



August 29, 2019

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

Re: Nordic Energy Services, LLC Notification of operational changes for Nordic Energy Services, LLC-
Pennsylvania Electric and Natural Gas Supplier (Dockets No. A-2011-2260255 and A-2017-2637635)

Dear Secretary,

This letter is to inform you of a change in operations for Nordic Energy Services, LLC, from the information provided on the applications in Dockets A-2011-2260255 and A-2017-2637635. Nordic intends to implement door-to-door sales activities to develop and market our services for both natural gas and electricity. Nordic confirms we will be using verification procedures. The information following details Nordic's verification procedures and oversight process to ensure compliance with local, state, and federal laws and regulations.

Please feel free to contact me if you have questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Kelli Singer". The signature is fluid and cursive, with a long horizontal flourish at the end.

Kelli Singer
COO
Nordic Energy Services, LLC
ksinger@nordicenergy-us.com
630-468-7403 (w)
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Door-to-door Verification Procedures and Oversight

Verification procedures and oversight of door-to-door service providers is an important part of an effective compliance management system. Nordic employs door-to-door service providers to develop and market its services. Nordic employs such companies due to resource limitations, as well as to rely on expertise of third parties that would be readily available for Nordic without significant investment.

Nordic is committed to having an effective and comprehensive compliance management system. Nordic understands that its compliance management program must provide oversight of the activities of all door-to-door service providers used in the customer generation process. Nordic also understands that it is responsible for managing the risks associated with these relationships and ensuring that the activities of all door-to-door agents comply with applicable laws.

Nordic will require door-to-door sales agents to have the customer sign our terms and conditions as well as perform a third party verification on all sales.

Nordic has integrated the review of service providers into all aspects of our compliance management program. Before adding a new service provider, Nordic performs a thorough due diligence of the vendor to ensure compliance with consumer protection laws. In particular, Nordic's Compliance Officer or designee reviews the organizational chart to determine reporting structure and responsibilities of key managers. Nordic also reviews qualifications and experience levels of staff, particularly those who interface with consumers. Nordic also reviews publicly available databases for any complaints about the provider. Finally, Nordic requires that all door-to-door vendors perform background checks on their employees.

If the door-to-door company meets compliance standards, Nordic details clear expectations about compliance with federal consumer protection laws and appropriate penalties for any violations in all contracts with door-to-door companies. Nordic's Compliance Officer and/or legal counsel reviews all agreements with door-to-door companies for compliance with consumer protection laws.

Nordic's compliance program ensures that all door-to-door agents are trained and monitored on a regular basis. In addition, Nordic will randomly audit customer signed contract documents and TPV's on a weekly basis.

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NORDIC ENERGY SERVICES LLC
ONE TOWER LANE
SUITE 300
OAKBROOK TERRACE, IL 60181
UNITED STATES US

SHIP DATE: 29AUG19
ACTWGT: 0.10 LB
CAD: 4100196/NET4160

BILL SENDER

TO **SECRETARY**
PA PUBLIC UTILITY COMMISSION
400 NORTH STREET, KEYSTONE BUILDING

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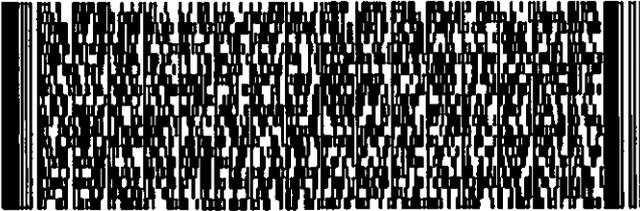
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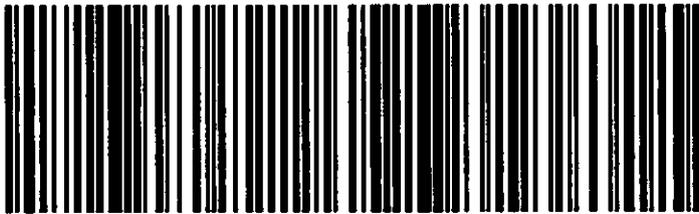


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