



Sycamore Insurance

A-2019-3010469

July 8, 2019

Via overnight mailing

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

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

Dear Ms. Chiavetta:

Pursuant to your letter dated June 27, 2019, the following is in response to questions 1 through 9. As requested please see the enclosed updated application pages with the noted corrections in bold as well as a few attachments. Please review and 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.

Sincerely,

Rochelle Kaplan-Rudolph
Assistant Secretary

RECEIVED

JUL - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Enclosure(s)

RECEIVED

JUL - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. A-2019-3010469
Sycamore Insurance Agency, Inc.
Data Requests

ltr for
SIAT

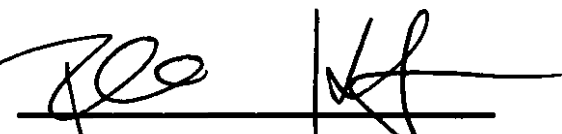
- X Reference Application, Section 1.a, Identity of Applicant – Applicant failed to provide its web address. Also, Applicant’s street address does not match the street address for its regulatory contact. Please provide an updated application page with the appropriate corrections. ✓
- X Reference Application, Section 1.b, PA Address/Registered Agent – Applicant failed to provide a mailing name for the PA address provided. Please provide an updated application page with the appropriate corrections. ✓
- X Reference Application, Section 4.a, Present Operations – Applicant selected Other but failed to identify the nature of the services being rendered. Please file an updated Application page with the requested information. ✓
- 4. 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, two recent consecutive years of income tax filings, and three recent consecutive months of bank statements. ME & NAT (Ink) (ltr) ✓
- 5. Reference Application, Section 8.a, Technical Fitness – Please provide the agreement with Constellation as evidence for Technical Fitness. (not signed ✓)
- X Reference Application, Section 8.d, Technical Fitness – Applicant failed to provide its explanation of ethical procedures. Please provide an updated application page with the appropriate corrections. ✓
- 7. Reference Application, Section 8.e, Technical Fitness – Applicant failed to provide detailed professional resume of its chief officer, to include detailed descriptions on all experience and activities including date ranges. Please provide the missing documentation. ASK ADP
- X Reference Application, Section 12, Notarized Proofs – Applicant failed to provide a notarized proof of publication for the Philadelphia Daily News. Please provide the notarized proof of publication for the above newspaper. ✓
- 9. Reference Application, Section 12, Notarized Proofs – Applicant’s notarized proofs of publication failed to list Citizens’ Electric, Penelec, Penn Power, Pike, and Wellsboro. Applicant must run ads that include the missing electric distribution companies in the Erie Times-News, the Harrisburg Patriot-News, the Pittsburgh Post-Gazette, the Scranton Times-Tribune, the Williamsport Sun-

Gazette, and the Johnstown Tribune-Democrat. Please provide the notarized proofs of publication for the above newspapers.

VERIFIED STATEMENT FOR RESPONSE

I, Rochelle Kaplan-Rudolph, hereby state that the facts within the attached response that are 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. section 4904.

Signed:



Rochelle Kaplan-Rudolph

RECEIVED

JUL - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

JUL - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Version Revised 03/08/18

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Sycamore Insurance Agency, Inc., d/b/a _____, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) [as specified in item #4b below] 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 W. Merrill St., Ste 200, Birmingham, MI 48009, 248-559-0840
Web address: www.sycamore-insurance.com

- 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.

ATTN: Sycamore Insurance Agency, Inc., 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 **OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED)** 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,
rkaplan@coniferinsurance.com and
Jennifer Yert (same contact address) 248-262-5982, jyert@coniferinsurance.com

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 takes title to electric energy 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 but does not take title to electric energy.

X The Applicant is presently doing business in Pennsylvania as a

- 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. **Sycamore Insurance Agency, Inc. will be working with Constellation and assisting Constellation with offering to supply Sycamore Insurance Agency, Inc.'s clients with electricity services.**

OR

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):

RECEIVED

JUL - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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
- Duquesne Light
- Met-Ed
- PECO
- Penelec
- Penn Power

- Pike
- PPL
- UGI Utilities
- Wellsboro
- West Penn

Entire Commonwealth of PA

e. **CUSTOMERS:** Applicant proposes to provide services to:

- 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)**
- X 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.

