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REC'D
SEC. OF ENVIRONMENT & DAU
HARRISBURG, PA

Vasiliki Karandrikas
Direct Dial: 717.237.5274
Direct Fax: 717.260.1707
vkarandrikas@mcneeslaw.com

February 22, 2019

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

VIA HAND DELIVERY

**RE: Application of Employers' Energy Alliance of Pennsylvania, Inc., for Approval to Offer, Render, Furnish, or Supply Electricity or Electric Generation Services as a Broker to the Public in the Commonwealth of Pennsylvania – Responses to Data Requests
Docket No. A-2019-3007149**

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("PUC" or "Commission") letter issued on January 23, 2019, in Docket No. A-2019-3007149, please find attached for filing with the Commission the EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.'S ("EEA-PA") responses to the Commission's data requests.

EEA-PA respectfully requests that the Commission grant CONFIDENTIAL treatment of the documents found at Attachments 2-a, 2-b, 2-c, 3, and 4. EEA-PA believes this information is of a proprietary or confidential nature because it may reveal non-public financial information, sensitive information about EEA-PA's current and future business plans, and other information that is commercially sensitive and whose release may be injurious to EEA-PA's competitive position. To this end, the propriety and confidential information set forth in Attachments 2-a, 2-b, 2-c, 3, and 4 is so designated by being labeled "CONFIDENTIAL" and is being provided under protective seal to the Commission only. For these reasons, EEA-PA requests that the Commission treat these documents as confidential and prevent public disclosure in accordance with the Commission's procedures. Any party desiring access to the foregoing responses can contact the undersigned counsel with such a request.

If you have any questions regarding the enclosed documents, please contact the undersigned.

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Harrisburg, PA • Lancaster, PA • Scranton, PA • State College, PA • Columbus, OH • Frederick, MD • Washington, DC

Rosemary Chiavetta, Secretary
February 22, 2019
Page 2

In addition, please date stamp the enclosed extra copy of this filing, and kindly return it to our messenger for our filing purposes. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek (PA I.D. No. 78276)
Vasiliki Karandrikas (PA I.D. No. 89711)

Counsel to EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.

VK/leh
Enclosures

- c: Certificate of Service (without confidential attachments)
- Stephen Jakab, Bureau of Technical Utility Services (via Hand Delivery with confidential attachments)

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**EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.'S
RESPONSES TO
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION'S DATA REQUESTS
DOCKET NO. A-2019-3007149**

1. Reference Application, Section 1.a, Identify of Applicant – The Applicant stated throughout its EGS Application Package that the name of the Applicant is Employers' Energy Alliance of Pennsylvania, Inc. The PA Department of State states that the Applicant's registered name is EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC. Due to this inaccuracy, please provide a letter that states that the Applicant's name in the EGS Application Package contains numerous typographical errors and the correct name of the Applicant is EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.

Response: See Attachment 1 (Applicant Letter).

Response Provided by: Brad Phillips

Date: February 22, 2019

February 22, 2019

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

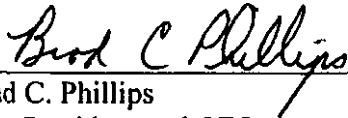
VIA HAND DELIVERY

RE: Application of Employers' Energy Alliance of Pennsylvania, Inc., for Approval to Offer, Render, Furnish, or Supply Electricity or Electric Generation Services as a Broker to the Public in the Commonwealth of Pennsylvania – Docket No. A-2019-3007149; Response to Data Request No. 1

Dear Secretary Chiavetta:

On December 26, 2018, Employers' Energy Alliance of Pennsylvania, Inc. ("EEA-PA" or "Applicant") filed with the Pennsylvania Public Utility Commission ("Commission" or "PA PUC") an Application for approval to offer, render, furnish, or supply electricity or electric generation services as a broker to the public in the Commonwealth of Pennsylvania ("EGS Application"). Please replace "Employers' Energy Alliance of Pennsylvania, Inc." with "EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC." throughout the EGS Application in order to strictly conform to the registered name on file with the Pennsylvania Department of State.

