

RECEIVED 2019 MAY 14 AM 9: 55 PA PUC SECRETARY'S BUREAU

May 8, 2019

PA Public Utility Commission 400 North Street, Keystone Building Harrisburg, PA 17120

RE: Electric Generation Supplier License – Broker / Marketers / Aggregators

Dear Sir or Madam:

Enclosed please find a signed original application on behalf of Sycamore Insurance Agency, Inc. and a searchable CD-ROM as well as check No. 2013156662. Please handle same in your usual manner.

Thank you for your kind attention and attention to this matter. Please feel free to contact me should you have any questions directly at (248) 931-3238.

Thank you.

Sincer

Rochelle Kaplan-Rudolph Assistant Secretary

Enclosure(s)

NLULITED

2019 MAY 14 AM 9: 56

PA PUC SECRETARY'S BUREAU

Version Revised 03/08/18

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of <u>Sycamore Insurance Agency, Inc.</u>; d/b/a \_\_\_\_\_\_, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) <u>[as specified in item #4b below]</u> to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

### 1. IDENTIFICATION AND CONTACT INFORMATION

a. IDENTITY OF THE APPLICANT: Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:

Sycamore Insurance Agency, Inc., 550 Merill St., Ste 200, Birmingham, MI 48009, 248-559-0840

b. PENNSYLVANIA ADDRESS / REGISTERED AGENT: If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

209 Georgian Place, Somerset, PA 15501814-445-8905

c. REGULATORY CONTACT: Provide the name, title, address, telephone number, fax number, and e-mail address of the person to whom questions about this Application should be addressed.

Rochelle Kaplan-Rudolph, Assistant Secretary Sycamore Insurance Agency, Inc. 550 W. Merrill St., Ste 200, Birmingham, MI 48009, 248-262-5997, (F) 248-559-0870, rkaplan@coniferinsurance.com

**d. ATTORNEY**: Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

Not using an attorney.

e. CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS: (Required of ALL Applicants) Provide the name, title, address, telephone number, FAX number, and e-mail <u>OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED)</u> responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Electric Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed EGSs.

Rochelle Kaplan-Rudolph, Assistant Secretary Sycamore Insurance Agency, Inc. 550 W. Merrill St., Ste 200, Birmingham, MI 48009, 248-262-5997, (F) 248-559-0870, <u>rkaplan@coniferinsurance.com</u> and Jennifer Yert (same contact address) 248-262-5982, jyert@coniferinsurance.com

## 2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. FICTITIOUS NAME: (Select appropriate statement and provide supporting documentation as listed.)

The Applicant will be using a fictitious name or doing business as ("d/b/a")

Provide a copy of the Applicant's filing with Pennsylvania's Department of State pursuant to 54 Pa. C.S. §311, Form PA-953.

or

The Applicant will not be using a fictitious name.

#### b. BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:

(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)

The Applicant is a sole proprietor.

If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa.
C.S. §4124 relating to Department of State filing requirements.

or

The Applicant is a:

domestic general partnership (\*)

domestic limited partnership (15 Pa. C.S. §8511)

foreign general or limited partnership (15 Pa. C.S. §4124)

domestic limited liability partnership (15 Pa. C.S. §8201)

foreign limited liability general partnership (15 Pa. C.S. §8211)

foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- \* If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

OF

#### X The Applicant is a:

domestic corporation (15 Pa. C.S. §1308)

X 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.
  - Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
  - Give name and address of officers.

Attached as Exhibit 1 – Articles of Incorporation. Applicant is domiciled in Michigan.

Please see list of Officers and Directors:

Sycamore Insurance Agency, Inc. (MI Domicile)

James G. Petcoff	Director	
Andrew Petcoff	Director / President	
Brian J. Roney	Director / Treasurer	
Nicholas J. Petcoff	Director / Secretary	
B. Matthew Petcoff	Vice President	
Rochelle Kaplan-Rudolph	Assistant Secretary	

# 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.

Applicant is part of an insurance holding company. Please see attached Exhibit 2 – Organizational Chart.

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.

Applicant does not have any predecessors.

# 4. **OPERATIONS**

#### a. APPLICANT'S PRESENT OPERATIONS: (select and complete the appropriate statement)

#### **Definitions**

- Supplier an entity that sells electricity to end-use customers utilizing the jurisdictional transmission and distribution facilities of an EDC.
- Aggregator an entity that purchases electric energy and <u>takes title to electric energy</u> as an intermediary for sale to retail customers.
- Broker/Marketer an entity that acts as an intermediary in the sale and purchase of electric energy <u>but</u> <u>does not take title to electric energy</u>.
- X The Applicant is presently doing business in Pennsylvania as a
  - **u** municipal electric corporation
  - electric cooperative
  - local gas distribution company
  - provider of electric generation, transmission or distribution services
  - broker/marketer engaged in the business of supplying electricity services
  - X Other; Identify the nature of service being rendered.

#### ٥r

The Applicant is not presently doing business in Pennsylvania.

#### b. APPLICANT'S PROPOSED OPERATIONS: The Applicant proposes to operate as a (may check multiple):

- Generator of electricity
- Supplier of electricity
- Aggregator engaged in the business of supplying electricity
- X Broker/Marketer engaged in the business of supplying electricity services
  - X Check here to verify that your organization will not be taking title to the electricity nor will you be making payments for customers.
- Electric Cooperative and supplier of electric power
- Other (Describe):

c. PROPOSED SERVICES: Describe in detail the electric services or the electric generation services which the Applicant proposes to offer.

> Applicant proposes to provide electric and or gas purchasing options to clients currently doing business with applicant and/or applicant's affiliated insurance companies. The Applicant intends to provide an additional risk mitigation option including reducing the cost of policyholders power costs for twelve, twenty-four and/or thirty-six month terms.

d. PROPOSED SERVICE AREA: Check the box of each Electric Distribution Company for which the Applicant proposes to provide service.

