

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of United Energy Trading, LLC d/b/a Kratos Gas & Power for approval to offer, render, furnish, or supply natural gas supply services as a Supplier or Aggregator of natural gas services 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:

United Energy Trading d/b/a Kratos Gas & Power ("UET"), LLC, 919 South 7th Street, Suite 405, Bismarck, North Dakota 58504, <http://www.unitedenergytrading.com/>, (701) 250-9367.

- 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.

LEGALINC CORPORATE SERVICES INC.
606 Liberty Avenue, 3rd Floor #107
Pittsburgh, Pennsylvania 15222
(844) 830-8267

- 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.

Matthew J. Lindsay, Associate General Counsel, 225 Union Boulevard, Suite 200, Lakewood, Colorado 80228, Telephone: (303) 634-7410, Fax: (303) 991-0988, mlindsay@uetllc.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.

Matthew J. Lindsay, Associate General Counsel, 225 Union Boulevard, Suite 200, Lakewood, Colorado 80228, Telephone: (303) 634-7410, Fax: (303) 991-0988, mlindsay@uetllc.com.

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** 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 Natural Gas 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 NGSs.

1. Stephen Shortell
Customer Service Representative
225 Union Boulevard, Suite 200, Lakewood, Colorado 80228
Telephone: (720) 897-4758
Fax: (303) 991-0988
sshortell@uetllc.com

2. Mike Huggins
Managing Director
225 Union Boulevard, Suite 200, Lakewood, Colorado 80228
Telephone: (720) 897-4746
Facsimile: (303) 991-0988
mhuggins@uetllc.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.

Please see the Registration of Fictitious Name attached hereto as Exhibit "2A."

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.

or

The Applicant is a:

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

Please see the Certificate of Registration from the Department of State, attached hereto as Exhibit "2B-1."

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

Please see United Energy Trading, LLC's Certificate of Good Standing with the State of North Dakota, attached hereto as Exhibit "2B-2."

- Give name and address of officers.

Confidential Information that will be submitted separately as Exhibit "2B-3" pursuant to the Application instructions.

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.

- United Energy Corporation, 919 South 7th Street, Suite 405, Bismarck, ND 58504 (not a jurisdictional public utility)
- Rainbow Gas Company, 919 South 7th Street, Suite 405, Bismarck, ND 58504 (not a jurisdictional public utility)
- Missouri River Royalty Company, 919 South 7th Street, Suite 405, Bismarck, ND 58504 (not a jurisdictional public utility)
- UET RR, LLC, 919 South 7th Street, Suite 405, Bismarck, ND 58504 (not a jurisdictional public utility)
- UET Midstream, LLC, 919 South 7th Street, Suite 405, Bismarck, ND 58504 (not a jurisdictional public utility)

- Spartan Marketing Group, LLC, 919 South 7th Street, Suite 405, Bismarck, ND 58504 (not a jurisdictional public utility)
- UET Mexico Holdings, LLC, 919 South 7th Street, Suite 405, Bismarck, ND 58504 (not a jurisdictional public utility)
- UET Mexico, S. de R.L. de C.V., Avenida Prolongacion Division del North 4020-201, Colonia El Parque, Delegacion Coyocan, Zip Code 04899, Mexico City, Mexico (not a jurisdictional public utility)

The applicant does not have any affiliates that are currently applying to do business in Pennsylvania.

- 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.

The applicant does not have any predecessors that have done business.

4. OPERATIONS

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

Definitions

- Supplier – an entity which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of an natural gas distribution company
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of natural gas but does not take title to the natural gas.

The Applicant is presently doing business in Pennsylvania as a

- natural gas interstate pipeline
- municipality providing service outside its municipal limits
- local gas distribution company
- retail supplier of natural gas services in the Commonwealth
- a natural gas producer
- a broker/marketer engaged in the business of supplying natural gas services
- Other. (Identify the nature of service being rendered)

OR

The Applicant is not presently doing business in Pennsylvania.

- b. APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a:

- Supplier or Aggregator of natural gas services
- Municipal supplier of natural gas services

- Cooperative supplier of natural gas services
- Broker/Marketer engaged in the business of supplying natural gas services
 - Check here to verify that your organization will not be taking title to the natural gas nor will you be making payments for customers.
- Other (Describe):

c. PROPOSED SERVICES: Describe in detail the natural gas supply services which the Applicant proposes to offer.

UET plans to supply commercial, Industrial, and residential customers with Natural Gas. UET will offer a variety of pricing options including index-based pricing, fixed pricing, trigger rights and optionality. UET will also provide customer service, and in some cases, billing services.

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

- | | |
|--|---|
| <input type="checkbox"/> Columbia | <input type="checkbox"/> Peoples Gas Company |
| <input type="checkbox"/> National Fuel Gas | <input type="checkbox"/> Philadelphia Gas Works |
| <input type="checkbox"/> PECO | <input type="checkbox"/> UGI Utilities – Gas Division |
| <input type="checkbox"/> Peoples Natural Gas Company | <input type="checkbox"/> Valley Energy |
| <input type="checkbox"/> Peoples Natural Gas – Equitable Div | |
| | <input checked="" type="checkbox"/> All of the above |

e. CUSTOMERS: Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)
- Residential and Small Commercial as Mixed Meter ONLY **(CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)**
- Large Commercial Customers - (6,000 Mcf or more annually)
- 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.

October 1, 2019

5. COMPLIANCE

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.

No.

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.

N/A

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

N/A

- c. CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints 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. **Applicant should also include if it had a Pennsylvania PUC EGS or NGS license previously cancelled by the Commission.** If the Applicant has no actions or complaints to list, explicitly state such.

