge credited back to you. Depending on the NGDC's cancellation procedures, it may take up to the next full NGDC billing cycle for your account to be returned to the NGDC or switched to another supplier. You are responsible for all fees and charges until your service with PE is terminated.
The Binding Arbitration provisions of this contract shall survive termination of this contract or of your gas service. PE reserves the right to restrict eligibility for its plans at its discretion for any reason not prohibited by applicable law, including a customer's action to terminate any prior agreement with PE before the end of its established term.
6. **Agreement Expiration/Renewal Provisions/Change in Terms** – If you have a fixed duration contract approaching the expiration date, or whenever we propose to change the terms of service, you will receive two separate written notifications, the first approximately 60 – 75 days in advance and the second 45 days in advance of either the expiration date or the effective date of the proposed changes, including any automatic renewal. These notifications will explain your options going forward.

Upon the expiration of fixed duration contracts, your contract will automatically renew on a month-to-month basis under PE's Variable Price Plan at the standard price in effect at that time, unless PE provides you with notice, as set forth above, that the contract will renew for a longer term at a new fixed price. This contract shall automatically renew in accordance with the terms and conditions indicated in the notices unless you notify PE between the time of receipt of notice and the expiration of your current contract. You may, however, terminate the new contract during any renewal period at any time without incurring an early termination charge.

You can also call PE during the time between receipt of your notification and the renewal of your contract to request a new fixed or variable price plan contract, to take effect the day following the expiration of your current fixed price plan contract. If you select a fixed price plan, you will receive the fixed price in effect when you contact PE and make your selection.

If you do not contact PE prior to the expiration of your current contract, and your contract renews on a month-to-month basis under PE's Variable Price Plan at the standard price in effect at that time, PE will provide you with notice of subsequent changes in your billed price at least 30 days prior to the new price being charged.

If you cancel your fixed duration contract after receiving such notice but prior to the effective date of automatic renewal, you will be obligated under this contract until the end of the then-current term; provided, however, that depending on the NGDC's cancellation procedures, it may take up to the next full NGDC billing cycle for your account to be returned to the NGDC or switched to another supplier, and during that time, the renewal pricing and terms shall apply to service provided by PE. If you do terminate this contract and do not initiate another contract with PE, you can choose another gas supplier or, if you do not choose another gas supplier, you will return to the NGDC for service. If you decide not to renew

your contract with PE, whether you select another plan with us, return your natural gas service to the NGDC or choose another natural gas supplier, in order to avoid an early termination charge on your current contract, please be sure any actions that you take become effective after your current contract term expires.

- 7. Dispute Procedures** – Contact us with any questions concerning our terms of service. PE is not responsible for resolving disputes with the NGDC. However, if you have questions concerning your PE service, you may call PE toll-free at 1-866-425-6220 Monday – Friday from 8 a.m. to 5 p.m. EST, excluding certain national holidays, You may also contact us by mail at P.O. Box 78760 Atlanta, Georgia 30357 or by e-mail at customerservice@pennsylvaniaenergy.com. If your concern is not resolved with a customer service representative, you may contact our Customer Care Center and ask for a PE supervisor. If your concern is not resolved after you have called PE, you may contact the PAPUC for assistance at 1-800-692-7380 or at www.puc.state.pa.us.

If you need to report a natural gas leak or emergency, call the NGDC at the number listed on your bill.

- 8. Contract Assignment** – PE reserves the right to assign this contract to another natural gas supplier approved by the PAPUC. Contract terms and conditions will remain unchanged under an assignment, and PE will provide written notice to you prior to any such assignment.
- 9. Contact Information** –
Pennsylvania Energy
P.O. Box 78760
Atlanta, Georgia 30357 1-866-425-6220
www.pennsylvaniaenergy.com

Efficiency information and historical billing data is available upon request.

