

Energy Managed.

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RECEIVED

FEB 07 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

A-2019-3007815

Dear Pennsylvania Public Utility Commission,

Upon receiving your letter dated February 4, 2019, We, National Utility Service, Inc. immediately contacted all NGDCs and requested bonding letters pursuant to Section 1.57 and 1.58 of the Commission's Regulation, 52 Pa. Code §§ 1.57 and 1.58.

Because National Utility Service, Inc. applies to become a broker and will not take entitle to the natural gas, all of NGDCs response that National Utility Service, Inc. does not need to post a bond. Please refer to letters attached for detail. For clarification, Responses of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC- Equitable Division, and Peoples Gas Company LLC (formerly Peoples TWP) are included in the same letter.

If you have any question or concern, please feel free to contact us

Contact Name: Nan Hu
Position: International Projects and Legal Associate
Email: nhu@nusconsulting.com
Phone: (201) 391-4300

Sincerely,
National Utility Service, Inc.

January 25, 2019

Richard Soultanian
National Utility Service, Inc
One Maynard Drive
Park Ridge, New Jersey 07656-0712

Dear Richard Soultanian:

We are pleased that National Utility Service, 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, National Utility Service, 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. National Utility Service, Inc has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that National Utility Service, 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 National Utility Service, Inc changes in the future, Columbia Gas might deem it appropriate to require National Utility Service, 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
January 30, 2019

Richard Soultanian
Co-President
National Utility Service, Inc.
One Maynard Drive
Park Ridge, New Jersey 07656-0712

Dear Mr. Soultanian:

We are pleased that National Utility Service, 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 National Utility Service, Inc. is not currently serving customers on the Peoples systems, we have determined at this time that National Utility Service, 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 National Utility Service, 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



VALLEY ENERGY

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

February 7, 2019

VIA EMAIL

Richard Soultanian
National Utility Service, Inc.
One Maynard Drive
Park Ridge, NJ 07656-0712
Nhu@nusconsulting.com

Dear Nan:

We understand that National Utility Service, 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 National Utility Service, Inc. intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that National Utility Service, 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 National Utility Service, Inc. as deemed appropriate.

If you have any questions, please contact Jamie Levering at 570-888-9664 (Ext. 5232).

Sincerely,

Edward E. Rogers
President & CEO

EER/ss

cc: J. Levering, Valley Energy



National Fuel

January 30, 2019

Richard Soultanian
National Utility Service, Inc.
One Maynard Drive
Park Ridge, NJ 07656-0712

Re: National Utility Service, Inc.

Dear Richard,

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

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

February 6, 2019

Richard Soultanian
National Utility Service, Inc.
One Maynard Drive
Park Ridge, NJ 07656-0712

Re: Broker Requirements

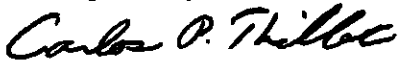
Dear National Utility Service, Inc.:

PECO is aware that National Utility Service, 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, National Utility Service, Inc. could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. National Utility Service, 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 National Utility Service, 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 National Utility Service, Inc. the creditworthiness requirement for PECO's exposure to National Utility Service, Inc. changes in the future, PECO reserves the right to require National Utility Service, 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

January 30, 2019

Mr. Richard Soultanian
National Utility Service, Inc.
One Maynard Drive
Park Ridge, NJ 07656-0712
Email: NHu@nusconsulting.com

RE: Security Requirement Bond for National Utility Service, Inc.

Dear Mr. Soultanian:

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

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

If you have any questions concerning the foregoing, please contact me at 215-684-6725.