On November 9, 2018, UET received correspondence from the Ohio Public Utilities Commission's staff regarding an investigation.

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

UET responded to the Ohio PUC staff's inquiry on December 3, 2018, and no further action was taken against UET.

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:

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

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

b.) **NGDCs:** 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 Natural Gas 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 NGDC is as follows.

Please see the attached Certificate of Service.

<p>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</p>	
<p>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</p>	<p>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</p>
<p>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</p>	<p>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</p>
<p>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</p>	<p>Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com</p>
<p>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</p>	<p>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</p>

7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require. The contact information is located in Section 6.b.

Confidential Information that will be submitted separately as Exhibit "7A" pursuant to the Application instructions.

- 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.

Confidential Information that will be submitted separately as Exhibit "7B-1" pursuant to the Application instructions.

- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)

Applicant (and its parent company) is not a publicly traded company. As such, neither Applicant nor its parent company have published financials.

- Applicant's accounting statements, including balance sheet and income statements for the past two years.

Confidential Information that will be submitted separately as Exhibit "7B-2" pursuant to the Application instructions.

- 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.

UET is not rated by S&P or Moody's debt rating services as it has no long-term debt and is a privately held company.

- 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.

Confidential Information that will be submitted separately as Exhibit "7B-3" pursuant to the Application instructions.

- Audited financial statements exhibiting accounts over a minimum two year period.

Confidential Information that will be submitted separately as Exhibit "7B-2" pursuant to the Application instructions.

- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

Confidential Information that will be submitted separately as Exhibit "7B-2" pursuant to the Application instructions.

- 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.

Confidential Information that will be submitted separately as Exhibit "7B-2" pursuant to the Application instructions.

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

N/A.

- 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.

Dave Sandy, Financial Controller, 919 South 7th Street, Suite 405, Bismarck, ND 58504, Telephone: (701) 214-6458, Fax: (701) 557-3346, dsandy@uetllc.com.

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D 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.

Please see the Tax Certification Statement attached hereto as Exhibit "7F."

8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by natural gas distribution companies 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 natural gas industry.

United Energy Trading is a fully integrated energy marketing and trading organization. UET is active in marketing natural gas and crude oil, as well as related transportation and transmission services throughout the US and Canada. UET leverages its extensive experience maintaining transport, storage, production, and structured products to provide retail natural gas customers the flexibility to meet their individual business needs as well as the dependability and savings they deserve. Under the trade names Blue Spruce Energy in California, and Kratos Gas & Power in Ohio, Georgia and Michigan. UET has been successfully empowering its customers to save money by choosing UET as their natural gas supplier.

- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
 - Georgia – UET has been licensed to market and provide natural gas commodity sales service to retail customers who receive firm service since September 20, 2012, as evidenced by the attached Exhibit "8A-1."
 - Nebraska – UET has been licensed to operate as a competitive natural gas provider within the State of Nebraska since December 8, 2015. Please see the Order granting such license, attached hereto as Exhibit "8A-2."

- Michigan – UET has been licensed to operate as an alternative gas supplier in Michigan since April 15, 2014. Please see the Order granting such license, attached hereto as Exhibit “8A-3.”
- California – UET is a registered Core Transport Agent in California: https://www.cpuc.ca.gov/uploadedFiles/CPUC_Website/Content/Utilities_and_Industries/Energy/Energy_Programs/Gas/Natural_Gas_Market/CTA_Reg_Form_05-2019.pdf
- Ohio – Please see the Ohio Competitive Retail Natural Gas Marketer Certificate, effective February 27, 2019, through February 27, 2021, attached hereto as Exhibit “8A-4.”

- Type of customers and number of customers Applicant currently served in other jurisdictions.

Confidential Information that will be submitted separately as Exhibit “8A-5.”

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

UET will have an adequate number of traders and 24-hour schedulers, all of whom will undergo annual training.

- Business plans for operations within the Commonwealth.

UET will initially be serving transport customers of the utilities and will be moving into residential sales.

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

N/A

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

- Internal – Applicant will use its own internal resources/employees for marketing
- External NGS – Applicant will contract with a **PUC LICENSED NGS**
- Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
- External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or non-selling marketer**
- 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?

- 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.

UET has in place a robust compliance program and risk policy; an Employee handbook; and a Code of Conduct that must be signed by all employees. UET also works with all its subcontractors to ensure they have similar safeguards in place.

- 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 the Key Personnel identified on the attached Exhibit "8E."

9. DISCLOSURE STATEMENT:

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

DISCLOSURE STATEMENTS: If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas 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.

Please see the attached Appendix "E."

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **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 § 62.114.

AGREED

- b. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission:
 - Reports of Gross Receipts: Applicant shall file an annual report with the Commission on an annual basis no later than April 30th following the end of the calendar year per 52 Pa. Code § 62.110.

AGREED

- c. **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. § 2208(d). Transferee will be required to file the appropriate licensing application.

AGREED

d. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling natural gas in the Commonwealth of PA, and a supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.

ACKNOWLEDGED

e. **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 § 62.105.

AGREED

f. **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.

AGREED

g. **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 thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.

AGREED

h. **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.

AGREED

i. **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.

PAYMENT ENCLOSED

11. AFFIDAVITS
(All 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 attached Appendix A.

- b.) OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the Public Utility Code of Pennsylvania and applicable federal and state laws. An example copy of this Affidavit can be found at Appendix B.

Please see attached Appendix B.

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 NGDC. For example, an applicant that wants to operate in Peoples – Equitable 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.