Citizens' Electric	Pike
Duquesne Light	
Met-Ed	UGI Utilities
PECO	U Wellsboro
Penelec	🖵 West Penn
Penn Power	
	X Entire Commonwealth of PA

e. CUSTOMERS: Applicant proposes to provide services to:

Х

- Residential Customers
- Small Commercial Customers (25 kW and Under)
- Residential and Small Commercial as Mixed Meter ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)
- Large Commercial Customers (Over 25 kW)
- X Industrial Customers
  - Governmental Customers
  - All of above (Except Mixed Meter)
  - Other (Describe):
- f. START DATE: Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

Upon approval of our license.

### 5. <u>COMPLIANCE</u>

a. CRIMINAL/CIVIL PROCEEDINGS: State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such.

None.

**b. SUMMARY:** If applicable; provide a statement as to the resolution or present status of any such proceedings listed above.

.

Not applicable.

c. CUSTOMER/REGULATORY/PROSECUTORY ACTIONS: Identify all formal or escalated actions or complaints, in the Commonwealth of Pennsylvania or any state, filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. <u>Applicant should also include if it had a Pennsylvania PUC EGS or NGS license previously cancelled by the Commission.</u> If the Applicant has no actions or complaints to list, explicitly state such.

No actions or complaints to list.

d. SUMMARY: If applicable; provide a statement as to the resolution or present status of any actions listed above.

Not applicable.

# 6. PROOF OF SERVICE

**Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.** (Example Certificate of Service is attached at Appendix C)

a. **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

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

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

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

b. EDCs: Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Electric Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each EDC is as follows.

#### Pike County Light & Power Company:

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

#### PECO:

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

#### PPL:

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

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

#### **Duquesne Light:**

Regulatory Affairs Duquesne Light Company 411 Seventh Street, MD 16-4 Pittsburgh, PA 15219 Met-Ed, Penelec, and Penn Power:

Legal Department First Energy 2800 Pottsville Pike Reading PA, 19612

Citizens' Electric Company:

Citizens' Electric Company Attn: EGS Coordination 1775 Industrial Boulevard Lewisburg, PA 17837 UGI: UGI Utilities, Inc. Attn: Rates Dept. – Choice Coordinator 2525 N. 12th Street, Suite 360 Post Office Box 12677 Reading, Pa 19612-2677

#### Wellsboro Electric Company:

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

### 7. FINANCIAL FITNESS

- a. BONDING: In accordance with 66 Pa. C.S. Section 2809(c)(1)(i), the Applicant is required to file a bond or other instrument to ensure its financial responsibilities and obligations as an EGS. Therefore, the Applicant is...
  - Furnishing the **ORIGINAL** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$250,000.
  - Furnishing the **ORIGINAL** of another initial security for Commission approval, to ensure financial responsibility, such as a parental guarantee, in the amount of \$250,000.
  - X For Marketers and Brokers Filing for a modification to the \$250,000 requirement and furnishing the ORIGINAL of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$10,000. Applicant is required to provide information supporting an amount less than \$250,000. Such supporting information must include indication that the Applicant will not take title to electricity and will not pay electricity bills on behalf of its customers. Further details for modification may be described as well.

Please see exhibit 4 – Initial Bond - \$10,000. Applicant will not take title to electricity and will not pay electricity bills on behalf of customers.

#### CRITICAL BONDING NOTES:

Applicant is required to maintain a bond or other financial instrument the entire time it maintains an EGS license with the Commonwealth of Pennsylvania. If Applicant's security instrument is not continuous, Applicant <u>MUST</u> submit a Rider, Amendment, or Continuation Certificate annually based on the expiration date of its security instrument.

At least sixty days (60) prior to the security instrument's expiration date, Applicant should contact Stephen Jakab at <u>siakab@pa.gov</u> to determine the appropriate bonding amount based on a percentage of Applicant's gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. Once the amount has been determined, Applicant should overnight the updated security instrument(s) at least thirty (30) days prior to the expiration date to ensure adequate time for staff review and approval of the security instrument(s).

Template versions of a continuous bond, fixed-term bond, continuous letter of credit, and parental guarantee are attached at Appendix E, F, G, & H, respectively. Applicant's security must follow language from these examples, and must include the unmodified language outlined in Appendix D. Any deviation from these examples must be identified in the application and may not be acceptable to the Commission.

- b. FINANCIAL RECORDS, STATEMENTS, AND RATINGS: Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:
  - Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.
  - Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)
  - Applicant's accounting statements, including balance sheet and income statements for the past two years.
  - Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports.
  - A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee.
  - Audited financial statements exhibiting accounts over a minimum two year period.
  - Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

Please see attached Exhibit 5 - Form 10K on behalf of Applicant's Parent, Conifer Holdings, Inc.

c. SUPPLIER FUNDING METHOD: If Applicant is operating as anything other than <u>Broker/Marketer only</u>, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.

Not applicable.

d. BROKER PAYMENT STRUCTURE: If applicant is a broker/marketer, explain how your organization will be collecting your fees.

Fees will be collected from our partner, Constellation, an Exelon Company.

e. ACCOUNTING RECORDS CUSTODIAN: Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

Harold Meloche, Chief Financial Officer, Conifer Holdings, Inc., 50 W. Merrill St., Ste 200, Birmingham, MI 48009, 248-559-0840, (F) 248-559-0870, hmelchole@cnfrh.com

f. TAXATION: Complete the TAX CERTIFICATION STATEMENT attached as Appendix I to this application.

All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

#### **TECHNICAL FITNESS:** 8.

To ensure that the present quality and availability of service provided by electric utilities does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

#### a. EXPERIENCE, PLAN, STRUCTURE: such information may include:

- Applicant's previous experience in the electricity industry.
- Summary and proof of licenses as a supplier of electric services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

#### b. **PROPOSED MARKETING METHOD** (check all that apply)

- X □ Internal - Applicant will use its own internal resources/employees for marketing
  - External EGS Applicant will contract with a PUC LICENSED EGS broker/marketer
  - Affiliate Applicant will use a NON-EGS affiliate marketing company and or individuals.
  - External Third-Party Applicant will contract with a NON-EGS third party marketing company and or individuals
- Other (Describe):
- c. DOOR TO DOOR SALES: Will the Applicant be implementing door to door sales activities?
  - $\Box$ Yes X No

If yes, will the Applicant be using verification procedures? Not Applicable.

