

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

November 29, 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-2018-3005507 – **RESPONSES TO DATA REQUESTS**

Dear Secretary Chiavetta:

Attached for e-filing with the Pennsylvania Public Utility Commission (“Commission”) are the Responses of SouthStar Energy Services LLC D/B/A Pennsylvania Energy (“SouthStar”) to Commission Staff’s Data Requests dated October 30, 2018 regarding the above-referenced Application. Included with the Responses are the **non-confidential** attachments and information requested by Staff for the Data Requests, along with a signed Verification.

Responses to Data Requests 1, 2, 3, and 5 contain confidential and proprietary information and a hardcopy of the confidential attachments are being filed separately with the Commission via hand delivery under seal of confidentiality.

Please advise if you have any questions in connection with this matter. Thank you.

Very truly yours,



Alan M. Seltzer

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

AMS/gm
Attachments

cc: Jordan Van Order (via e-mail)
Certificate of Service (via first class mail)

Docket No. A-2018-3005507
SouthStar Energy Services LLC D/B/A Pennsylvania Energy
Response to Data Requests

1. Reference Application, Section 3.a and 3.b, Affiliates and Predecessors – Applicant failed to state whether any of its affiliates currently do business in the state of Pennsylvania. Please file an updated Application page with the information requested.

RESPONSE:

Attached are an updated Application page 6 and Confidential Attachment DR 1, which provides the names and addresses of Applicant's affiliates that currently do business in Pennsylvania.

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.

The names and addresses of Applicant's affiliates that are currently doing business in Pennsylvania are set forth in Confidential Attachment DR 1.

- 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.

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2. Reference Application, Confidential Attachment 5, Section a, Second Page. Please provide a copy of the settlement agreement for item 5.

RESPONSE:

See Confidential Attachment DR 2, a copy of the executed Release of Claims dated June 21, 2016, which represents the settlement agreement resolving the case at item 5.

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Response to Data Requests

3. Reference Application, Confidential Attachment 5, Section a, Third Page. Please provide a copy of the settlement agreement for item 2.

RESPONSE:

The referenced settlement agreement is not readily available and is not likely to be available under any circumstances, as noted further in Confidential Attachment DR 3.

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4. Reference the Application, Section 5.c, Customer/Regulatory/Prosecutory Actions – Please provide a list and summary of any competition related violations against SouthStar Energy LLC or its affiliates.

RESPONSE:

The response in the Application to this question already covers any competition related violations. SouthStar considers “Regulatory Actions” to be no different from “competition related violations” and does not have additional information beyond the original response provided in the Application. Please see also Applicant’s clarifying paragraph in Application, Section 5.c.

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Response to Data Requests

5. Reference Application, Section 7.b, Financial Fitness. Please provide a copy of the fully executed Guaranty Agreement.

RESPONSE:

See Confidential Attachment DR 5.

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SouthStar Energy Services LLC D/B/A Pennsylvania Energy
Response to Data Requests

6. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide a license to operate as a natural gas supplier or public utility for Georgia, Florida, New York, Maryland, Michigan, Tennessee, North Carolina, South Carolina, Alabama, and Illinois. Please provide the missing documentation.

RESPONSE:

Please see the matrix at Attachment DR 6 which addresses the basis of Applicant's authority to provide retail natural gas service in Georgia, Florida, New York, Maryland, Michigan, Tennessee, North Carolina, South Carolina, Alabama, and Illinois.

Attachment DR 6

STATE	COMPANY NAME	DOCKET NUMBER	AUTHORITY TO PROVIDE RETAIL NATURAL GAS SUPPLY SERVICES	COMMENT
Georgia	SouthStar Energy Services LLC d/b/a Georgia Natural Gas Services	Docket No. 9574-U	Interim Certificate Order GM-0017 issued October 6, 1998 granted Certificate of Authority to operate as a Marketer of Firm Gas Supply.	No separate license or certificate issued.
Florida	SouthStar Energy Services LLC d/b/a Florida Natural Gas		SouthStar provides natural gas service to consumers through a utility-tariffed program of Central Florida Gas, which does not require a Commission license. SouthStar is one of two suppliers that has been chosen by Central Florida Gas to operate in its territory.	No license or certificate issued or required.
New York	SouthStar Energy Services LLC d/b/a New York Natural Gas	ESCO Code SSNY	Letter dated October 13, 2010 notification that Retail Access Application Package to become Energy Services Company (ESCO) is in compliance with ESCO eligibility requirements.	No separate license or certificate issued.
Maryland	SouthStar Energy Services LLC d/b/a Maryland Energy	IR-2106	Letter Order dated December 22, 2010 granted authority to supply natural gas or natural gas supply services.	No separate license or certificate issued.
Michigan	SouthStar Energy Services LLC d/b/a Grand Rapids Energy	Case No. U-17228	Order issued on July 11, 2013 granted authority to operate as an Alternative Gas Supplier.	No separate license or certificate issued.
Tennessee	SouthStar Energy Services LLC		SouthStar offers contracted supply service to large commercial and industrial customers to provide natural gas supply to the city gate. This type of retail activity does not require a Commission license.	No license or certificate issued or required.
North Carolina	SouthStar Energy Services LLC		SouthStar offers contracted supply service to large commercial and industrial customers to provide natural gas supply to the city gate. This type of retail activity does not require a Commission license.	No license or certificate issued or required.