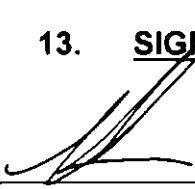
The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and must be supplied with this application. Applicants do not need a docket number in their publication. Docket numbers will be issued when all criteria on the item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

Please see the attached Exhibit "12."

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Columbia Gas	X	X		X		X	X
National Fuel Gas	X			X			
PECO			X				
Peoples - Equitable	X			X			
Peoples Natural Gas	X			X			X
Peoples Gas Company				X			
Philadelphia Gas Works			X				
UGI Utilities – Gas Div.	X	X	X	X	X	X	X
Valley Energy					X	X	
Entire Commonwealth	X	X	X	X	X	X	X

(Example Publications are provided at Appendices F and G)

13. SIGNATURE

Applicant:  _____
 By: Thomas Williams _____
 Title: President _____

14. CHECKLIST

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 is complete.

Applicant: United Energy Trading, LLC

Applicant's Use	Signature	
	Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)	
	Application Affidavit	
	Operations Affidavit	
	Proof of Publication	
	Tax Certification Statement	
	Commonwealth Department of State Verification	
	Certificate of Service	

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

RECEIVED

SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

State of Colorado:

: ss.

County of _____

Thomas Williams, Affiant, being duly sworn according to law, deposes and says that:

He is the President of United Energy Trading, LLC;

He is authorized to and does make this affidavit for United Energy Trading, LLC;

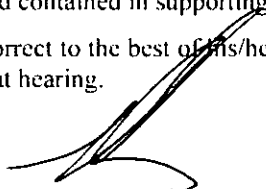
That the Applicant herein, United Energy Trading, LLC, has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein, United Energy Trading, LLC, has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein, United Energy Trading, LLC, acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

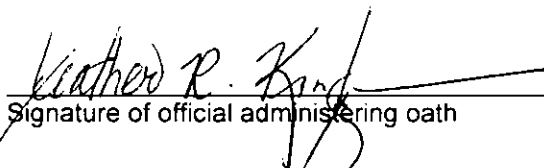
That the Applicant herein, United Energy Trading, LLC, acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

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

Sworn and subscribed before me this 26TH day of SEPTEMBER, 2019.



Signature of official administering oath

My commission expires 7-22-2021

HEATHER R KINGHORN
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20024010707
MY COMMISSION EXPIRES APRIL 22, 2021

Appendix B

OPERATIONS AFFIDAVIT

State of Colorado :

ss.

County of _____ :

Thomas Williams, Affiant, being duly sworn according to law, deposes and says that:

He is the President of United Energy Trading, LLC;

He is authorized to and does make this affidavit for United Energy Trading, LLC;

That United Energy Trading, LLC, 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 United Energy Trading, LLC, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply 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 United Energy Trading, LLC, 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 22 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 natural gas 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).

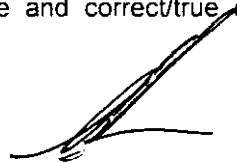
Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That United Energy Trading, LLC, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 and the standards and billing practices of 52 PA. Code Chapter 56.

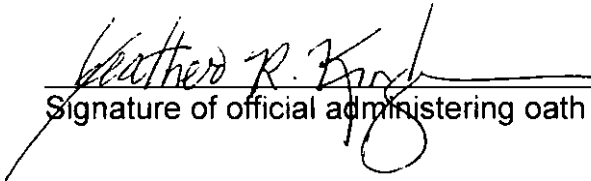
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the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

Sworn and subscribed before me this 20th day of SEPTEMBER, 2019.



Signature of official administering oath

My commission expires 4-22-2021

HEATHER R KINGHORN NOTARY PUBLIC STATE OF COLORADO NOTARY ID 20024010707 MY COMMISSION EXPIRES APRIL 22, 2021

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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix E

Disclosure Statement Format for Natural Gas Suppliers

This is an agreement for natural gas services, between United Energy Trading, LLC d/b/a Kratos Gas & Power and (*customer's name and full address*).

Background

We at (*NGS name*) are licensed by the Pennsylvania Public Utility Commission to offer and supply natural gas services in Pennsylvania. Our PUC license number is (*A-XXXX-XXXXXXX*).

- Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution or delivery prices and services.

Include one of the two following options:

- You will receive a single bill from (*billing agent name*) that will contain (*NGDC name*) charges and (*NGS name*) charges.
 - You will receive a separate bill from (*NGS name*) for generation charges and a separate bill from (*NGDC name*) for its charges.
- Right of Rescission - you may cancel this agreement at any time before midnight of the third business day after receiving this disclosure. You can contact us by phone, in writing or electronically (if available) to cancel this agreement. See Section (X) for how to contact us.

Definitions

Define any terms that may not be commonly understood by consumers. See the glossary on www.pagasswitch.com for standard definitions.

- Commodity charges: *The charges for basic gas supply service which is sold either by volume (Ccf or Mcf) or heating value (Dekatherms).*
- Nonbasic Charges - *Define each nonbasic service being offered.*

Terms of Service

1. (a) **Basic Service Prices** - *Itemize Basic Services you are billing for and their prices.*

Include one of the following options:

FIXED PRICE: You will pay (NGS Price) per (Mcf/Dth/ccf) for the commodity of natural gas.

- *Explain what is included in this price. The NGS's basic service price should include everything that is included in the NGDC's Price-to-Compare. Suggested language: "This price includes natural gas commodity charges, estimated Total State Taxes, but excludes applicable state and local Sales Tax."*

VARIABLE PRICE: You will pay a variable price that can change (monthly, quarterly, etc.). The price for the first billing period will be (NGS price).