Q	

Yes No

If yes, describe the Applicant's verification procedures.

d. OVERSIGHT OF MARKETING: Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

e. OFFICERS: Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience.

Please see attached Exhibit - 8. Officers resumes.

- f. FERC FILING: Applicant has:
  - Filed an Application with the Federal Energy Regulatory Commission to be a Power Marketer.
  - Received approval from FERC to be a Power Marketer at Docket or Case Number
  - X Not applicable

# 9. DISCLOSURE STATEMENTS:

**Disclosure Statements:** If proposing to serve Residential and/or Small Commercial (under 25 kW) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix J to this Application.

- Electricity should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.

Not applicable for an applicant applying for a license exclusively as a broker/marketer.

## 10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. PJM LOAD SERVING ENTITY REQUIREMENT: As a prospective EGS, the applicant understands that those EGSs which provide retail electric supply service (i.e. takes title to electricity) must provide either:
  - proof of registration as a PJM Load Serving Entity (LSE), or
  - proof of a contractual arrangement with a registered PJM LSE that facilitates the retail electricity services of the EGS.

The Applicant understands that compliance with this requirement must be filed within 120 days of the Applicant receiving a license. As well, the Applicant understands that compliance with this requirement may be filed with this instant application.

(Select only one of the following)

AGREED - Applicant has included compliance with this requirement in the instant application, labeled in correspondence with this section (10).

- AGREED Applicant will provide compliance with this requirement within 120 days of receiving its license
- X ACKNOWLEDGED Applicant is not proposing to provide retail electric supply service at this time, and therefore is not presently obligated to provide such information
- **b. STANDARDS OF CONDUCT AND DISCLOSURE:** As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 54.43, as well as any future amendments.

#### x AGREED

- c. **REPORTING REQUIREMENTS**: Applicant agrees to provide the following information to the Commission or the Department of Revenue, as appropriate:
  - Retail Electricity Choice Activity Reports: The regulations at 52 Pa. Code §§ 54.201--54.204 require that all active EGSs report sales activity information. An EGS will file an annual report reporting for customer groups defined by annual usage. Reports must be filed using the appropriate report form that may be obtained from the PUC's Secretary's Bureau or the forms officer, or may be down-loaded from the PUC's internet web site.
  - Reports of Gross Receipts: Applicant shall report its Pennsylvania intrastate gross receipts to the Commission on a quarterly and year to date basis no later than 30 days following the end of the quarter.
  - The Treasurer or other appropriate officer of Applicant shall transmit to the Department of Revenue by March 15, an annual report, and under oath or affirmation, of the amount of gross receipts received by Applicant during the prior calendar year.
  - Net Metering Reports: Applicant shall be responsible to report any Net Metering per the Standards on <u>http://www.puc.pa.gov/consumer\_info/electricity/alternative\_energy.aspx</u>. Scroll down to the Net Metering Standards Section.
  - Applicant shall report to the Commission the percentages of total electricity supplied by each fuel source on an annual basis per 52 Pa. Code § 54.39(d).
  - Applicant will be required to meet periodic reporting requirements as may be issued by the Commission to fulfill the Commission's duty under Chapter 28 pertaining to reliability and to inform the Governor and Legislature of the progress of the transition to a fully competitive electric market.
  - X AGREED
- d. TRANSFER OF LICENSE: The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. Section 2809(D). Transferee will be required to file the appropriate licensing application.

#### X AGREED

- e. ANNUAL FEES: The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling electricity in the Commonwealth of PA, and an annual supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.
  - X ACKNOWLEDGED
- f. FURTHER DEVELOPMENTS: Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 54.34.
  - X AGREED
- g. FALSIFICATION: The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.
  - X AGREED
- h. NOTIFICATION OF CHANGE: If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within twenty (20) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 54.34.
  - X AGREED
- i. CEASING OF OPERATIONS: Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.
  - X AGREED
- j. Electronic Data Interchange: The Applicant acknowledges the Electronic Data Interchange (EDI) requirements and the relevant contacts for each EDC, as listed at Appendix M.
  - X AGREED
- k. FILING FEE: The Applicant has enclosed or paid the required, non-refundable filing fee by CERTIFIED CHECK OR MONEY ORDER in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. The Commission does not accept corporate or personal checks for filing fees.
  - X PAYMENT ENCLOSED Please see COPY Exhibit 9.

# 11. AFFIDAVITS

#### Must be notarized before filing.

- a. APPLICATION AFFIDAVIT: Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A. Please see Exhibit 10.
- b. OPERATIONS AFFIDAVIT: Provide an officially notarized affidavit stating that you will adhere to the reliability protocols of the North American Electric Reliability Council, the appropriate regional reliability council(s), and the Commission, and that you agree to comply with the operational requirements of the control area(s) within which you provide retail service. An example copy of this Affidavit can be found at Appendix B. Please see Exhibit 10.

# 12. NEWSPAPER PUBLICATIONS

#### Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.

The chart below dictates which newspapers are necessary for each EDC. For example, an applicant that wants to operate in Penn Power would need to run ads in both The Erie Times-News and the Pittsburgh Post-Gazette. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and must be supplied with this application. Applicants do not need a docket number in their publication. Docket numbers will be issued when all criteria on the item 14 checklist (see below) are satisfied.

	Erie Times- News	Harrisburg Patriot- News	Philadelphia Daily News	Pittsburgh Post- Gazette	Scranton Times- Tribune	Williamsport Sun-Gazette	Johnstown Tribune- Democrat
Citizens' Electric						X	
Duquesne				х			
Met Ed		X	X		X		
PECO		,	X				
Penelec	x	X			X	x	x
Penn Power				X			
Pike					X		
PPL		X	x		X	X	
UGI					X		
Wellsboro						x	
West Penn		X		x		x	x
Entire						·	
Commonwealth	<u> </u>	X	x	X	X	X	x

(Example Publications are provided at Appendices K and L) Please see verification – Exhibit 11.