STATE	COMPANY NAME	DOCKET NUMBER	AUTHORITY TO PROVIDE RETAIL NATURAL GAS SUPPLY SERVICES	COMMENT
South Carolina	SouthStar Energy Services LLC		SouthStar offers contracted supply service to large commercial and industrial customers to provide natural gas supply to the city gate. This type of retail activity does not require a Commission license.	No license or certificate issued or required.
Alabama	SouthStar Energy Services LLC		SouthStar offers contracted supply service to large commercial and industrial customers to provide natural gas supply to the city gate. This type of retail activity does not require a Commission license.	No license or certificate issued or required.
Illinois	Illinois Energy, USA, LLC fka Prairie Point Energy, L.L.C.	05-0814	Order issued February 8, 2006 granted authority to operate as an Alternative Gas Supplier.	No separate license or certificate issued. The name of the company was changed on November 1, 2017 from Prairie Point Energy, L.L.C. to Illinois Energy, USA, LLC. A copy of the proof of name change is attached.

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "PRAIRIE POINT ENERGY, L.L.C.", CHANGING ITS NAME FROM "PRAIRIE POINT ENERGY, L.L.C." TO "ILLINOIS ENERGY, USA, LLC", FILED IN THIS OFFICE ON THE FIRST DAY OF NOVEMBER, A.D. 2017, AT 8:02 O`CLOCK A.M.




Jeffrey W. Bullock, Secretary of State

3901473 8100
SR# 20176875968

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 203494196
Date: 11-01-17

**STATE OF DELAWARE
CERTIFICATE OF AMENDMENT**

1. Name of Limited Liability Company: Prairie Point Energy, L.L.C.

2. The Certificate of Formation of the limited liability company is hereby amended as follows:

Section 1 shall read as follows:

1. The name of the limited liability company is Illinois Energy, USA, LLC.

IN WITNESS WHEREOF, the undersigned have executed this Certificate on the 1st day of November, A.D. 2017.

By: Joanne A. Mello
Authorized Person(s)

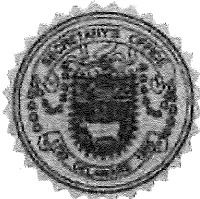
Name: Joanne A. Mello, Secretary
Print or Type

Delaware

PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "PRAIRIE POINT ENERGY, L.L.C.", FILED IN THIS OFFICE ON THE TWENTY-SECOND DAY OF DECEMBER, A.D. 2004, AT 3:28 O'CLOCK P.M.



3901473 8100

040932959

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 3572450

DATE: 12-22-04

CERTIFICATE OF FORMATION

OF

Prairie Point Energy, L.L.C.

1. The name of the limited liability company is Prairie Point Energy, L.L.C.
2. The address of its registered office in the State of Delaware is Corporation Trust Center, 1209 Orange Street, in the City of Wilmington, County of New Castle. The name of its registered agent at such address is The Corporation Trust Company.

IN WITNESS WHEREOF, the undersigned have executed this Certificate of Formation of Prairie Point Energy, L.L.C. this 22nd day of December, 2004



Nicor Inc. - Member
Daniel R. Dodge - Senior Vice President

DE403 - 6/5/03 C T System Online

State of Delaware
Secretary of State
Division of Corporations
Delivered 04:17 PM 12/22/2004
FILED 03:28 PM 12/22/2004
SRV 040932959 - 3901473 FILE

Docket No. A-2018-3005507
SouthStar Energy Services LLC D/B/A Pennsylvania Energy
Response to Data Requests

7. Reference Application, Section 12, Notarized Proofs – Applicant failed to provide a legible copy of the notarized proof of publication for the Pittsburgh Post-Gazette. Please provide a legible copy of the notarized proof of publication for the above newspaper.

RESPONSE:

Please see Attachment DR 7 for a legible copy of the notarized proof of publication for the Pittsburgh Post-Gazette.

Attachment DR 7

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 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

PG Publishing Company

Sworn to and subscribed before me this day of:
November 08, 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 Drive
Clinton, PA 15026
Phone 412-263-1338

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

By _____

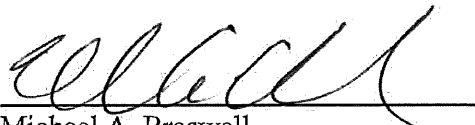
I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

Attorney For

VERIFICATION

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

Dated: 11/29/18



Michael A. Braswell
President and CEO
SouthStar Energy Services LLC

**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-2018-3005507
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 **Responses to Data Requests** 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

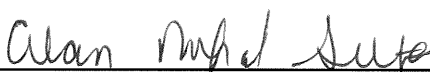
Peoples Natural Gas – Equitable Division
Lynda W. Petrichevich
375 North Shore Drive
Pittsburgh, PA 15212

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: November 29, 2018


Alan M. Seltzer, Esquire