- *Explain what is included in this price. The NGS's basic service price should include everything that is included in the NGDC's Price-to-Compare. Suggested language: "This price includes natural gas commodity charges and estimated Total State Taxes, but excludes applicable state and local Sales Tax."*
- *Suppliers are to include any variable pricing conditions and limits. If there are no limits, the NGS shall clearly and conspicuously state that there is no limit on how much the price may change from one billing cycle to the next. Information on the limits of price variability, or the lack of limits, must appear in a larger type size. The customer also needs to be informed of when and how they will receive notification of price changes. For example, if the customer is not going to be notified of price changes until the new price appears on their bill, the customer should be informed of this. If the customer will be receiving advance notice of price changes, the customer should be told when and how these notices will be provided.*
- *More information about this variable price product, including what this price has been for the past 24 months, can be found at (www.companywebsite.com) or you can call ((XXX) XXX-XXXX). However, please remember that past prices do not indicate present or future prices.*

INTRODUCTORY PRICE: You will pay an Introductory Price of (NGS Price) per (Mcf/Dth/ccf) for the commodity of natural gas for the first XX months/billing cycles. After this Introductory Price expires, you will pay (NGS Price) per (Mcf/Dth/ccf) for the commodity of natural gas.

- *Explain what is included in this price. The NGS's basic service price should include everything that is included in the NGDC's Price-to-Compare. Suggested language: "This price includes natural gas commodity charges and estimated Total State Taxes, but excludes applicable state and local Sales Tax."*

If the price is variable, the information found above concerning VARIABLE PRICES must be included.

(b) Other Basic and Nonbasic Service Prices - *Itemize other Basic and Nonbasic Services you are offering and their prices. This includes any monthly fees, if applicable.*

2. Length of Agreement

Include one of the following two options:

Fixed Duration/Length Agreement — You will buy your natural gas commodity service for the above address from (NGS) beginning on the date set by your Natural Gas Distribution Company (NGDC) and will continue for (XX) months (or billing cycles).

Month-to-Month Agreement — You will buy your natural gas commodity service for the above street address from (NGS) beginning on the date set by your Natural Gas Distribution Company (NGDC) and will continue on a month to month basis until cancelled by either the customer or (NGS). See Section (X) for how to cancel this agreement.

3. Special Terms and Conditions - *List and explain all that apply.*

Sign-up bonuses

Add-ons

Limited time offers

Other Sales Promotions

Exclusions

4. Special Services - *Provide explanation of price, terms and conditions, if applicable.*

5. Penalties, Fees and Exceptions - *List any that apply, including a late payment charge.*

Penalties/Fees assessed on a customer for early termination of the agreement should be in plain language and easy for the customer to understand. The penalty/fee should be listed as a dollar amount or explained so that the customer can easily determine the amount of the penalty. The print size for this section must be larger than the print in the rest of the agreement.

6. Cancellation Provisions - *This category may consist of both customer initiated cancellation provisions and supplier initiated cancellation provisions.*

7. Agreement Expiration/Change in Terms

If you have a fixed duration contract approaching the expiration date, or whenever we propose to change the terms of service, you will receive two separate written notifications, the first approximately 60 to 75 days in advance and the second 45 days in advance of either the expiration date or the effective date of the proposed changes. These notifications will explain your options going forward.

8. Dispute Procedures

Contact us with any questions concerning our terms of service. See Section (X) for contact information.

9. Contract Assignment

If the contract is assignable, the NGS needs to include a section informing the customer of this possibility. The customer should be informed that contract terms and conditions remain unchanged under an assignment, and that the customer will receive prior notification of any subsequent assignment. If an assignment occurs, the NGS shall provide notice to the affected customer, the affected NGDC and the Commission. The customer notice must include the name of the new NGS, the contact information for the new NGS and language informing the customer that contract terms and conditions remain unchanged. See 52 Pa. Code 62.75(j).

10. Contact Information

Supplier Name:

Address:

Phone Number:

Internet Address:

11. Information about shopping for a Natural Gas Supplier is available from:

Pennsylvania Public Utility Commission (PUC)
400 North Street, Harrisburg PA 17120
1-800-692-7380
www.pagasswitch.com

Pennsylvania Office of Consumer Advocate
www.oca.state.pa.us

Natural Gas Supplier Contract Summary

Natural Gas Supplier Information	<i>Name, telephone number, website, etc. Plain language statement that NGS is responsible for gas commodity/supply charges.</i>
Natural Gas Price Structure	<i>Fixed, variable or other. If variable, based on what? If variable, how often is the price expected to vary? If variable, give any applicable ranges/ceilings. If no ranges/ceilings, a plain language statement indicating this fact. If variable, describe when the customer will receive notification of price changes in relation to time of month, final monthly meter read, billing cycle or when the price takes effect.</i>
Natural Gas Supply Price	<i>\$/unit or ¢/unit. If variable price, the first billing cycle's rate. Full disclosure of any introductory rate. If a monthly fee, disclose the amount and that it is in addition to the usage charges.</i>
Statement Regarding Savings	<i>Plain language that the supply price may not always provide savings to the customer.</i>
Deposit Requirements	<i>Any deposit requirements necessary for a customer and any terms associated with that deposit, in plain language.</i>
Incentives	<i>Any bonuses, discounts, cashback, offers, etc. and any associated terms, criteria and conditions, in plain language.</i>
Contract Start Date	<i>Plain language regarding the approximate start of NGS service.</i>
Contract Duration/Length	<i>In months, billing cycles, etc.</i>
Cancellation/Early Termination Fees	<i>Yes or no. If yes, describe the amount of the fee and how to avoid that fee, if possible.</i>
End of Contract	<i>Treatment of customer at the end of contract in plain language.</i>


EXHIBIT 2A

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**PENNSYLVANIA DEPARTMENT OF STATE
 BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

<input type="checkbox"/> Return document by mail to: Kenneth B Thomson Name _____ 225 Union Boulevard, Ste. 200, Address _____ Lakewood CO 80228 City State Zip Code _____ <input type="checkbox"/> Return document by email to: _____	Registration of Fictitious Name DSCB:54-311 (rev.2/2017)  311
--	--

Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.

