



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”.



VALLEY ENERGY

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

July 17, 2018

Ms. Elaine Canning, Vice President
Palmer Energy Company, Inc.
5577 Airport Highway, Suite 101
Toledo, OH 43615

Dear Ms. Canning:

We understand that Palmer Energy Company, Inc. has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania including our company's service area.

Because Palmer Energy Company, Inc. intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Palmer Energy Company, Inc. will not be required to post a bond or other form of financial security instrument to provide these services in our service area. However, if the services provided change in the future, we reserve the right to require security from Palmer Energy Company, Inc. as deemed appropriate.

If you have any questions, please contact Jamie Levering at 570-888-9664.

Sincerely,

Edward E. Rogers
President & CEO

EER/ss

cc: J. Levering, Valley Energy
kkurlansky@licenselogix.com



July 12, 2018

Elaine Canning
Palmer Energy Company, Inc.
5577 Airport Highway, Suite 101
Toledo, OH 43615

Dear Elaine Canning:

We are pleased that Palmer Energy Company, Inc. has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Palmer Energy Company, Inc. 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. Palmer Energy Company, Inc. has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Palmer Energy Company, Inc. does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to Palmer Energy Company, Inc. changes in the future, Columbia Gas might deem it appropriate to require Palmer Energy Company, Inc. 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 Transportation Support Services



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 12, 2018

Elaine Canning
Vice President
Palmer Energy Company, Inc.
5577 Airport Highway, Suite 101
Toledo, OH 43615

Dear Ms. Canning:

We are pleased that Palmer Energy Company, Inc. 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 Palmer Energy Company, Inc. is not currently serving customers on the Peoples systems, we have determined at this time that Palmer Energy Company, Inc. 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 Palmer Energy Company, Inc. 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



National Fuel

July 12, 2018

Elaine Canning, Vice President
Palmer Energy Company
5577 Airport Highway, Suite 101
Toledo, OH 43615

Re: Palmer Energy Company

Dear Elaine,

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

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

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

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

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

Yours truly,

Nicole Barker
Transportation Services Department

July 13, 2018

Elaine Canning, Vice President
Palmer Energy Company, Inc.
5577 Airport Highway, Suite 101
Toledo, OH 43615

Re: Broker Requirements

Dear Palmer Energy Company, Inc.

PECO is aware that Palmer Energy Company, Inc. has applied for a license to provide brokering and consulting services to commercial and industrial customers on the distribution system of PECO.

In making such an application, Palmer Energy Company, Inc. could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Palmer Energy Company, Inc. has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers, and will not take title to any delivered natural gas; nor will accept any customer payments or deposits. Therefore, PECO has determined at this time that Palmer Energy Company, Inc. does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by Palmer Energy Company, Inc. or the creditworthiness requirement for PECO's exposure to Palmer Energy Company, Inc. changes in the future, PECO reserves the right to require Palmer Energy Company, Inc. to provide a bond or other financial security instrument.

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

Respectfully submitted,



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



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

July 12, 2018

Ms. Elaine Canning, Vice President
Palmer Energy Company, Inc.
5577 Airport Highway, Suite 101
Toledo, OH 43615

Mailing Address:
LicenseLogix
140 Grand Street, Suite 300
White Plains, NY 10601

Email: kkurlansky@licenselogix.com

RE: Security Requirement Bond for Palmer Energy Company, Inc.

Dear Ms. Canning:

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

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicholas LaPergola', is written over a light blue circular watermark that contains a stylized flame or gas burner.

Nicholas LaPergola
Director, Supply, Transportation & Control

NL/dls



UGI Utilities, Inc.
2525 N. 12th Street
Suite 360
PO Box 12677
Reading, PA 19612-2677

610-796-3400

VIA E-MAIL

Palmer Energy Company, Inc.
5577 Airport Highway
Suite 101
Toledo, OH 43615

ATTENTION: Elaine Canning, Vice President

**RE: Palmer Energy Company, Inc.
Application to Serve as a Natural Gas Broker**

Dear Mr. Canning,

Based on your assertion that Palmer Energy Company, Inc. ("PALMER ENERGY") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc. ("UGIU") has concluded that PALMER ENERGY will not need to post security with UGI Utilities, Inc. – Gas Division ("UGI"), UGI Penn Natural Gas, Inc. ("PNG") or UGI Central Penn Gas, Inc. ("CPG"). This is based on the declaration that PALMER ENERGY will be acting in conjunction with a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the respective UGIU Tariffs. If PALMER ENERGY wishes to directly serve Choice customers in the serve territories of UGI, PNG and/or CPG in the future as a natural gas supplier, it will have to post security as specified in the respective UGI Tariffs prior to the commencement of the service.

Please feel free to contact me with any additional questions you may have.

Sincerely,

David E. Lahoff
Senior Manager
Tariff & Supplier Administration