



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

August 30, 2018

Docket No. A-2018-3004010
Utility Code: 1221290

CERTIFIED

ROBINE GUILLAUME ASST ACCT MNGR
LICENSELOGIX LLC
140 GRAND ST STE 300
WHITE PLAINS NY 10601

RE: Natural Gas Supplier License Application

Dear Ms. Guillaume:

On August 16, 2018, Palmer Energy Company Inc's application for a Natural Gas Supplier license was accepted for filing and docketed with the Public Utility Commission. The application was incomplete. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached question(s).

Please be advised that you are directed to forward the requested information to the Commission within **30** days of receipt of this letter. Failure to respond may result in the application being denied. As well, if Palmer Energy Company Inc has decided to withdraw its application, please reply notifying the Commission of such a decision.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

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

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, _____, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the

Docket No. A-2018-3004010
Palmer Energy Company Inc
Data Requests

1. Reference Application, Section 1.b, Registered Agent – Applicant is required to provide a registered agent located within the Commonwealth of Pennsylvania, with an address listed on the Commercial Registered Office Providers website. Please provide an updated application page with the appropriate corrections.

<http://www.dos.pa.gov/BusinessCharities/Business/Resources/Pages/Commercial-Registered-Office-Providers.aspx#.Vp-Q4GQo6zV>

2. Reference Application, Section 2.b, Chief Officers – Applicant failed to provide its chief officers' names and addresses. Please provide an updated application page with the requested information.
3. Reference Application, Section 3.a, Affiliates – Applicant failed to provide its affiliates' addresses and state whether any of the affiliates are jurisdictional public utilities. Please file an updated application page with the information requested.
4. Reference Application, Section 7.a, Financial Fitness – Applicant failed to provide natural gas distribution company (NGDC) bonding letters for each NGDC in whose service territory applicant intends to operate. Please provide the missing documentation.
5. Reference Application, Section 7.b, Financial Fitness – Applicant failed to provide documentation to demonstrate financial fitness. Please provide financial fitness documentation that may include two consecutive years of income tax filings, three consecutive months of bank statements, etc.
6. Reference Application, Section 7.f, Taxation – Applicant must submit an updated Tax Certification Statement to correct the below deficiencies:
 - a. Applicant provided an incorrect Corporate Box Number instead of a Revenue ID Number on its Tax Certification Statement. Any company registered in the Commonwealth of Pennsylvania after March 2013 must contact the Pennsylvania Department of Revenue for its 10-digit Revenue ID Number. Please submit a corrected Tax Certification Statement; and
 - b. Applicant should remove the Social Security Numbers from its Tax Certification Statement. Social Security Numbers should only be included for Sole Proprietors operating without a Federal Employer Identification Number.
7. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide licenses for each state or commonwealth in which it currently operates within the electric or natural gas industries. Please provide the missing documentation.

8. Reference Application, Section 11.a, Application Affidavit – The Application Affidavit submitted lists the applicant’s name as “Palmer Energy Company” rather than “Palmer Energy Company Inc”, per the Pennsylvania Department of State website. Please resubmit the Application Affidavit.
9. Reference Application, Section 11.b, Operations Affidavit – Applicant must submit an updated Operations Affidavit to correct the below deficiencies:
 - a. Applicant listed its name as “Palmer Energy Company” rather than “Palmer Energy Company Inc”, per the Pennsylvania Department of State website;
 - b. Applicant listed the Office of Affiant as “Elaine Canning” rather than “Vice President”; and
 - c. Applicant listed the Name of Applicant as “Vice President” rather than “Palmer Energy Company Inc”.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Palmer Energy Company Inc, d/b/a _____, 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:

Palmer Energy Company Inc
5577 Airport Highway, Suite 101
Toledo, OH 43615
www.palmerenergy.com
419-539-9180

- b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

Registered Agent Solutions, Inc.
125 Locust Street
Harrisburg, PA 17101
P: 888-705-7274 F: 888-706-7274

- 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.

Robine Guillaume
Assistant Account Manager
140 Grand Street, Ste 300, White Plains, NY 10601
P: 800-292-0909 F: 212-672-1105
RGuillaume@licenselogix.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.

Not using an attorney

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** Provide the name, title, address, telephone number, fax number, and e-mail **OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED)** responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Natural Gas Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed NGSS.

Andrea Flowers, Program Manager
5577 Airport Highway, Suite 101
Toledo, OH 43615
T: 419 539 9180 / F: 419 539 9185
aflowers@palmerenergy.com

Elaine Canning, Vice President
5577 Airport Highway, Suite 101
Toledo, OH 43615
ecanning@palmerenergy.com
419-491-1001

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

Mark Frye (President) - 5577 Airport Highway, Suite 101, Toledo, OH 43615

Kirkland Mizerek (Executive Vice President) - 5577 Airport Highway, Suite 101, Toledo, OH 43615

Elaine Canning (Vice President) - 5577 Airport Highway, Suite 101, Toledo, OH 43615

Anne Schenk (Vice President, Consulting) - 5577 Airport Highway, Suite 101, Toledo, OH 43615

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.

Chamber Energy Solutions - 5577 Airport Highway, Suite 101, Toledo, OH 43615

Growers Energy Solutions - 5577 Airport Highway, Suite 101, Toledo, OH 43615

CCAO Energy Solutions - 5577 Airport Highway, Suite 101, Toledo, OH 43615

OML Energy Solutions - 5577 Airport Highway, Suite 101, Toledo, OH 43615

Alternative Gas & Electric Energy Solutions - 5577 Airport Highway, Suite 101, Toledo, OH 43615

None of the Affiliates listed above are jurisdictional public utilities.

- 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.

N/a.



Exhibit 8.a. Current Licenses

Palmer Energy Company, Inc. currently holds the licenses listed below:

1. Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate
Certificate Number: 10-194G(4)
2. Ohio Competitive Retail Electric Service Provider
Certificate Number: 10-265E(4)

Copies of the certificates are attached herewith.

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

Issued pursuant to Case Number(s):
10-1082-GA-AGG

is
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:
10-194G(4)

Granted to:
Palmer Energy Company, Inc.

Whose office or principal place of business is located at:
5577 Airport Hwy., Ste 101, Toledo, OH 43615

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

Certification Effective:
September 6, 2016 through September 6, 2018

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

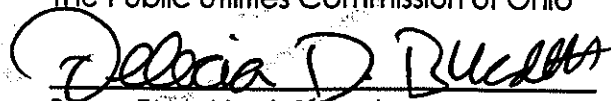
This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

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

Witness the seal of the Commission affixed at Columbus, Ohio

Dated: **September 9, 2016**

By Order of
The Public Utilities Commission of Ohio



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



**Public Utilities
Commission**

John Kasich, Governor
Asim Z. Haque, Chairman

Commissioners
Lynn Staby
M. Beth Trombold
Thomas W. Johnson
M. Howard Petricoff

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

RENEWAL

Certificate Number:

10-265E (4)

Issued Pursuant to Case Number(s):

10-1081-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to **Palmer Energy Company, Inc.** whose office or principal place of business is located at **5577 Airport Highway, Suite 101, Toledo, Ohio 43615** to provide **aggregation and power broker** services within the State of Ohio effective **September 5, 2016**

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

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: **September 7, 2016**

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO

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

Certificate Expires: September 5, 2018