- 10. Information about shopping for a Natural Gas Supplier is available from** –
Pennsylvania Public Utility Commission (PAPUC)
400 North Street
Harrisburg, PA 17120
1-800-692-7380
www.pagasswitch.com

Pennsylvania Office of Consumer Advocate
www.oca.state.pa.us

11. Billing/Collections –

Based on your price plan, your PE charges will be billed by the NGDC, along with the NGDC's charges for its services. By agreeing to these terms and conditions of service, you agree to pay PE charges in accordance with the NGDC's payment procedures. If you do not pay your bills in accordance with those payment procedures or if you fail to comply with any agreed-upon payment arrangement, then the NGDC's service may be terminated in accordance with the NGDC's tariffs, and this contract may be terminated. Upon termination for nonpayment, you are required to pay PE the balance owed, including any early termination charges.

PE reserves the right to bill you directly for our services, including any Early Termination Charges. PE and the NGDC are responsible for collecting amounts owed on their respective bills. Upon 14 days' written notice, PE may cancel this contract for nonpayment. In that event, you must pay the entire PE balance due, including any early termination charges.

12. Your Account/Contact Information/ Call Monitoring –

You have the right to request up to 24 months of average monthly billed prices for your rate class and NGDC service territory.

By providing your contact information to PE (i.e., name, address, telephone number, fax number, e-mail address, etc.), you acknowledge that you are consenting to be contacted by mail, telephone, fax, voicemail, or e-mail by PE,

a third party on behalf of PE, or an associated company. PE may monitor and record telephone calls to our Customer Care Center for quality assurance purposes. All calls for new service are recorded in compliance with Commission guidelines.

You agree to allow your NGDC to release certain information to PE that will be needed to provide natural gas supply to you. This may include, but is not limited to, your historical and future usage, payment history and credit information, service address, rate classification and credit information. You authorize PE to release such information to third parties, affiliates and subcontractors that need to know such information in connection with your natural gas supply service. These authorizations will remain in effect as long as this contract remains in effect. You may rescind these authorizations at any time by either calling or providing written notice to PE. PE reserves the right to reject your enrollment or terminate this contract in the event these authorizations are rescinded.

13. **Regulatory Changes** – This contract is subject to present and future legislation, orders, rules, regulations and decisions of any duly constituted governmental authority having jurisdiction over this contract or the services to be provided hereunder. If at some future date there is a change in any law, rule, regulation or pricing structure whereby PE is prevented, prohibited or frustrated from carrying out the terms of this contract, then at its sole discretion PE shall have the right to cancel this contract on 15 days' notice to you.
14. **Entire Agreement** – This contract, including the welcome letter, any and all enrollment correspondence and your Contract Summary, constitutes the entire contract between you and PE with respect to PE providing natural gas supply to you and supersedes all prior written and oral contracts and representations made with respect to such matters. If any provision of the contract shall be deemed unlawful, void, or for any reason unenforceable, then that provision shall be deemed severable from the remaining provisions, which shall remain in full force and effect.
15. **Limitation of Liability and Disclaimer of Warranty** – PE is not responsible for any losses or damages resulting from any actions or policies of, or associated with, the NGDC, including interruption of service, termination of service, defective service, or operation and maintenance of the NGDC's system, nor is PE responsible for damages sought because of in-home or building damage. The remedy in any claim by you against PE will be solely limited to direct actual damages except as otherwise specifically authorized by statute. All other remedies at law or in equity are hereby waived by you. In no event will either PE or you be liable for consequential, incidental, indirect, special, or punitive damages, except where specifically authorized by statute. These limitations apply without regard to the cause of any liability or damages. There are no third-party beneficiaries to this contract. PE MAKES NO REPRESENTATIONS OR WARRANTIES OTHER THAN THOSE EXPRESSLY SET FORTH HEREIN, AND PE EXPRESSLY DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, MERCHANTABILITY AND FITNESS FOR A PARTICULAR USE.
16. **Extraordinary Events** – If an event occurs that delays or makes it impossible for PE to perform, such as an act of God, extraordinary weather occurrence, a facility outage on the NGDC system or interstate pipeline systems, a failure to perform by the NGDC, war, civil disturbance, or national emergency, our performance under these terms and conditions shall be excused for the duration of the event. Under such conditions, PE may elect to discontinue service to you immediately, without notice.
17. **Binding Arbitration** –