#### 13. SIGNATURE

	ECRE	AH 61(	R
$\Lambda$	1	~	1.11
Applicant, Sycamore Insurance Agency, Inc.	RY	F	Ē
By: ANDREW PETCOH	L'S B	AM	NE
	ه سر	و	CD
Title: President	JRE		
	A	- 55	

ŝ

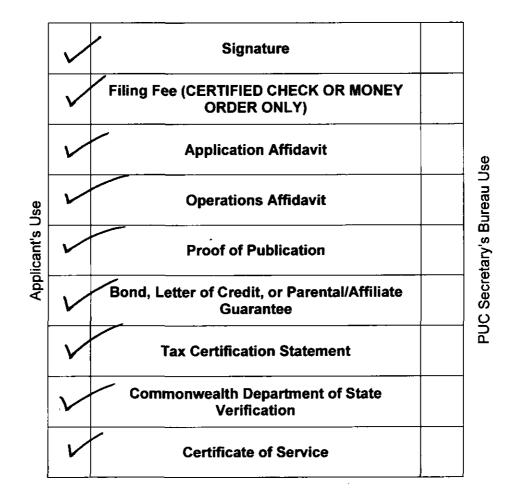
2

t.

### 14. <u>CHECKLIST</u>

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections are complete.

# Applicant: Sycamore Insurance Agency, Inc.



# **Exhibit 1 – Articles of Incorporation of Applicant**

RECEIVED 2019 MAY 14 AM 9:56 PA PUC SECRETARY'S BUREAU

BCS/CD-500 (Rev. 04/11)			-	
MICHIGAN DEF	PARTMENT OF LICENSING AND BUREAU OF COMMERCIAL S		FAIRS	
Date Received	(FOR BUREA	AU USE ONLY		
APR 2 4 2012		MAY 0 9 20	117	
MAY 0 4 2012	This document is effective on the date filed, unle subsequent effective date within 90 days after re date is stated in the document.	ess a eceived Afminietrator	n Info:1 1767374	-1 04/23/12
Name	· · · · · · · · · · · · · · · · · · ·	HURSEN OF COMMERCIALISE ID:	BRIGH UVION / ARCE	559.00
Rochelle Kaplan, Esq.				
Address 26300 Northwestern Highwa			~	
City Southfield		8076 EFFECTIVE DA	ATE:	
	ned to the name and address you enter above. In the returned to the registered office.	3	<u> </u>	
ART For use	TICLES OF INCORPORATION by Domestic Profit Corporation information and instructions on reverse		046-0	OP
•	ct 284, Public Acts of 1972, the undersi	gned executes the follow	ing Articles:	
ARTICLE I	<u> </u>			·,
The name of the corporation				
Sycamore Insurance Agency	y, Inc.	· · · · · · · · · · · · · · · · · · ·		
RTICLE II				
	which the corporation is formed is to eng Inder the Business Corporation Act of Mi		the purposes for wi	20
			ETA	
he total authorized shares:			RY	
1. Common Shares 60,000			ູ່ ສ	
Preferred Shares_0			BUR	ڭ ي
			P P	50
2. A statement of all or any o	f the relative rights, preferences and lim	itations of the shares of e	each class is as f <del>olk</del>	ows:
				<b>.</b>
	<u></u>			
	agent at the registered office is: <u>Rochel</u>	le Kaplan	····	
	location of the registered office is:			,
	lighway, Ste 410, Southfield		Michigan <u>48</u>	076
(Street Address)	(City)	······································		Code)
<ol><li>The mailing address of the</li></ol>	e registered office if different than above	:		
Same		,	Michigan	
(D.O. Boy of Street Address)	(Citv)		- (Zip	Code)

30 ja

#### **ARTICLE V**

The name(s) and address(es) of the incorporator(s) is (are) as follows:		
Name	Residence or Business Address	
Nicholas J. Petcoff	26300 Northwestern Hwy, Ste 410, Southfield, MI 48076	
	·	

## ARTICLE @ (Optional, Delete if not applicable)

When a compromise or arrangement or plan of reorganization of this corporation is proposed between this corporation and its creditors or any class of them or between this corporation and its chareholders or any class of them, a court of equity jurisdiction within the state, on application of this corporation or of a creditor or shareholder thereof, or an application of a receiver appointed for the corporation, may order a meeting of the creditors or class of creditors or of the shareholders or class of chareholders to be affected by the proposed compromise or arrangement or reorganization, to be summoned in such manner as the court directs. If a majority in number representing 3/4 in value of the creditors or class of creditors, or of the shareholders or class of shareholders to be affected by the proposed compromise or arrangement or a reorganization, agree to a compromise or arrangement or a reorganization of this corporation as a consequence of the compromise or arrangement, the compromise or arrangement or the reorganization, if sanctioned by the court to which the application has been made, shall be binding on all the creditors or class of creditors, prion all the chareholders or slage of chareholders and also on this corporation.

# √Ì ARTICLE ชื่i (Optional, Delete if not applicable)

Any action required or permitted by the Act to be taken at an annual or special meeting of shareholders may be taken without a meeting, without prior notice, and without a vote, if consents in writing, setting forth the action so taken, are signed by the holders of outstanding shares having not less than the minimum number of votes that would be necessary to authorize or take the action at a meeting at which all shares entitled to vote on the action were present and voted. A written consent shall bear the date of signature of the shareholder who signs the consent. Written consents are not effective to take corporate action unless within 60 days after the record date for determining shareholders entitled to express consent to or to dissent from a proposal without a meeting, written consents dated not more than 10 days before the record date and signed by a sufficient number of shareholders to take the action are delivered to the corporation. Delivery shall be to the corporation's registered office, its principal place of business, or an officer or agent of the corporation having custody of the minutes of the proceedings of its shareholders. Delivery made to a corporation's registered office shall be by hand or by certified or registered mail, return receipt requested.

Prompt notice of taking of the corporate action without a meeting by less than unanimous written consent shall be given to shareholders who would have been entitled to notice of the shareholder meeting if the action had been taken at a meeting and who have not consented to the action in writing. An electronic transmission consenting to an action must comply with Section 407(3).

Use space below for additional Articles or for continuation of previous Articles. Please identify any Article being continued or added. Attach additional pages if needed.

#### ARTICLE VII

· .