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.

CONFIDENTIAL LETTER.

Please see attached Exhibit 4 – the letter from the holding company. Also, for financial documents relating to the holding company use the following link:

<https://www.sec.gov/cgi-bin/browseedgar?company=Conifer+Holdings&owner=exclude&action=getcompany>

c. SUPPLIER FUNDING METHOD: If Applicant is operating as anything other than **Broker/Marketer only**, 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.

8. TECHNICAL FITNESS:

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.

Please see Exhibit (5) – CONFIDENTIAL Agreement with Constellation.

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

- 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?

- Yes
- No

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

- 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.

Sycamore will not be directly marketing to any of its employees and/or contractors. Sycamore will only be offering these services to its agent partners and their insureds.

Exhibit 8 – Officer Resume

Andrew D Petcoff

adpetcoff@gmail.com

Birmingham, MI

Mobile Phone: (586) 924-3694

Education

Mount St. Mary's University
BA, May 2005, Business Major

Loyola University of Mary
May 2012, Masters Business Administration

Experience

Conifer Holdings, Inc., Birmingham, MI
Senior Vice President / Director December 2009 – Present

Sycamore Insurance Agency, Inc.
President May 2012 - Present

- Responsible over select underwriting lines, reinsurance, marketing and all agency development for the Company. He has been with Conifer since 2009 and has over 10 years of experience in the insurance industry. A broad range of functional expertise in underwriting, marketing, reinsurance and claims equips Mr. Petcoff with the insight and understanding to sustainably cultivate business with the greatest net effect.

Guy Carpenter & Co., Inc., Edina, MN
Risk Analyst July 2007 – December 2009

- Responsible for large portions of a proposal for a new client account, including preparing the submission, presentation, and providing information to many reinsurance companies
- Completed the Guy Carpenter and Marsh training programs
- Responsible for preparing large portions of the treaty renewal process for several clients including:
 - Preparing submissions to send to reinsurers
 - Reviewing contracts to send to clients and reinsurers
 - Answering any questions from reinsurers about the clients and treaty submissions
 - Organizing and maintaining renewal files for several clients
- Meet with domestic and international reinsurers to discuss the reinsurance market and client renewals
- Meet with prospective clients to discuss their reinsurance programs and other services Guy Carpenter could offer them
- Communicated and worked closely with Guy Carpenter's London branch to service clients and gain access to reinsurance from Lloyds of London Syndicates
- Work with clients dealing with many different lines of business, such as; commercial property and casualty, workers' compensation, medical malpractice, and professional liability
- Work on a professional liability team of 6 with over \$16,000,000 in brokerage
- Work closely with clients ranging in gross written premium between \$3,000,000 and \$150,000,000, and surplus between \$5,000,000 and \$250,000,000

North Pointe Insurance Group, Jacksonville, FL and Southfield, MI
Specialty Underwriter July 2005 – July 2007

- Assisted in the strategic development, implamentation and underwriting of a new national program writing property and casualty insurance for roller skating rinks
- Worked as an underwriter for a national bowling center program writing property, casualty and liquor liability insurance
- Worked closely with the Bowling Proprietors Association of America and the Roller Skating Association
- Worked closely with the legal department to help identify
- Worked closely with internal auditors and outside counsel to ensure Sarbanes Oxley compliance of the underwriting department

Skills

Computer:

- Microsoft Word, Excel, PowerPoint, Access, Lotus Notes

Extra-curricular

Activities

Lacrosse:

- Captain of the 2004-2005 lacrosse season
- Four year letter-winner on the Mount St. Mary's Varsity Lacrosse team that won the Metro Atlantic Athletic conference championship
- Member of the 2003 team that made the NCAA Division I tournament which was the most successful season in school history
- Assistant Varsity Lacrosse Coach at Blake High School in Minneapolis, MN in 2009
- Head Junior Varsity Lacrosse Coach at U of D Jesuit High School in Detroit, MI in 2007 and Assistant Varsity Coach with the 2007 season culminating in a Michigan semi-final appearance
- Assistant Middle School Lacrosse Coach at Academy of the Sacred Heart in Beverly Hills, MI in 2006