You and PE agree that any and all disputes, controversies and claims (“Dispute(s)”) between you and PE that cannot be resolved through the Customer Service/Dispute Procedures described above will be resolved exclusively through binding arbitration by the American Arbitration Association (“AAA”) (“Binding Arbitration”) or small claims court. Individual claims filed in a small claims court are not subject to arbitration, as long as the matter stays in small claims court. If a small claims court matter is appealed to any other court, then the appeal will be resolved exclusively through Binding Arbitration. Binding Arbitration means that you and PE will have a fair hearing before a neutral arbitrator instead of in a court with a judge or jury. Binding Arbitration is more informal than a lawsuit in court. Binding Arbitration is subject to very limited review by courts. Arbitrators can award the same damages and relief that a court can award. The decision of the arbitrator will be final and binding, and the arbitrator's award may be confirmed and entered as a judgment by any court of competent jurisdiction. The Binding Arbitration for commercial customers will be governed by the Commercial Dispute Resolution Procedures and for residential customers by the Consumer Arbitration Rules of the AAA, as modified by this contract. **Nothing in this section limits your right to file a formal or informal complaint with the Pennsylvania Public Utility Commission.**

This agreement to arbitrate is intended to be broadly interpreted. It includes, but is not limited to:

- claims arising out of or relating to any aspect of the relationship between us, whether based in contract, tort, statute, fraud, misrepresentation or any other legal theory;
- claims that arose before this or any prior agreement (including, but not limited to, claims related to advertising);
- claims that are currently the subject of pending litigation, including claims that are currently the subject of purported class action litigation in which you are, or are not, a member of a certified class;
- claims that may arise after the termination of this contract.

The term "Dispute" also includes any dispute regarding whether a particular controversy is subject to arbitration, including any claims as to the enforceability of this Binding Arbitration provision. You can initiate Binding Arbitration by filing a Claim Form with the AAA and by sending a copy of the Claim Form to PE at P.O. Box 78760, Atlanta, Georgia 30357. The Claim Form is available on the AAA website, www.adr.org, on the PE website, www.pennsylvaniaenergy.com, or by calling PE at 1-866-425-6220. You can complete the Claim Form on the AAA website or you can mail the Claim Form to AAA Case Filing Services, 1101 Laurel Oak Road, Suite 100, Voorhees, New Jersey 08043, with a copy to PE. You do not need to send payment to the AAA, PE will pay the filing fee upon receipt of a copy of the Claim Form.

The Binding Arbitration will be conducted by a single arbitrator who shall be mutually agreed upon by you and PE; provided, however, that if we are unable to agree then the arbitrator shall be selected by the AAA in accordance with its rules. The Binding Arbitration will take place in the county where you are billed or in a mutually agreed location. If the amount of the claim is \$25,000 or less, you may choose whether the arbitration takes place in person, by telephone, or on written submissions. If the amount of the claim is more than \$25,000, the type of hearing shall be determined by the AAA rules. The arbitrator will make his/her decision in writing, but need not provide a statement of reasons unless requested by either you or PE, in which event the arbitrator will provide a concise statement of the essential findings and conclusions on which the award is based.

PE will pay all Binding Arbitration filing fees and arbitrator's costs. You are responsible for all additional costs that you incur in the Binding Arbitration, including, but not limited to, attorney's fees (if you choose to be represented by an attorney) and expert witness fees. You shall not be required to reimburse PE for the filing fees and Binding Arbitration costs paid by it unless the arbitrator determines that your claim was frivolous. Notwithstanding anything to the contrary in this Binding Arbitration provision, PE will pay all fees and costs that it is required by law to pay, including payment of your attorney's fees and litigation costs if required by applicable law. In addition, if the arbitration award is greater than PE's last settlement offer or if PE did not make a settlement offer, PE will pay twice the amount of your attorney's fees, reimburse the expenses reasonably incurred by your attorney in pursuing your claim and a \$7,500 minimum recovery; provided, however, that you may not recover duplicative awards of attorney's fees and expenses. Although under some laws PE may have the right to an award of attorney's fees and expenses if it prevails, PE agrees not to seek such an award.