Fee: \$70.00 I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of 54 Pa.C.S. § 311 (relating to registration), the undersigned entity(ies) desiring to register a fictitious name under 54 Pa.C.S. Ch. 3 (relating to fictitious names), hereby state(s) that:

1. The fictitious name is:
Kratos Gas & Power

2. A brief statement of the character or nature of the business or other activity to be carried on under or through the fictitious name is:
Sale of natural gas to retail customers

3. The address, including number and street, if any, of the principal place of business (P.O. Box alone is not acceptable):

225 Union Boulevard, Suite 200	Lakewood	CO	80228	Out Of State
Number and street	City	State	Zip	County

4. The name and address, including number and street, if any, of each individual interested in the business is:

Name	Number and Street	City	State	Zip
Matthew Hurley	20405 State Hwy 249 , Suite 850 , Houston , Out Of State , TX , United States , 77070			

5. Each entity, other than an individual, interested in such business is (are):

TW Holdings, LLC	Limited Liability Company	CO
Name	Form of Organization	Organizing Jurisdiction
225 Union Boulevard, Suite 200, Lakewood, Out Of State, CO, United States, 80228		
Principal Office Address		

PA Registered Office, if any

Missouri River Royalty Corporation	Business Corporation	ND
Name	Form of Organization	Organizing Jurisdiction
919 South 7th Street, Suite 405, Bismarck, Out Of State, ND, United States, 58504		
Principal Office Address		

PA Registered Office, if any

Rainbow Gas Company	Business Corporation	ND
Name	Form of Organization	Organizing Jurisdiction
919 South 7th Street, Bismarck, Out Of State, ND, United States, 58504		
Principal Office Address		

PA Registered Office, if any

6. The applicant is familiar with the provisions of 54 Pa.C.S. § 332 (relating to effect of registration) and understands that filing under the Fictitious Names Act does not create any exclusive or other right in the fictitious name.

7. (Optional): The name(s) of the agent(s), if any, any one of whom is authorized to execute amendments to, withdrawals from or cancellation of this registration in behalf of all then existing parties to the registration, is (are):

Kenneth Thomson, General Counsel

IN TESTIMONY WHEREOF, the undersigned has caused this Application for Registration of Fictitious Name to be executed this

12th day of August, 2019.

Matthew Hurley

Individual Signature

TW Holdings, LLC

Entity Name

Thomas Williams

Signature

Manager

Title

Missouri River Royalty Corporation

Entity Name

Ryan Kopseng

Signature

Secretary

Title

Rainbow Gas Company

Entity Name

Rkan Kopseng

Signature

Secretary

Title

EXHIBIT 2B-1

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE

08/06/2019

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

I DO HEREBY CERTIFY THAT,

United Energy Trading, LLC

is duly registered to do business under the laws of the Commonwealth of Pennsylvania and remains a registered Foreign Limited Liability Company so far as the records of this office show, as of the date herein.

I DO FURTHER CERTIFY THAT this Certificate of Registration shall not imply that all fees, taxes and penalties owed to the Commonwealth of Pennsylvania are paid.



IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the Seal of the Secretary's Office to be affixed, the day and year above written

Katlynn Bookman

Acting Secretary of the Commonwealth

Certification Number: TSC190806120906-1

Verify this certificate online at <http://www.corporations.pa.gov/orders/verify>

EXHIBIT 2B-2

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SECRETARY'S BUREAU

State of North Dakota

SECRETARY OF STATE



Certificate of Good Standing of UNITED ENERGY TRADING, LLC

SOS Control ID#: 0000071904

Certificate #: 017024322

The undersigned, as Secretary of State of the state of North Dakota, hereby certifies that, according to the records of this office,

UNITED ENERGY TRADING, LLC

a Limited Liability Company - Business - Domestic was formed under the laws of NORTH DAKOTA and filed with this office effective September 3, 2002. This entity has, as of the date set forth below, complied with all applicable North Dakota laws.

ACCORDINGLY, the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Good Standing.

DATE: August 5, 2019

A handwritten signature in cursive script, reading "Alvin A. Jaeger".

Alvin A. Jaeger
Secretary of State

EXHIBIT 8A-1

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMMISSIONERS:

TIM G. ECHOLS, CHAIRMAN
CHUCK EATON
H. DOUG EVERETT
STAN WISE



FILED

SEP 20 2012

EXECUTIVE SECRETARY
G.P.S.C.

