

Phone: 330 995-2675 Toll Free: 888 862-6060 Fax: 800-574-4508 naturalgas-electric.com

Dear Secretary Chiavetta,

A-2019-3013217

Please find the enclosed corrections to our application to provide natural gas supply services as a Broker/Marketer to the public in the Commonwealth of Pennsylvania.

- An original signature has been provided on the Certificate of Service.
- Bonding Letters have been provided for all 7 natural gas utility companies.

Appendix C

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

CERTIFICATE OF SERVICE TEMPLATE

On this the 4th day of September 2019, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all NON-CONFIDENTIAL attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

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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
Office of the Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101	Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946
Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com	Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120
Peoples Natural Gas Company LLC - Equitable Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com	National Fuel Gas Distribution Corp. Joanne E. Maciok 6363 Main Street Williamsville, NY 14221 PH: 716.857.7670 FAX: 716.857.7479 e-mail: maciokj@natfuel.com
Peoples Natural Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com	PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com
Peoples Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com	Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com

Valley Energy Inc.

Ed Rogers

523 South Keystone Avenue

Sayre, PA 18840-0340

PH: 570.888-9664 FAX: 570.888.6199

email: erogers@ctenterprises.org

UGI Utilities, Inc. - Gas Division

David Lahoff

2525 N. 12th Street, Suite 360

Reading, PA 19612-2677

PH: 610.796.3520

Email: dlahoff@ugi.com

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RECEIVED

Columbia Gas. of Pennsylvania

SEP **26** 2019

A NiSource Company

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

September 11, 2019

Mark R. Burns Independent Energy Consultants, Inc. 215 W Garfield Rd, STE 210 Aurora, OH 44202

Dear Mark R. Burns:

We are pleased that Independent Energy Consultants, Inc. has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Independent Energy Consultants, Inc. could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. Independent Energy Consultants, Inc. has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Independent Energy Consultants, Inc. does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to Independent Energy Consultants, Inc. changes in the future, Columbia Gas might deem it appropriate to require Independent Energy Consultants, Inc. to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4980 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

Kylia Davis

Kylia Davis

Manager of Choice and Transportation Support Services



September 13, 2019

Mark R. Burns, President 215 West Garfield, Suite 210 Aurora, OH 44202

Re: Independent Energy Consultants, Inc.

Dear Mark,

National Fuel Gas Distribution Corporation ("NFGDC") is aware Independent Energy Consultants, Inc. (IEC) has filed an application with the Pennsylvania Public Utility Commission to supply natural gas service to the public in Pennsylvania and specifically within the service territory of NFGDC.

As you know, in making such an application, IEC must furnish acceptable security to each utility where IEC will do business. As such, under its tariff, NFGDC could require IEC to provide a bond or other financial security instrument in an amount that NFGDC determines to be appropriate.

However, you have indicated, and it is NFGDC's understanding that IEC intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, IEC will never take title to any delivered natural gas.

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

If you have any questions concerning the foregoing, please contact me at 716-857-7541.

Yours truly,

Nicole Barker

Transportation Services Department

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September 13, 2019

Independent Energy Consultants 215 W. Garfield Road Suite 210 Aurora, OH 44202

Re: Broker Requirements

Dear Independent Energy Consultants:

PECO is aware that Independent Energy Consultants has applied for a license to provide brokering and consulting services to commercial and industrial customers on the distribution system of PECO.

In making such an application, Independent Energy Consultants could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Independent Energy Consultants has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers, and will not take title to any delivered natural gas; nor will accept any customer payments or deposits. Therefore, PECO has determined at this time that Independent Energy Consultants does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by Independent Energy Consultants the creditworthiness requirement for PECO's exposure to Independent Energy Consultants changes in the future, PECO reserves the right to require Independent Energy Consultants to provide a bond or other financial security instrument.

If you should have any questions regarding this matter, please contact Chris Sauerbaum at 215-841-6422 or myself at 215-841-6452.