Service:

- St. Hugo of the Hills Christmas gift drive 2007
- Warming Hearts 2005, 2006 and 2007
- Habitat for Humanity 2002

Response to Item 8 – Proof of Publication
for the Philadelphia Daily News

RECEIVED

JUL - 9 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

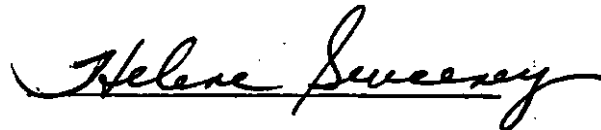
**Proof of Publication in The Philadelphia Daily News
Under Act. No 587, Approved May 16, 1929**

**STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA**

Helene Sweeney being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said newspaper on the following dates:

May 6, 2019

Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.



Sworn to and subscribed before me this 6th day of May, 2019.


Notary Public

My Commission Expires:

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
CINDY JAKUBOWSKI, Notary Public
City of Philadelphia, Phila. County
My Commission Expires November 30, 2020

Copy of Notice of Publication

**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 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.
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. Flato
Sycamore Insurance Agency, Inc.
650 West Merrill Street, Suite 200
Birmingham, MI 48009
248-559-0840
248-559-0870

JUL - 9 2019

11. AFFIDAVITS

Must be notarized before filing.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

- 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. **Please see updates below. We will not be selling to the EDCs in bold.**

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

(Example Publications are provided at Appendices K and L)

 Click-N-Ship®	
P	usps.com 9405 5036 9930 0053 7221 25 0073 5000 0041 7120 \$7.35 US POSTAGE Flat Rate Env
	
07/09/2019	Mailed from 48009 062S0000000310
PRIORITY MAIL 2-DAY™	
ASHLEY CAMERON CONIFER 550 W MERRILL ST # 200 BIRMINGHAM MI 48009-1443	Expected Delivery Date: 07/11/19 0004
Carrier – Leave if No Response	<div style="border: 1px solid black; padding: 2px; display: inline-block;"> C000 </div>
SHIP TO: ROSEMARY CHIAVETTA, SECRETARY PA PUBLIC UTILITY COMMISSION 400 NORTH STREET, KEYSTONE BUILDING HARRISBURG PA 17120-0001	
USPS TRACKING #	
	
9405 5036 9930 0053 7221 25	
Electronic Rate Approved #038555749	

Cut on dotted line.

Instructions

1. Each Click-N-Ship® label is unique. Labels are to be used as printed and used only once. **DO NOT PHOTO COPY OR ALTER LABEL.**
2. Place your label so it does not wrap around the edge of the package.
3. Adhere your label to the package. A self-adhesive label is recommended. If tape or glue is used, **DO NOT TAPE OVER BARCODE.** Be sure all edges are secure.
4. To mail your package with PC Postage®, you may schedule a Package Pickup online, hand to your letter carrier, take to a Post Office™, or drop in a USPS collection box.
5. Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

USPS TRACKING # : 9405 5036 9930 0053 7221 25	
Trans. #: 467801606 Print Date: 07/09/2019 Ship Date: 07/09/2019 Expected Delivery Date: 07/11/2019	Priority Mail® Postage: \$7.35 Total: \$7.35
From: ASHLEY CAMERON CONIFER 550 W MERRILL ST # 200 BIRMINGHAM MI 48009-1443	To: ROSEMARY CHIAVETTA, SECRETARY PA PUBLIC UTILITY COMMISSION 400 NORTH STREET, KEYSTONE BUILDING HARRISBURG PA 17120-0001
<small>* Retail Pricing Priority Mail rates apply. There is no fee for USPS Tracking® service on Priority Mail service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.</small>	



UNITED STATES POSTAL SERVICE®
 Thank you for shipping with the United States Postal Service!
 Check the status of your shipment on the USPS Tracking® page at usps.com