-

No director of the corporation shall be liable to the corporation or its shareholders for monetary damages for breach of fiduciary duty as a director, provided that the foregoing shall not eliminate or limit the liability of the director for any of the following: (1) The amount of a financial benefit received by a director to which he or she is not entitled, (2) intentional infliction of harm on the corporation or its shareholders, (3) a violation of section 551 and/or (4) an intentional criminal act. If the Michigan Business Corporation Act is amended to authorize further elimination or limitation of liability of directors, the the liability of a director of the corporation, in addition to the limitation on personal liability contained in these Articles of Incorporation, shall be eliminated or limited to the fullest extent permitted by the MBCA as so amended. No amendment or repeal of this article shall apply to or have any effect on the liability of the alleged liability of any director of the corporation for or with respect to any acts or omissions of any director occurring before the effective date of any such amendment or repeal.

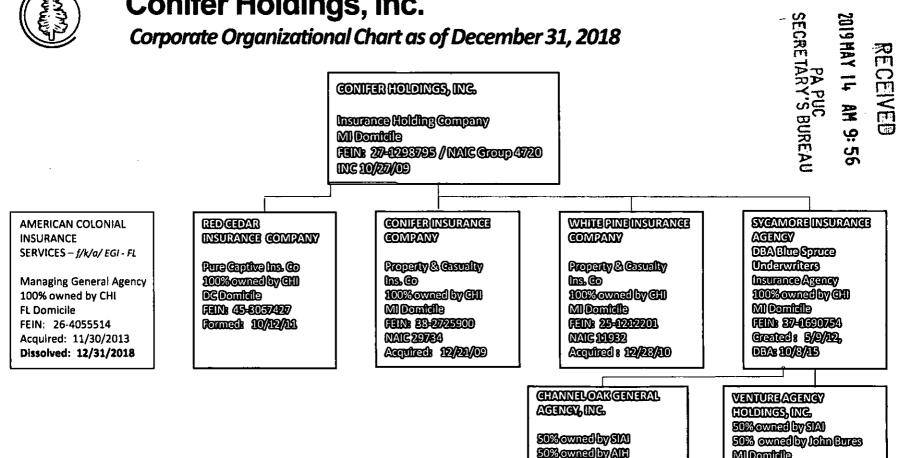
I, (We), the incorporator(s) sign my (our) name(s) this	_2nd_	day of _	Mary	 2012
nan				 
Č				
	<u> </u>			 
<u> </u>				 
	<u> </u>			 
	·			 

# Exhibit 2 – Organizational Chart

•



# **Conifer Holdings, Inc.** Corporate Organizational Chart as of December 31, 2018



Millionialia

FEIN: 81-1092807

Greated: 1/19/2016

MIDomidie

FEIN: 46-2850014

Gened: 12/29/33

NPN: 17419152

۰

<u>Exhibit 5 – Conifer Holdings, Inc. Form 10K</u>

RECEIVED 2019 MAY 14 AM 9:57 PA PUC SEGRETARY'S BUREAU

# Exhibit 7 – Experience, Plan, and Structure

#### EXPERIENCE, PLAN, STRUCTURE: such information may include:

- Applicant's previous experience in the electricity industry.

Applicant does not have any previous experience but will be working closely with Constellation, An Exelon Company which, will be assisting us with the service offers and placement with our current customer base.

 Summary and proof of licenses as a supplier of electric services in other states or jurisdictions.

Applicant is not a supplier of electric services in other states or jurisdictions at this time.

 Type of customers and number of customers Applicant currently serves in other jurisdictions.

Applicant is not a supplier of electric services in other states or jurisdictions at this time.

- Staffing structure and numbers as well as employee training commitments.

Applicant does not intend on having an extensive employee training commitment since Constellation will be handling the processing of the supplying of electric services.

- Business plans for operations within the Commonwealth.

Applicant does not intend on having an extensive employee training commitment since Constellation will be handling the processing of the supplying of electric services. Applicant is an insurance agency with commercial insurance policyholders in the Commonwealth. Applicant, working with Constellation, plans on operating exclusively as a Broker / Marketer and offering alternative electric service options to commercial insureds that will benefit from Constellation's serivces.

Other than Applicant's current insureds, Applicant does not intend on soliciting new business exclusively to supply electric services.

Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.

#### Not applicable because Applicant is not directing supplying the electric services.

Any other information appropriate to ensure the technical capabilities of the Applicant.

# Exhibit 8 – Officer Resume

RECEIVED 2019 HAY 14 AM 9:57 PA PUC SECRETARY'S BUREAU

# Andrew D. Petcoff

PRESIDENT OF SYCAMORE INSURANCE AGENCY, INC.

Andrew D. Petcoff is the President of Sycamore Insurance Agency, Inc., SVP of Personal Lines for Conifer Holdings, Inc. Mr. Petcoff has primary responsibility over personal lines underwriting and marketing. He has been with the Company since 2009 and has over 10 years of experience in the insurance industry. Mr. Petcoff has a B.A. from Mount St. Mary's University and a M.B.A. from Loyola University Maryland. A broad range of functional level expertise in underwriting, marketing, reinsurance, accounting and claims provides Mr. Petcoff with a vision and understanding of how to sustainably grow business with the greatest net effect.

> RECEIVED 2019 HAY 14 AM 9:57 PA PUC SECRETARY'S BUREAU

# Exhibit 9 – Copy of Payment

.

.

.

.

RECEIVED

s ...

-

PA PUC SECRETARY'S BUREAU

# Exhibit 11 – Legal Notice

,

RECEIVED 2019 MAY 14 AM 9:57 PA PUC Secretary's Bureau

# EXAMPLE FORM OF NOTICE PUBLICATION FOR EGS ONLY

## PENNSYLVANIA PUBLIC UTILITY COMMISSION <u>NOTICE</u>

Application of <u>Sycamore Insurance Agency, Inc.</u> For Approval To Offer, Render, Fumish Or Supply Electricity Or Electric Generation Services As A **Marketer/Broker** Engaged In The Business Of Supplying Electricity, And An Aggregator Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.

Sycamore Insurance Agency, Inc. will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as (1) a broker/marketer engaged in the business of supplying electricity. Sycamore Insurance Agency, Inc. proposes to sell electricity and related services in [LIST/EDCS HERE] under the provisions of the new Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Sycamore Insurance Agency**, **Inc.** 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 **Sycamore Insurance Agency**, **Inc.'s** attorney at the address listed below.