Sincerely,



Brad C. Phillips
Vice President and CFO
Manufacturer & Business Association

c: Stephen Jakab, Bureau of Technical Utility Services (via email)

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**EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.'S
RESPONSES TO
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION'S DATA REQUESTS**

DOCKET NO. A-2019-3007149

2. Reference Application, Section 7.b, Financial Fitness – Applicant failed to provide sufficient documentation to demonstrate financial fitness. Please provide financial fitness documentation that may include two recent consecutive years of financial statements separate from its parent company, three recent consecutive months of bank statements, and/or a Parental Agreement showing that the Applicant's Parent will provide adequate funding for the Applicant's daily operations.

Response: Applicant is providing unaudited financial statements from its internal records for the fiscal years ending March 31, 2017 and March 31, 2018 (see **CONFIDENTIAL** Attachment 2-a (Financial Statements)); bank statements for the three-month period between November 2018 and January 2019 (see **CONFIDENTIAL** Attachment 2-b (Bank Statements)); and a Parental Agreement regarding provision of operating funds to Applicant (see **CONFIDENTIAL** Attachment 2-c (Parental Agreement)).

Response Provided by: Brad Phillips

Date: February 22, 2019

**EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.'S
RESPONSES TO
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION'S DATA REQUESTS**

DOCKET NO. A-2019-3007149

3. Reference Application, Section 8.b, c, d, Technical Fitness – Applicant failed to provide an Explanation of Ethical Procedures. Please provide an updated application page with the appropriate corrections.

Response: Applicant has included excerpts from MBA's Employee Handbook. See **CONFIDENTIAL** Attachment 3 (MBA Handbook Excerpts)

In addition, as stated in the EGS Application, the EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.'S broker services are limited to facilitating communications between members and a third-party EGS with the technical experience and training necessary to comport with applicable customer safeguards, furnish electricity supply, and perform the related contracting, billing and payment activities.

Response Provided by: Brad Phillips

Date: February 22, 2019

**EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.'S
RESPONSES TO
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION'S DATA REQUESTS**

DOCKET NO. A-2019-3007149

4. Reference Application, Section 8.e, Technical Fitness – Applicant failed to provide detailed professional resumes of its chief officers, to include detailed descriptions on all experience and activities. Please provide the missing documentation.

Response: As stated in the EGS Application, the EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC.'S broker services are limited to facilitating communications between members and a third-party EGS with the technical experience and training necessary to comport with applicable customer safeguards, furnish electricity supply, and perform the related contracting, billing and payment activities.

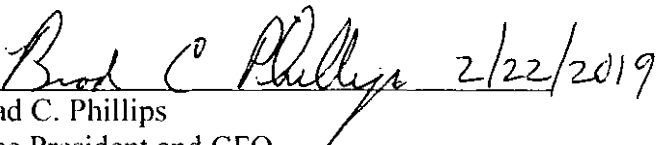
Detailed information about the third-party EGS with which the EMPLOYERS' ENERGY ALLIANCE OF PENNSYLVANIA, INC. works is included as **CONFIDENTIAL** Attachment 4 (Supplier Information).

Response Provided by: Brad Phillips

Date: February 22, 2019

VERIFICATION

I, Brad C. Phillips, 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).



Brad C. Phillips
Vice President and CFO
Manufacturer & Business Association

CERTIFICATE OF SERVICE

On this 22nd day of February 2019, I certify that a true and correct copy of the foregoing responses to the Commission's data requests and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a CD-ROM, upon the following:

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Office of Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

Legal Department
First Energy
2800 Pottsville Pike
Reading, PA 19612

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, PA 19612-2677

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Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

Vasiliki Karandrikas

Vasiliki Karandrikas

Counsel to the EMPLOYERS' ENERGY
ALLIANCE OF PENNSYLVANIA, INC.

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