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Susan E. Bruce  
Direct Dial: 717.237.5254  
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sbruce@mcneeslaw.com

April 16, 2019

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA HAND DELIVERY**

**RE: Application of EnerConnex, LLC, for Approval to Offer, Render, Furnish, or Supply Natural Gas Supply Services as a Broker to the Public in the Commonwealth of Pennsylvania; Docket No. A-2019-3009685**

Dear Secretary Chiavetta:

On March 25, 2019, EnerConnex, LLC ("EnerConnex"), filed the above-captioned Application. Pursuant to the Pennsylvania Public Utility Commission's ("Commission") Secretarial letter dated March 29, 2019, please find enclosed the Bonding Letters from the applicable natural gas distribution companies, which are required for further processing and Commission review of EnerConnex, LLC's Application.

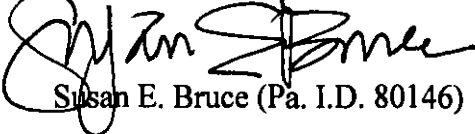
As evidenced by the Certificate of Service, copies of this filing are being duly served on the appropriate parties.

If you have any questions regarding the enclosed documents, please contact the undersigned. 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   
Susan E. Bruce (Pa. I.D. 80146)

Counsel to EnerConnex, LLC

SEB:mas  
Enclosures

c: Certificate of Service

RECEIVED  
2019 APR 16 PM 3:38  
PA PUC  
SECRETARY'S BUREAU  
FRONT DESK

March 28, 2019

Janet Loop  
EnerConnex, LLC  
4140 Clark Shaw Rd  
Powell, OH 43065

RECEIVED

MAY - 1 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Janet Loop:

We are pleased that EnerConnex, LLC 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, EnerConnex, LLC 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. EnerConnex, LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that EnerConnex, LLC 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 EnerConnex, LLC changes in the future, Columbia Gas might deem it appropriate to require EnerConnex, LLC to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4881 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

*Debbie Vair*

Debbie Vair  
Manager, Gas Transportation and Sales Support



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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April 10, 2019

Ms. Janet Loop, CFO  
EnerConnex, LLC  
44 Portland Street, 4<sup>th</sup> Floor  
Worcester, MA 01068  
Email: [jloop@enerconnex.com](mailto:jloop@enerconnex.com)

RE: Security Requirement Bond for EnerConnex, LLC

Dear Ms. Loop:

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

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

/dis



**National Fuel**

March 29, 2019

Eric Niemeyer  
Executive Vice President of Sales  
EnerConnex, LLC  
4140 Clark Shaw Road  
Powell, OH 43065

Re: EnerConnex, LLC

Dear Eric,

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

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

April 2, 2019

EnerConnex, LLC  
4140 Clark Shaw Road  
Powell, OH 43065

Re: Broker Requirements

Dear EnerConnex, LLC

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



375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](http://www.peoples-gas.com)

**Carol Scanlon**  
Manager, Rates & Regulation

**Peoples Service Company LLC**  
Phone: 412-208-6931  
Email: [Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com)

April 5, 2019

Janet Loop  
CFO  
EnerConnex, LLC  
4140 Clark Shaw Road  
Powell, Ohio 43065

Dear Ms. Loop:

We are pleased that EnerConnex, LLC 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 EnerConnex, LLC is not currently serving customers on the Peoples systems, we have determined at this time that EnerConnex, LLC 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 EnerConnex, LLC 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](mailto: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

April 9, 2019

## VIA EMAIL

Ms. Janet Loop, CFO  
EnerConnex, LLC  
44 Portland St., 4<sup>th</sup> Floor  
Worcester, MA 01608  
[jloop@enerconnex.com](mailto:jloop@enerconnex.com)

Dear Ms. Loop:

We understand that EnerConnex, LLC 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 EnerConnex, LLC intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that EnerConnex, LLC 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 EnerConnex, LLC 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



UGI Utilities, Inc.  
1 UGI Drive  
Denver, PA 17517

610-796-3400

VIA E-MAIL

April 12, 2019

EnerConnex, LLC  
44 Portland Street  
4<sup>th</sup> Floor  
Worcester, MA 01068

**ATTENTION: Janet Loop, Chief Financial Officer**

**RE: EnerConnex, LLC  
Application to Serve as a Natural Gas Broker**

Dear Ms. Loop,

Based on your assertion that EnerConnex, LLC ("ENERCONNEX") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc. ("UGIU") has concluded that ENERCONNEX 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 ENERCONNEX 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 ENERCONNEX 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,

A handwritten signature in black ink, appearing to read "David E. Lahoff".

David E. Lahoff  
Senior Manager  
Tariff & Supplier Administration



**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

**VIA FIRST-CLASS MAIL**

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

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

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

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

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

Columbia Gas of PA, Inc.  
Attn: Michele Caddell  
290 W. Nationwide Blvd.  
Columbus, OH 43215

Peoples Natural Gas Company – Equitable Div.  
Peoples Natural Gas Company LLC  
Peoples Gas Company LLC  
Attn: Carol Scanlon  
375 North Shore Drive  
Pittsburgh, PA 15212


National Fuel Gas Distribution Corp.  
Attn: Joanne E. Maciok  
6363 Main Street  
Williamsville, NY 14221

PECO  
Attn: Carlos Thillet  
2301 Market Street, S9-2  
Philadelphia, PA 19103

Philadelphia Gas Works  
Attn: Nicholas LaPergola  
800 West Montgomery Avenue  
Philadelphia, PA 19122

Valley Energy Inc.  
Attn: Ed Rogers  
523 South Keystone Avenue  
Sayre, PA 18840-0340

UGI Utilities, Inc. – Gas Division  
Attn: David Lahoff  
2525 N. 12<sup>th</sup> Street, Suite 360  
P. O. Box 12677  
Reading, PA 19612-2677

  
Susan E. Bruce (Pa. I.D. 80146)

Counsel to EnerConnex, LLC

Dated this 16<sup>th</sup> day of April, 2019, in Harrisburg, PA.

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100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166

## First Class Mail

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120