Both you and PE expressly waive the right to bring or to participate in a class action. All parties to the Binding Arbitration must be individually named. There shall be no right or authority for any claims to be arbitrated or litigated on a class action or consolidated basis or on bases involving claims brought in a representative capacity on behalf of the general public (such as a private attorney general), other recipients of gas service from PE, or other persons similarly situated.

You and PE agree that where the amount at issue is a small claim within the jurisdiction of the Municipal or County Court and is an individual and not a class action claim, you or PE may elect to proceed in that court. This Binding Arbitration agreement does not preclude you from bringing issues to the attention of federal, state, or local agencies. Such agencies can, if the law allows, seek relief against PE on your behalf.

This contract evidences a transaction in interstate commerce, and thus the Federal Arbitration Act governs the interpretation and enforcement of this provision. This Binding Arbitration provision shall survive termination of this contract.

18. **Binding Arbitration – Choice of Law and Venue** – This contract shall be construed under and shall be governed by the laws of Pennsylvania without regard to the application of its conflicts of law principles, except that the Federal Arbitration Act shall govern the arbitrability and the arbitration of all Disputes.



Pennsylvania Energy[™]
Natural Gas Supplier Contract Summary

Pennsylvania Energy (PE)	License Number: Customer Service Phone Number: 1-866-425-6220 Customer Service Email: customerservice@pennsylvaniaenergy.com Hours of Operation: Monday – Friday 8 a.m. to 5 p.m. ET. Website: www.pennsylvaniaenergy.com Pennsylvania Energy is responsible for the supply of your natural gas commodity.
Natural Gas Price Structure	<u>Fixed Price Plan</u> : Fixed price plan prices remain the same for the term of the contract specified below.
Natural Gas Supply Price	This contract has a price per Mcf/Ccf of \$«price_per_Mcf/Ccf». Your price is exclusive of the Natural Gas Distribution Company's (NGDC) service and delivery charges.
Statement Regarding Savings	There are no guaranteed savings under this contract. The price on a PE plan may be higher than the NGDC price.
Contract Start Date	Your contract begins on your effective date as established by the NGDC, which is based on your meter reading date, and continues for the period specified below.
Contract Duration / Length	<<XX months>>
Cancellation / Early Termination Fees	Yes. \$«XXX.00» if your fixed plan contract is terminated more than six (6) months before your contract expires. \$«XX.00» if your fixed plan contract is terminated six (6) months or less before your contract expires.
Incentives	N/A
End of Contract/ Renewal Terms	PE may make changes to the terms of this contract, including price, term length, price plan and early termination charge, after expiration of your current term. You will receive two notifications prior to your contract expiration or renewal, the first notice approximately 60-75 days prior to expiration and the second notice approximately 45 days prior to expiration. The notifications will explain your options going forward. If you do not cancel the contract prior to the effective date of such changes, this contract will automatically renew at your new noticed price and terms thereafter. This contract will automatically renew on a month-to-month basis under PE's Variable Price Plan at the standard price in effect at that time, unless PE provides you with notice, as set forth above, that the contract will renew for a longer term at a fixed price. Please see your Disclosure Statement for more information.
Deposits	N/A
Binding Arbitration	Please carefully review the Terms and Conditions of Service, as they may affect your rights. In particular, they require you to resolve any disputes with PE through individual Binding Arbitration.

For additional information, please refer to your Disclosure Statement. Please retain this document for your records.