By and through Counsel: Richard J. Fiato

# Sycamore Insurance Agency, Inc. 550 West Merrill Street, Suite 200

Birmingham, MI 48009 248-559-0840 248-559-0870

> RECEIVED 2019 HAY 14 AM 9: 58 PA PUC SECRETARY'S BUREA

Exhibit 10 – Affidavits

# **Applicant Affidavit**

.

## Appendix A

# **APPLICATION AFFIDAVIT**

SS.

State of Michigan:

County of Oakland

Andrew D. Petcoff, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

He is the President (Office of Affiant) of Sycamore Insurance Agency. Inc. (Name of Applicant);

That he is authorized to and does make this affidavit for said Applicant;

That the Applicant herein, Sycamore Insurance Agency, Inc. has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as an electric generation supplier pursuant to 66 Pa. C.S. § 2809 (B).

That the Applicant herein, <u>Sycamore Insurance Agency</u>, Inc. has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein, <u>Sycamore Insurance Agency</u>, Inc. acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein, <u>Sycamore Insurance Agency</u>, Inc. acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing

Signature of Affiant

20 19 . Sworn and subscribed before me this day of Signature of official administering olath 2019 HAY 14 **ROCHELLE KAPLAN-RUDOLPH NOTARY PUBLIC - MICHIGAN** My commission expires COUNTY OF OAKLAND My Commission Expires APRIL 16, 2023 AGTING IN THE COUNTY OF È. ف 58

Exhibit 10 – Affidavits

.

**Operations Affidavit** 

Appendix B

# **OPERATIONS AFFIDAVIT**

State of Michigan:

RECEIVED 2019 MAY 14 AM 9:58 PA PUC SECRETARY'S BUREAL

SS.

County of Oakland

<u>Andrew D. Petcoff</u>, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

:

He is the <u>President</u> (Office of Affiant) of <u>Sycamore Insurance Agency, Inc.</u> (Name of Applicant);]

That he is authorized to and does make this affidavit for said Applicant;

That <u>Sycamore Insurance Agency, Inc.</u>, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That <u>Sycamore Insurance Agency, Inc.</u>, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render electric service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That <u>Sycamore Insurance Agency, Inc.</u>, the Applicant herein, certifies to the Commission that it is subject to will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 28 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28, shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional Gross Receipts and power sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

As provided by 66 Pa. C.S. §2810 (C)(6)(iv), Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

# Appendix B (Continued)

That <u>Sycamore Insurance Agency, Inc.</u>, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506, §2807 (C), §2807(D)(2), §2809(B) and the standards and billing practices of 52 PA. Code Chapter 56.

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Bureau of Public Liaison or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.

Signature of Affiant

64 Sworn and subscribed before me this 20 17. day of the

Signature of official administering oath

My commission expires	ROCHELLE KAPLAN-RUDOLPH NOTARY PUBLIC - MICHIGAN
	COUNTY OF OAKLAND My Commission Expires APRIL 16, 2023 ACTING IN THE COUNTY OF

SECRETARY'S BUREAU 2019 MAY 14 AM 9: RECEIVED 58

Exhibit 12 – Legal Notice in Philadelphia Daily News

ť

· ,

.

# RECEIVED

2019 MAY 14 AM 9: 58

PA PUC SECRETARY'S BUREAU

<section-header><section-header><section-header><section-header><text><text><text>

.

## PHILADELPHIA MEDIA NETWÖRK

## The Inquirer DAILY NEWS philly com

801 MARKET STREET, SUITE 300, PHILADELPHIA, PA 19107

Friday, May 03, 2019				. <u>.</u>		
Transaction Type:	Payment	Customer Type:	Transient			
Order Number:	0003393054	Customer Category:				
Payment Method:	Credit Card	Customer Status:	Active			
Bad Debt:	•	Customer Group:	No Customer Group			
Credit Card Number:		Customer Trade:				
Credit Card Expire Date:	the second se	Account Number:	• • • • • • • • •			
Payment Amount:	1,806.00	Phone Number:				
Reference Number:	149268	Company / Individual:	Company			
Effective Date:	5/3/2019	Customer Name:	CONIFER INSURANCE CO			
Category:	Classified					
Credit to Transaction Number:	P1122932	Customer Address:	550 West Merrill St., Suite 200	I		
Invoice Text:						
Invoice Notes:			Birmingham M	I	48009	USA
		Check Number: Routing Number:				

, 13.000 ·

Payment Receipt

RECEIVED 2019 MAY 14 AM 9: 58 PA PUC SECRETARY'S BUREAU

Cindy Jakubowski Legal Advertising Department – Daily News 801 Market St., Suite 300 Philadelphia, PA 19107 215-854-5834 cjakubowski@phillynews.com

# **Invoice for Legal Advertising**

# Philadelphia Media Network dba Phila. Daily News

# AD #3393054

# COST: \$1806.00 for 1x time in the Phila. Daily News

## **RE: MATTER Sycamore Insurance**

### Please check copy and make corrections, if any. Fax OK or corrections back.

Make checks payable to: Philadelphia Daily News or, mail to: (regular mail) Philadelphia Daily News Legal Advertising Department, Attn:Cindy Jakubowski, P.O. Box 8263, Philadelphia, PA 19101.

Federal Express address: Philadelphia Daily News, 801Market Street, Philadelphia, PA 19107, Attention:Cindy Jakubowski, Legal Advertising, (215) 854-5834.

Or call with credit card number.

# Exhibit 12 – Legal Notice in Harrisburg – Patriot News

· · ·

.

.

.

.

Ad Content Proof

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE Application of <u>Sycamore Insurance</u>

Application of <u>Sycamore Insurance</u> <u>Agency, Inc.</u> For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As An Marketer/Broker Engaged in The Business Of Supplying Electricity, And An Aggregator Engaged in The Business Of Supplying Electricity, To The Public in The Commonwealth Of Pennsylvania.