Sincerely,



JOHN ZUK
Vice President, Gas Supply

NL/dls



UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517
610-796-3400

VIA E-MAIL

February 6, 2019

National Utility Service, Inc.
One Maynard Drive
Park Ridge, NJ 07656-0712

ATTENTION: Richard Soultanian, Co-President

**RE: National Utility Service, Inc.
Application to Serve as a Natural Gas Broker**

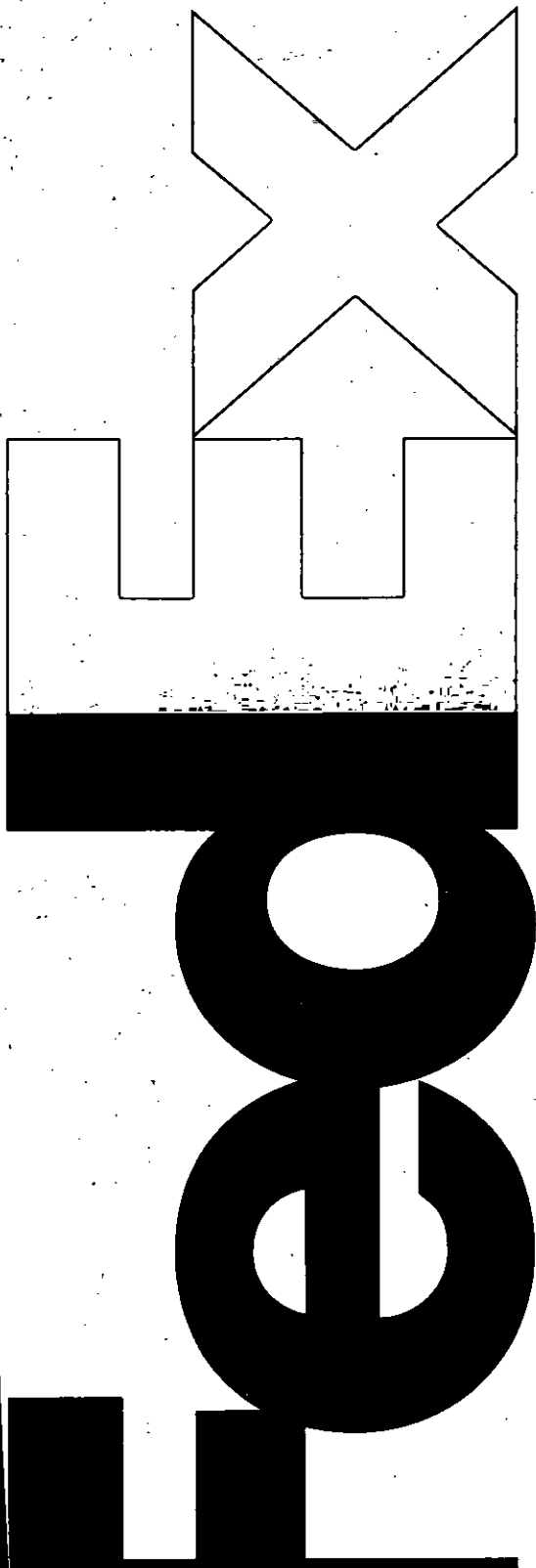
Dear Mr. Soultanian,

Based on your assertion that National Utility Service, Inc. ("NATIONAL UTILITY") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc. ("UGIU") has concluded that NATIONAL UTILITY will not need to post security with UGI Utilities, Inc. - South Rate District ("UGI South"), UGI Utilities, Inc. - North Rate District ("UGI North") or UGI Utilities, Inc. - Central Rate District ("UGI Central"). This is based on the declaration that NATIONAL UTILITY 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 NATIONAL UTILITY wishes to directly serve Choice customers in the service territories of UGI South, UGI North and/or UGI Central 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



Express



CMPC

To: CHIAVETA, R. PUC

Agency: PUC

Floor:

External Carrier: FEDEX

2/8/2019 9:55:28 AM



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ORIGIN ID: UMMA (201) 391-4300
INVENTORY
NATIONAL UTILITY SERVICE, INC.
1 MAYNARD DRIVE

PARK RIDGE, NJ 076560712
UNITED STATES US

SHIP DATE: 07FEB19
ACTWGT: 0.50 LB MAN
CAD: 0383017/CAFE3211

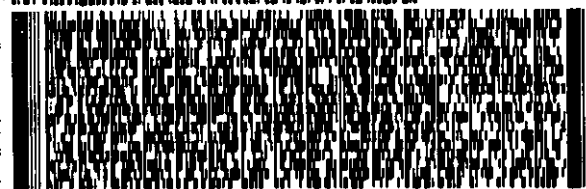
BILL SENDER

TO ROSEMARY CHIAVETTA
PA PUBLIC UTILITY COMMISSION
400 NORTH STREET

HARRISBURG PA 17120

(717) 772-7777
DEPT: LEGAL ASSOCIATE

REF: PA PUBLIC UTILITY COMMISSION



FedEx
Express



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FRI - 08 FEB 10:30A
PRIORITY OVERNIGHT

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