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

REECE McALISTER
EXECUTIVE SECRETARY

Georgia Public Service Commission

(404) 656-4501
(800) 282-5813

244 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334-5701

FAX: (404) 656-2341
www.psc.state.ga.us

DOCKET# 35857
DOCUMENT# 144125

DOCKET NO. 35857

IN RE: UNITED ENERGY TRADING, LLC'S APPLICATION FOR A NATURAL GAS MARKETER CERTIFICATE OF AUTHORITY

INTERIM CERTIFICATE ORDER

Interim Certificate No.: GM-39
Date Issued: September 4, 2012

APPEARANCES

FOR UNTITED ENERGY TRADING, LLC:

Peter Floyd, Attorney
Kenneth Thomson, General Counsel

FOR THE COMMISSION STAFF:

Nancy Gibson, Attorney

I. STATEMENT OF PROCEEDINGS

A. Summary and Jurisdiction

This matter came before the Georgia Public Service Commission ("GPSC" or "Commission") on the application of United Energy Trading, LLC ("Applicant," "United Energy", or "UET"), d/b/a Kratos Gas & Power pursuant to the Natural Gas Competition and Deregulation Act ("Act"), particularly O.C.G.A. Section 46-4-153, and the Commission's Rules, Chapter 515-7-3 for a certificate of authority to market and provide natural gas commodity sales

service to retail customers who receive firm service. Each Interim Certificate is specific to the delivery pool group(s) on the Atlanta Gas Light Company (“AGLC”) distribution system for which the Applicant receives authority to serve.

The Act provides that a certificate of authority is necessary prior to providing or offering to provide natural gas service to firm retail customers in Georgia. O.C.G.A. § 46-4-153(a)(1). In order to be certificated, an applicant must demonstrate to the Commission that it meets the criteria set forth in the Act. Those criteria include that the applicant “(p)ossesses satisfactory financial and technical capability to render the certificated service;” (O.C.G.A. § 46-4-153(a)(2)(A)) “(h)as a sufficient gas supply to meet the requirements of such service;” (O.C.G.A. § 46-4-153(a)(2)(B)) and “(w)ill offer such service pursuant to rules and contract terms which the commission finds economically viable for the territory which the marketer proposes to serve.” (O.C.G.A. § 46-4-153(a)(2)(C)).

The Act requires that the Commission conduct a hearing within sixty (60) days of the filing of the application and that the Commission issue an Order within ninety (90) days of the application. O.C.G.A. § 46-4-153(c)(5). The Commission conducted the docket pursuant to its July 17, 2012 Procedural and Scheduling Order, which complied with the statutory deadlines.

B. Issues and Proceedings

United Energy Trading filed its application on May 8, 2012. On May 23, 2012, pursuant to Commission Rule 515-7-3-.03(6), the Staff sent a letter of incompleteness to inform UET that its application was incomplete. On June 4, 2012, UET filed supplemental information and the application was deemed complete on June 19, 2012. On June 26, 2012, the Staff sent its first set of data requests to UET and the Applicant responded to data requests on July 5, 2012.

Pursuant to the Procedural and Scheduling Order, the Commission received pre-filed testimony from UET on July 27, 2012 and a hearing on the application was held on August 7, 2012. The Applicant sponsored the witness panel of Mike Huggins and Phil Harrod. The Applicant also submitted into evidence exhibits including a copy of the application for certification.

Under the provisions of O.C.G.A. Section 46-4-153(a)(2), the Commission has the authority to certify applicants that demonstrate satisfactory financial and technical capability, sufficient gas supply, and offer such certificated service pursuant to rules and contract terms which the Commission finds economically viable for the territory which the applicant proposes to serve.

II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

United Energy Trading, d/b/a Kratos Gas & Power is a wholly owned subsidiary of United Energy Corporation (“UEC”). UET, a North Dakota limited liability partnership seeks to market and sell natural gas to commercial and residential customers in Georgia. UET proposes to serve all nine primary delivery pool groups on the AGLC system within the State of Georgia.

A. Technical Capability

The Commission reviewed UET's application pursuant to the standards of Commission Rule 515-7-3-.04 in order to determine technical capability to render service. Technical capability applies not only to natural gas operations but also to a marketer's ability to perform other functions necessary for providing customers with reliable service. These other functions include, but are not limited to, billing and customer service. UET presented evidence of its capability to provide all of these functions.

On other operational issues, witness Mike Huggins, the Managing Director for UET testified that the Applicant's management team in Georgia alone has about 50 years of collective experience in all facets of supplying, purchasing, transporting, nominating, and scheduling natural gas for delivery. This includes years of collective experience in forecasting customer usage throughout the United States and Canada. (pre-filed testimony pp. 11-12). In addition, UET provided information during the application process that its personnel are trained and experienced in managing, natural gas supply, transportation and natural gas storage.

At the hearing, no other party offered any evidence in opposition to the Applicants' testimony or documentary submissions. Through the testimony of its witnesses, as well as its exhibits, and responses to Staff's Data Requests, UET demonstrated the technical capability to perform the following:

- (a) obtain sufficient natural gas supply to meet the requirements of its proposed service;
- (b) forecast required firm load capacity to meet required load demand;
- (c) provide back-up natural gas supplies in the event of a disruption in natural gas supply;
- and
- (d) provide ancillary services to firm customers, including but not limited to billing, billing inquiries, payment processing, customer service inquiries and telephone support.

The Applicant demonstrated its technical and managerial expertise in the natural gas industry. Based on the evidence presented, the Commission finds and concludes that UET satisfies the requirements of technical capability to provide firm natural gas commodity sales service.

B. Financial Capability

The Applicant demonstrated that it is financially capable to meet the requirements to provide natural gas service in the State of Georgia. Applicant presented financial documentation, which shows that UET's available capital is greater than its expected liabilities. The Applicant has shown that it has the ability to meet the creditworthiness standards of the interstate pipelines serving the State of Georgia and the Commission-approved creditworthiness standards of AGLC. The Applicant has also shown that it will offer service pursuant to rules and contract terms that are economically viable for the delivery groups that the Applicant proposes to serve.