Pennsylvania Energy
Natural Gas Supplier Contract Summary

Pennsylvania Energy (PE)	License Number: Customer Service Phone Number: 1-866-425-6220 Customer Service Email: customerservice@pennsylvaniaenergy.com Hours of Operation: Monday – Friday 8 a.m. to 5 p.m. ET. Website: www.pennsylvaniaenergy.com Pennsylvania Energy is responsible for the supply of your natural gas commodity.
Natural Gas Price Structure	<u>Variable Price Plan:</u> Variable price plan prices may change or remain the same monthly, with no limit on the variability from month to month. Many factors influence retail natural gas pricing, including, without limitation, the cost to PE to obtain natural gas on your behalf, including, but not limited to, commodity, capacity, storage, balancing, transportation to the Delivery Point; operating expense; all applicable taxes, fees, charges or other assessments, and PE's costs, expenses and profit margins; and other factors. PE sets its prices each month based on the most current information available. You will receive no advance notification prior to a variable price change. You will see the current month's variable price on your bill.
Natural Gas Supply Price	This contract has a variable price that will appear on your first bill as \$<<price_per_Mcf/Ccf>>. Your price is exclusive of the Natural Gas Distribution Company's (NDGC) service and delivery charges.
Statement Regarding Savings	There are no guaranteed savings under this contract. The price on a PE plan may be higher than the NGDC price.
Contract Start Date	Your contract begins on your effective date as established by the NGDC, which is based on your meter reading date, and continues for the period specified below.
Contract Duration / Length	Month-to-Month
Cancellation / Early Termination Fees	This contract has no early termination charge.
Incentives	N/A
End of Contract/ Renewal Terms	This contract renews month-to-month until it is canceled by you, the NGDC or PE.
Deposits	N/A
Binding Arbitration	Please carefully review the Terms and Conditions of Service, as they may affect your rights. In particular, they require you to resolve any disputes with PE through individual Binding Arbitration.

For additional information, please refer to your Disclosure Statement. Please retain this document for your records.

Attachment 12. Newspaper Publications

Notarized Proofs of Publications from:

Erie Times-News

Harrisburg Patriot News

Pittsburgh Post-Gazette

Williamsport Sun-Gazette

Johnstown Tribune-Democrat

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

BUCHANAN INGERSOLL & ROONEY PC
409 N SECOND ST SUITE 500
HARRISBURG PA 17101-1357

REFERENCE: 102944 323345
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: 07/07/18

TOTAL COST: \$610.00 AD SPACE: 0 Lines

FILED ON: 07/07/18

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

Application of SouthStar Energy Services LLC (d/b/a "Pennsylvania Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier or Aggregator Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Pennsylvania Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a supplier or aggregator of natural gas engaged in the business of providing natural gas services. Pennsylvania Energy proposes to sell natural gas and related services in the service areas of Columbia Gas of Pennsylvania, Inc., Peoples Gas Company, The Peoples Natural Gas Company, and Peoples Gas - Equitable Division 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 Pennsylvania 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 Pennsylvania Energy's attorney at the address listed below.

SouthStar Energy Services LLC d/b/a Pennsylvania Energy
c/o Alan M. Seltzer, Esquire
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101
717 237 4862
717 233 0852 Fax

EP-323345

Sworn to and subscribed before me this 9th day of July 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



The Patriot News
LEGAL AFFIDAVIT

AD#: 0008698822

Commonwealth of Pennsylvania,) ss
County of Cumberland)

Donna Maldonado 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 07/10/2018

Signature of Donna Maldonado
Principal Clerk of the Publisher

Sworn to and subscribed before me this 11th day of July 2018

Signature of Notary Public
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Crystal B. Rosensteel, Notary Public
Susquehanna Twp., Dauphin County
My Commission Expires June 27, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

Application of SouthStar Energy Services LLC (d/b/a "Pennsylvania Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier or Aggregator Engaged in The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Pennsylvania Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a supplier or aggregator of natural gas engaged in the business of providing natural gas services.

Pennsylvania Energy proposes to sell natural gas and related services in the service areas of Columbia Gas of Pennsylvania, Inc., Peoples Gas Company, The Peoples Natural Gas Company, and Peoples Gas - Equitable Division 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 Pennsylvania 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 Pennsylvania Energy's attorney at the address listed below.

SouthStar Energy Services LLC
d/b/a Pennsylvania Energy
c/o Alan M. Seltzer, Esquire
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101
717 237 4862
717 233 0852 Fax

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

Commonwealth of Pennsylvania, County of Allegheny, ss D. Rullo, 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 Pittsburgh Post-Gazette edition and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

06 of July, 2018

Affidavit further deposes the 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 aforesaid notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

COPY OF NOTICE OR PUBLICATION

PENNSYLVANIA
PUBLIC UTILITY
COMMISSION

NOTICE

Application of SouthStar Energy Services LLC d/b/a "Pennsylvania Energy" For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier or Aggregator Engaged in the Business of Supplying Natural Gas Supply Services to the Public in the Commonwealth of Pennsylvania.