Sycamoré Insurance Agency, Inc. will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as (1) a broker/marketer engaged in the business of supplying electricity. Sycamore insurance Agency, Inc. proposes to sell electricity and related services in PPL, PECO, METED, WestPenn, Duquesne and UGI under the provisions of the new Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial filmess of Sycamore insurance Agency, Inc. 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 Sycamore insurance Agency, Inc.'s attorney at the address listed below.

By and through Counsel: Richard J. Flato Sycamore Insurance Agency, Inc. 550 West Merrill Street, Suite 200 Birmingham, MI 48009 248-559-0840 248-559-0870 1 11 1 2 1 1

# 2019 MAY 14 AM 9:58

PA PUC SECRETARY'S BUREAU

Confidentiality Notice: This facsimile is intended only for its addressee and may contain information that is privileged, confidential or otherwise protected from disclosure. Dissemination, distribution or copying of this facsimile or the information by anyone other than the intended recipient is prohibited. If you have received this facsimile in error, please notify us immediately and return the facsimile by mail

12:16PM

			Order Confirmat Ad Order Number 0009149				59	923
Customer CONIFER HOLDINGS IN(	<b>,</b>		Pavor Customer CONIFER HOLDINGS INC _	<u> </u>	· · · · ·			
Account: CONIFER HOLDINGS IN	e		Account			PO Number		
550 W MERRILL ST STE 200	0		550 W MERRILL ST STE 200			Caloo Boo	Marianna Aldridge	
BIRMINGHAM MI 48009 USA			BIRMINGHAM MI 48009 USA			Sales Rep. Order Taker	Marianna Aldridge	
(248)559-0840			(248)559-0840			Order Source	Phone	
(240)000-0040			(240)008-0040					
						Special Pricing		
FAX: RKaplan@ConiferInsuran	ce.com							
Tear Sheets 0	TearsheetsCost	\$0.00	Net A	mount	\$221.72			
Proofs 0				mount	\$0.00			
Affidavits 1	AffidavitsCost	\$5.00		mount	\$221.72			
Blind Box			Payment I					
Promo Type Materials			Payment A	mount nt Due	\$221.72 \$0.00			
	ore Insurance Agency		Amou	nt Due	<i>\$0.00</i>			
	· ·		Ad Schedule					
	The Patriot News			Main Loopi	•			
# insert			Placement/Class POS/Sub-Class	-				
	t \$214.22		AdNumber					
	PA CLS Legal Liner		Ad Size	1 X 46				
Pick Up 1			Ad Attributes					
External Ad t				<none></none>				
Production Method	AdBooker		Production Notes					
Run Dates Sort Text 05/07/2019	PENNS00PUBLICUTIL	ITYCOMM	ISSIONNOTICEAPPLICATIONO	SYCAMO	REINSURANCEAC	BENCYINCFORAPP	PROVA	
				_				
	t PennLive.com		Placement/Class	-				
# Insert:	s 1 t \$2.50		POS/Sub-Class					
	r 92.50 PA CLS Legal Liner		AdNumber Ad Size	1 X 46				
Pick Up 1			Ad Size Ad Attributes	10.40	**			
External Ad 1				<none></none>				
Production Method			Production Notes					
		ITYCOMM	ISSIONNOTICEAPPLICATIONO	SYCAMO	DREINSURANCEAG	GENCYINCFORAPF	ROVA	

.

Confidentiality Notice: This factimitie is intended only for its addresses and may contain information that is privileged, confidential or otherwise protected from disclosure. Dissemination, distribution or copying of this factimitie or the information by anyone other than the intended recipient is privileged. If you have received this factimitie in error, please notify us immediately and return the factimitie by mail.

# Exhibit 12 – Legal Notice in Scranton Times – Tribute

.

.

. .

THE SCRANTON TIMES DBA THE TIMES TRIBUNE ~PO BOX 3478 SCRANTON PA 18505-0478 (570)348-9183 Fax (570)348-9149

#### ORDER CONFIRMATION (CONTINUED)

Salesperson: VENTURI SHARON	X5270	Printed at 05/03/19 14:46 by svent
-----------------------------	-------	------------------------------------

Acct #: 633716

#### LEGAL NOTICE

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE Application of Sycamore Insurance Agency, Inc. For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A Marketen/Broker Engaged In The Business Of Supplying Electricity, And An Aggregator Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.

Sycamore Insurance Agency, Inc. will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as (1) a broker/marketer engaged in the business of supplying electricity. Sycamore Insurance Agency, Inc. proposes to sell electricity and related services in PPL, PECO, METED, WestPenn, Duquesne and UGI under the provisions of the new Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Sycamore Insurance Agency, Inc.** 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 **Sycamore Insurance Agency, Inc.**'s attorney at the address listed below.

By and through Counsel: Richard J. Fiato Sycamore Insurance Agency, Inc. 550 West Merrill Street, Suite 200 Birminghem, MI 48009 248-559-0840 248-559-0870 Ad #: 82334807

Status: New CHOLD CHOI

THE SCRANTON TIMES DBA THE TIMES TRIBUNE PO BOX 3478 SCRANTON PA 18505-0478 (570)348-9183 Fax (570)348-9149

#### ORDER CONFIRMATION

Salesperso	on: VENTURI SHARON X5270	Printed at 05/03/19	14:46 by svent
Acct #: 63	33716	Ad #: 82334807	Status: New CHOLD
ROCHELLE H	SURANCE COMPANY KAPLAN RILL ST., STE 200 4 MI 48009	Start: 05/06/2019 Times Ord: 1 TSLEG 1.00 X 59.00 Total TSLEG 59.00 Class: X1010 LEGALS Rate: CLL # Affidavits: 1	Times Run: *** Words: 209 5 & PUBLIC NOTICES
Phone: Fax#:	(248)559-0840 (248)559-0870		
Agency:	RKaplan@coniferinsurance.com	Last Changed: svent	
STTT CL	EDT TP RUN DATES 3 S 05/06 3 S 05/06		

#### AUTHORIZATION

Under this agreement rates are subject to change with 30 days notice. In the event of a cancellation before schedule completion, I understand that the rate charged will be based upon the rate for the number of insertions used.

-hd

Name (print or type)

Name (si quature)

(CONTINUED ON NEXT PAGE)

Printed 05/06/19 12:54

---

THE SCRANTON TIMES DBA THE TIMES TRIBUNE PO BOX 3478 SCRANTON PA 18505-0478

,

.