UET stated in its application and/or pre-filed testimony that it is using a combination of cash on hand, a credit facility, and a parental guaranty. As a condition of this certificate of authority, should UEC for any reason provide notice to UET that the parental guarantee is being terminated and/or if UET's bank provides UET notice that its credit facility is being terminated, then UET shall give the Commission written notice of such termination within ten days of its receipt and UET shall further provide to the Commission, at such time, documentary proof that it has the financial capability to continue to meet its obligations as a natural gas marketer in the State of Georgia. UET must maintain at least One Million Dollars (U.S. \$1,000,000.00) in unencumbered capital at all times. In the event that UET's unencumbered capital is less than one million dollars (U.S. \$1,000,000.00) at any time, United Energy Corporation, its parent, shall immediately inject sufficient capital so that UET will have the minimum level of capitalization.

No party offered any evidence to dispute UET's testimony or documentary submissions. Based on the evidence submitted, the Commission finds and concludes that UET satisfies the financial capability standards required by this Georgia law and Commission rules.

During the hearing, Mr. Higgins agreed that UET would provide quarterly financial reporting as required by Commission Rules (tr. Page 41). Furthermore, Mr. Harrod stated during the hearing that any losses incurred by UET in Georgia would be mitigated by the UEC credit facility in support of its operations in the Georgia market and UEC would provide financial support for UET to prevent bankruptcy (tr. Page 42).

III. GENERAL CONDITIONS FOR NATURAL GAS CERTIFICATE APPLICANTS

The Commission is cognizant of the General Assembly's intent to promote competition while protecting the consumer during and after the transition to a competitive natural gas market, to maintain and encourage safe and reliable natural gas service, to deregulate those components of the industry subject to actual competition while continuing to regulate those services subject to monopoly power, and to promote an orderly and expeditious transition of the industry toward competition. O.C.G.A. Section 46-4-151(a). The Commission affirms that certain conditions should be imposed upon all the new certificates of authority in order to attain these legislative goals. Applicants must apply to the Commission prior to any change in ownership, name change (including doing-business-as [d/b/a] name change), adding or dropping a primary delivery pool group from service, owning meters or any other substantial change that would affect their certification, Commission Rule 515-7-3-.04 (10).

In addition, any marketer that is found to have engaged in "cramming" or to have switched a customer's service or to have changed the features of a customer's service without that customer's authorization shall be subject to Commission sanctions including, without limitation, the revocation of its certificate. All applicants for a natural gas certificate are required to pass through discounts to senior citizens who are eligible for the AGLC senior citizen discount program, to the extent that AGLC provides the underlying discounts to the marketers.

Applicants are required to maintain on file with the Commission current and accurate copies of their sample bills and terms and conditions in accordance with any applicable

Commission rules. Applicants shall be required to fulfill any outstanding request for information from the Staff that may not have been provided as of the date of issuance of the interim certificate, and to provide any other information that may be required by the Commission.

All applicants shall comply with all applicable laws, rules and regulations. For example, all contracts must allow a firm customer to cancel their contract without penalty within seventy-two (72) hours after the customer has signed, and must allow cancellation without penalty if the customer moves outside the primary delivery pool group (see Commission Rules 515-7-3-.03(2)(f)(i)[d](1) and (2), passed pursuant to the authority of O.C.G.A. Section 46-4-160(a)(2)). Marketers with interim certificates may not avoid their obligations under their certificate conditions, applicable laws, rules and regulations, by contracting with intermediary agents whose practices would result in violations of these obligations, or by contracting in any manner that results in customers not receiving the full protection of these obligations. UET shall be required to make available contemporaneously to customers who are randomly assigned to it the same options for rates, terms and conditions of service that UET makes available to its other similarly situated customers. The Commission may revoke a certificate for good cause under the Act, including without limitation, a finding that activities of the marketer are serving or could serve to mislead, deceive or work a fraud upon members of the public under O.C.G.A. Section 46-4-153(e). All applicants must abide by statutory and Commission rules provisions relating to the Universal Service Fund.

IV. ORDERING PARAGRAPHS

The Commission decides, based upon its evaluations and determinations as set forth in the preceding Findings of Fact and Conclusions of Law, and upon the evidence of record, that it is appropriate to certify the Applicant with certain conditions being set upon the certificate.

* * * * *

WHEREFORE, IT IS ORDERED, that Interim Certificate No. GM-39 is granted to United Energy Trading, LLC, 225 Union Boulevard, Suite 200, Lakewood, Colorado 80028 to provide firm natural gas commodity sales services in Georgia in the primary delivery pool groups specified below. The certificate of authority shall be issued on an interim basis as a condition of this certificate. UET shall comply with all terms of the Commission's Order in this matter, thereby enabling the Commission and Staff to determine if a permanent certificate of authority is appropriate under the statutes, rules, orders and guidelines of the State of Georgia and the Commission. It is determined that permanent status will be considered only for the delivery pool groups for which UET has demonstrated adequate operations to the Commission and Staff.

ORDERED FURTHER, that United Energy Trading, LLC is hereby granted an Interim Certificate of authority to provide firm natural gas services in all of the AGLC Georgia primary delivery pool groups, to wit: Atlanta, Ex-Atlanta Southern, Ex-Atlanta Transco, Macon, Augusta, Brunswick, Rome, Valdosta, and Savannah.

ORDERED FURTHER, that if UET seeks to add or drop a primary delivery pool group from service, it must submit an application for an amendment to its current Interim Certificate to provide services to additional or fewer primary delivery pool groups.

ORDERED FURTHER, that as a condition of this Interim Certificate of authority, the parental guaranty shall remain in place until UET provides documentation to the Commission proving and the Commission determining that UET has sufficient capital to stand on its own.