Pennsylvania Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a supplier or aggregator of natural gas engaged in the business of providing natural gas services. Pennsylvania Energy proposes to sell natural gas and related services in the service areas of Columbia Gas of Pennsylvania, Inc., Peoples Gas Company, The Peoples Natural Gas Company, and Peoples Gas. Equitable Division 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 Pennsylvania 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 Pennsylvania Energy's attorney at the address listed below.

SouthStar Energy Services LLC d/b/a Pennsylvania Energy Co
Adam W. Seitzer, Esquire, Buchanan Ingersoll & Rooney PC, 400 N. Second Street, Suite 500, Harrisburg, PA 17101, 717 337 4363, 717 333 0852 Fax

PG Publishing Company

Sworn to and subscribed before me this day of:
July 09, 2018

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

STATEMENT OF ADVERTISING COSTS

Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
ATTN: Gina Myers
HARRISBURG, PA 17101-1357

To PG Publishing Company

Total \$ 496.00

Client:

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 Dr.
Clinton, PA 15026
Phone 412-263-1338

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

By Samuel J. Arbutina

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.

Attorney For

PROOF OF PUBLICATION 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:

July 9, 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.

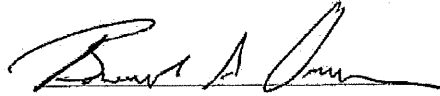
**PENNSYLVANIA
PUBLIC UTILITY
COMMISSION
NOTICE**

Application of SouthStar Energy Services LLC (d/b/a "Pennsylvania Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier or Aggregator Engaged in The Business Of Supplying Natural Gas Supply Services, To The Public in The Commonwealth Of Pennsylvania.

Pennsylvania Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a supplier or aggregator of natural gas engaged in the business of providing natural gas services. Pennsylvania Energy proposes to sell natural gas and related services in the service areas of Columbia Gas of Pennsylvania, Inc., Peoples Gas Company, The Peoples Natural Gas Company, and Peoples Gas - Equitable Division 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 Pennsylvania 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 Pennsylvania Energy's attorney at the address listed below.

SouthStar Energy Services LLC d/b/a Pennsylvania Energy
c/o Alan M. Seltzer, Esquire
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101
717 237 4862
717 233 0852 Fax



SUN-GAZETTE LLC

Sworn to and subscribed before me

The 9th day of July 20 18



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\$ 274.80

Probated same.....\$

Total.....\$ 274.80

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

COMMONWEALTH OF PENNSYLVANIA }
 County of Cambria } SS

PENNSYLVANIA
 PUBLIC UTILITY COMMISSION
 NOTICE

Application of SouthStar Energy Services LLC (d/b/a "Pennsylvania Energy") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier or Aggregator Engaged In The Business Of Supplying Natural Gas Supply Services To The Public In The Commonwealth Of Pennsylvania.

Pennsylvania Energy will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a supplier or aggregator of natural gas engaged in the business of providing natural gas services. Pennsylvania Energy proposes to sell natural gas and related services in the service areas of Columbia Gas of Pennsylvania, Inc., Peoples Gas Company, The Peoples Natural Gas Company, and Peoples Gas - Equitable Division 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 Pennsylvania 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 Pennsylvania Energy's attorney at the address listed below.

SouthStar Energy Services LLC d/b/a Pennsylvania Energy
 c/o Alan M. Sellzer, Esquire
 Buchanan Ingersoll & Rooney PC
 409 N. Second Street, Suite 500
 Harrisburg, PA 17101
 717 237 4862
 717 233 0852 Fax

Signed and sworn to before me on
 11th day of July, 2018,
 by Christine Marhefka making the statement.

[Handwritten Signature]

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

On this 11th day of July 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 July 6, 2018; and that the Affiant is not interested in all of the allegations as to time, place and character of

[Handwritten Signature: Christine Marhefka]

STATEMENT OF ADVERTISING COSTS

0.00 Lines @ \$2.50 per line	0.00
7 Inches @ \$25.00 per inch	175.00
Notary Fee	5.00
Clerical Fee	2.50
Total Cost	182.50

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 _____