Respectfully submitted,

Carlos O. Thille

Carlos P. Thillet

Manager, Gas Supply and Transportation

2301 Market Street Philadelphia, Pa 19103



Carol Scanlon Manager, Rates & Regulation

Peoples Service Company LLC
Phone: 412-208-6931
Email: Carol.Scanlon@peoples-gas.com

September 13, 2019

Mark Burns
President
Independent Energy Consultants, Inc.
215 W Garfield Road STE 210
Aurora, Ohio 44202

Dear Mr. Burns:

We are pleased that Independent Energy Consultants, Inc. has applied for a license to provide natural gas services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division, and Peoples Gas Company LLC (formerly Peoples TWP) ("the Companies").

Since Independent Energy Consultants, Inc. is not currently serving customers on the Peoples systems, we have determined at this time that Independent Energy Consultants, Inc. does not need a bond or other financial security requirement to provide these services to the Company's customers.

If a Pool is established, and customers are enrolled which alters the creditworthiness requirement or the Company's exposure to Independent Energy Consultants, Inc. provision of services on the Peoples' system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

If you have any questions feel free to contact me at 412-208-6931 or by email at Carol.Scanlon@peoples-gas.com.

Sincerely,

Carol Scanlon

Manager, Rates and Regulation
Peoples Natural Gas Company LLC

Cc: Stephen Kelly
Mina Speicher

September 13, 2019

VIA EMAIL

Mr. Eric Burns, Operations Manager, CEP Independent Energy Consultant, Inc. eburns@naturalgas-electric.com

Dear Mr. Burns:

We understand that Independent Energy Consultant, Inc. has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania including our company's service area.

Because Independent Energy Consultant, Inc. intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Independent Energy Consultant, Inc. will not be required to post a bond or other form of financial security instrument to provide these services in our service area. However, if the services provided change in the future, we reserve the right to require security from Independent Energy Consultant, Inc. as deemed appropriate.

If you have any questions, please contact Jamie Levering at 570-888-9664 (Ext. 5232).

Sincerely,

Edward E. Rogers

President & CEO

EER/ss

cc: J. Levering, Valley Energy



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

610-796-3400

VIA E-MAIL

September 18, 2019

Independent Energy Consultants, Inc. 215 W. Garfield Road Suite 210 Aurora, OH 44202

ATTENTION:

Mark Burns, President

RE:

Independent Energy Consultants, Inc.

Application to Serve as a Natural Gas Broker

Dear Mr. Burns,

Based on your assertion that Independent Energy Consultants, Inc. ("Independent Energy") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc. ("UGIU") has concluded that Independent Energy will not need to post security with UGI Utilities, Inc. – South Rate District ("UGI South"), UGI Utilities, Inc. – North Rate District ("UGI North") or UGI Utilities, Inc. – Central Rate District ("UGI Central"). This is based on the declaration that Independent Energy will be acting in conjunction with a licensed Natural Gas Supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the respective UGIU Tariffs. If Independent Energy wishes to directly serve Choice customers in the service territories of UGI South, UGI North and/or UGI Central in the future as a natural gas supplier, it will have to post security as specified in the respective UGI Tariffs prior to the commencement of the service.

Please feel free to contact me with any additional questions you may have.

Sincerely,

David E. Lahoff Senior Manager

Tariff & Supplier Administration



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

September 19, 2019

Mr. Mark R. Burns, President
Independent Energy Consultants, Inc.
215 W. Garfield Road
Suite 210
Aurora, OH 44202

Email: eburns@naturalgas-electric.com

RE: Security Requirement Bond for Independent Energy Consultants, Inc.

Dear Mr. Burns:

Philadelphia Gas Works ("PGW") is aware that Independent Energy Consultants, Inc. has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works.

As you know, in making such an application, Independent Energy Consultants, Inc. must furnish acceptable security to each utility where Independent Energy Consultants, Inc. will do business. As such, under its tariff, Philadelphia Gas Works could require Independent Energy Consultants, Inc. to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate.

However, you have indicated, and it is Philadelphia Gas Works' understanding, that Independent Energy Consultants, Inc. intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services Independent Energy Consultants, Inc. will never take title to any delivered natural gas.

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

If you have any questions concerning the foregoing, please contact me at 215-684-6725.

Sincerely,

JOHN ZUK

Vice President, Gas Supply

/dls

Independent Energy Consultants 215 W. Garfield Road Suite 210 Aurora, OH 44202





Commonwealth of Pennsylvania Pennsylvania Public Utility Commission Attn: Secretary Chiavetta 400 North Street Harrisburg, PA 17120