PHONE: 570-348-9183 FAX: 570-348-9149

	Advertising Payn	<u>ent Receipt</u>			
Account number:	633716	Credit Card #:	******		
Account name:	CONFER INSURANCE COMPANY ROCHELLE KAPLAN 550 W MERRILL ST., STE 20 BIRMINGHAM MI 48009	Approval Code: Credit Holder Name:	201940[2626666662] JAMES G PETCOFF		
Phone number:	248-559-0840				
Payment number:	2714091 05/06/19				
Payment date:					
Amount:	282.45				
Payment description:	CREDIT CARD PAYMENT CONFEI	R INSURANCE COMPA	ANY		
Ad Number:	82334807	Class Code:	X1010		
Ad Taker:	svent	Salesperson:	110ST		
First Words:	LEGAL NOTICE PENNSYLVANIA				

ſ

# 2019 MAY 14 AM 9: 58

PA PUC SECRETARY'S BUREAU

(Under act P.L. 877 No 160. July 9,1976) The Scranton Times

Commonwealth of Pennsylvania, County of Lackawanna

CONFER INSURANCE COMPANY **ROCHELLE KAPLAN** 550 W MERRILL ST., STE 200 BIRMINGHAM MI 48009

Account # 633716 Order # 82334807 Ad Price: 278.45

#### LEGAL NOTICE PENNSYLVANIA

Ann Marie Fortese

Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

#### 05/07/2019

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and/ character or publication are true  $(1\pi R)T$ IAN

Sworn and subscribed to before me this 7th day of May A.D., 2019

(Notary Public)

Commonwealth of Pennsylvania - Notary Seal Sharon Venturi, Notary Public Lackawanna County My commission expires February 12, 2022 Commission number 1254228

Member, Pannsylvania Association of Notaries

# Legal Notices

### LEGAL NOTICE

ţ

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE UTILITY COMMISSION NOTICE Application. of Sycamore Insur-ance Agency: Inc. For Approval To Offer, Render, Fumish Or Supply Electricity Or Electric Generation Services As A: Marketar/Broker Engaged In The Business Of Sup-phying Electricity, And An Aggrega-tor Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsyl-vania.

Sycamore Insurance Agency, Inc. will be filing an application with the Pennsylvania Public Utility Com-mission ("PUC") for a license to mission ("PUC") for a license to supply electricity or electric genera-tion services as (1) a broker/mar-keter engaged in the business of supplying electricity. Sycamore In-surance Agency, Inc. proposes to sell electricity and related services sell electricity and related services in PPL, FECO, METED, WestPenn, Duquesne and UGI under the provi-sions of the new Electricity Genera-tion Customer Choice and Competi-tion Act. tion Act.

The PUC may consider this applica-tion without a hearing. Protests di-rected to the technical or financial rected to the technical or tinancial fitness of Sycamore Insurance. Agency, Inc. may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA-17120; Yau should send copies of any protest to Sycamore Insurance protest to Sycamore Insurance Agency, Inc.'s attorney at the ad-dress listed below.

> By and through Counsel: Richard J. Fiato Sycamore Insurance Agency, Inc. 550 West Merrill Street, Suite 200 Birmingham, Mi 48009 248-559-0840 248-559-0870

# **Exhibit 3 – Proof of Service**

RECEIVED

# 2019 MAY 14 AM 9: 56

PA PUC SECRETARY'S BUREAU

## Appendix C

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

## Example CERTIFICATE OF SERVICE

On this the  $1^{m}$  day of  $20^{n}$ , I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as an Electric Generation Supplier and all <u>NON-CONFIDENTIAL</u> 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 Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120

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

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

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

Legal Department First Energy 2800 Pottsville Pike Reading PA, 19612

Citizens' Electric Company Attn: EGS Coordination 1775 Industrial Boulevard Lewisburg, PA 17837 Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120

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

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

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

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

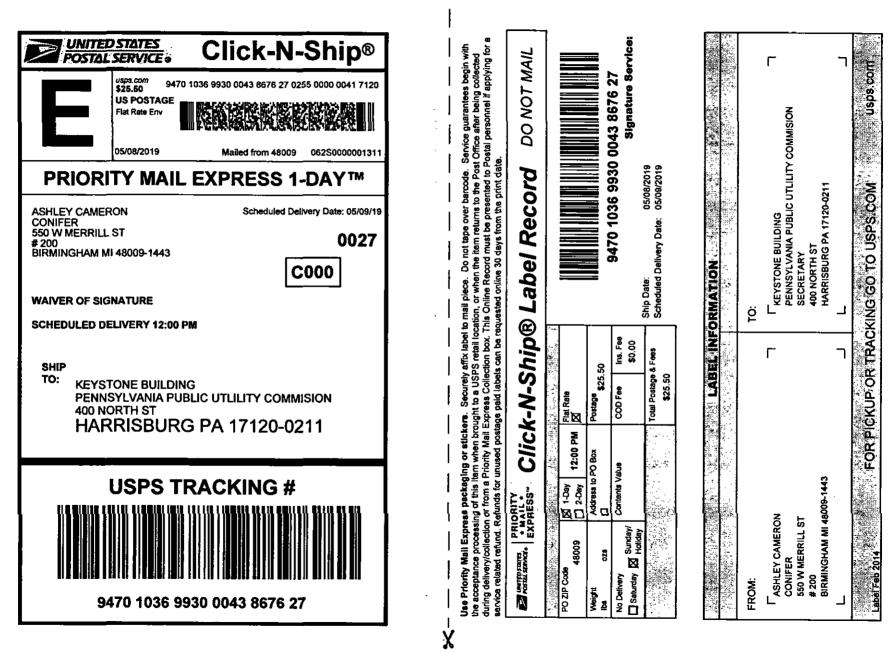
UGI Utilities, Inc. Attn: Rates Dept. – Choice Coordinator 2525 N. 12th Street, Suite 360 Post Office Box 12677 Reading, Pa 19612-2677

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

D. Petcoff, President Andrew

ECRE

BUREA



USPS Employee: For service failure refunds, follow standard refund procedures