ORDERED FURTHER, that as a condition of this Interim Certificate of authority, should UET Corporation for any reason provide notice to UET that the parental guarantee is being terminated and/or if UET's bank provide UET notice that its credit facility is being terminated, UET shall give the Commission written notice of such termination within ten days of its receipt and UET shall further provide to the Commission, at such time, documentary proof that it has the financial capability to meet its obligations as a natural gas marketer in the State of Georgia.

ORDERED FURTHER, UET must maintain at least one million dollars (U.S. \$1,000,000.00) in unencumbered capital at all times. In the event that UET's unencumbered capital is less than one million dollars (U.S. \$1,000,000.00) at any time, United Energy Corporation, its parent shall immediately inject sufficient capital so that UET will have the minimum level of capitalization

ORDERED FURTHER, that UET must maintain a current listing for a registered office and a registered agent in Georgia on file with this Commission, as well as a current registration with the Georgia Secretary of State's Office to do business in Georgia.

ORDERED FURTHER, that if UET does not transact any business as a marketer of firm natural gas services in one or more primary delivery pool groups for more than twelve (12) months, it shall file an application to amend or terminate its current certificate accordingly with respect to such un-served primary delivery pool group(s).

ORDERED FURTHER, that if UET ceases to do business in Georgia under any name(s) appearing on this interim certificate, it shall submit an application for an amendment to its certificate stating the name or names which UET no longer plans to use.

ORDERED FURTHER, that if UET desires to change ownership or do business in Georgia under any name which does not appear on this interim certificate, or proposes any other substantial change that would affect its certification, it shall submit an application for an amendment to its certificate describing the change or stating the name(s) under which it plans to conduct business.

ORDERED FURTHER, that during the interim period of this certificate, UET must keep current and accurate copies of its sample bills and terms and conditions, for all firm customers, including residential, on file with the Commission. Sample bills and terms and conditions shall be filed with the Commission within thirty (30) days of any changes being made to the same. To the extent that said information is trade secret, filings may be made pursuant to the Commission's Trade Secret Rule 515-3-1-.11.

ORDERED FURTHER, that the Interim Certificate herein approved is issued subject to the standards and requirements adopted by the Commission in Docket No. 15326 and that UET shall abide by the provisions relating to the Universal Service Fund in that docket and Commission Rule 515-7-5, all Federal laws and all applicable laws under the Official Code of Georgia Annotated, all applicable rules and regulations of the Commission and provisions of pertinent Commission orders currently in effect or which may be promulgated from time to time.

ORDERED FURTHER, that during the period of the Interim Certificate herein UET is subject to the standards and requirements adopted in the Commission Rules.

ORDERED FURTHER, that pursuant to O.C.G.A. § 46-4-153, the Interim Certificate granted herein shall be subject to revocation if UET fails to comply with Commission Rules, requirements or orders, or violates any applicable law.

ORDERED FURTHER, that if the Commission determines that marketers may own meters, and UET wishes to own meters, UET shall submit an application for an amendment to this certificate showing its technical capability to install, remove and safely operate and maintain meters. Such application must comply with any Commission rules that may be in effect regarding meter ownership, and shall include but not be limited to the Georgia Department of Transportation's certificate for meter ownership.

ORDERED FURTHER, that to the extent AGLC makes available to UET a senior citizen discount program, UET shall be required, as a condition to this Interim Certificate, to pass through all such discounts to its senior citizen customers eligible for such program.

ORDERED FURTHER, that UET may not avoid its obligations under this interim certificate, applicable laws, rules or regulations, by contracting with intermediary agents whose practices would result in violations if undertaken by UET, or by contracting in any manner that results in customers not receiving the full protection of these obligations.

ORDERED FURTHER, that any marketer found to have switched a customer's service or to have changed the features of a customer's service without that customer's authorization shall be subject to Commission sanctions including, without limitation, the revocation of its certificate.

ORDERED FURTHER, that UET shall be required to make available contemporaneously to customers randomly assigned to it the same options for rates, terms and conditions of service that it makes available to its other similarly situated customers.

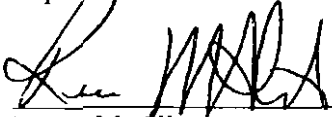
ORDERED FURTHER, that UET shall fulfill any outstanding request for information from the Staff within thirty (30) days of the order, and shall provide any other information that may be required by the Commission.

ORDERED FURTHER, that all findings, conclusions and determinations stated in the preceding sections of this Order are adopted as findings of fact, conclusions of law, and determinations of regulatory policy of this Commission.


ORDERED FURTHER, that any motion for reconsideration, rehearing or oral argument, or any other motion, shall not stay the effectiveness of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order or Orders as the Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 4th day of September 2012.



Reece McAlister
Executive Secretary



Tim G. Echols
Chairman

9-18-12

Date

9-20-12

Date

CERTIFICATE OF SERVICE

DOCKET NO. 35857

**IN RE: APPLICATION OF UNITED ENERGY TRADING, LLC d/b/a KRATOS
GAS & POWER FOR NATURAL GAS MARKETER CERTIFICATE OF
AUTHORITY**

I, the undersigned, do herewith certify that I have caused to be served the required copies of the enclosed Interim Certificate Order. All parties are being provided an electronic copy.

Kenneth Thomson, General Counsel
United Energy, LLC
225 Union Boulevard
Suite 200
Lakewood, Colorado 80028

Peter K. Floyd, Partner
Alston & Bird LLP
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

Respectfully submitted, this 25th day of
September, 2012



Janice Sears
Administrative Assistant

EXHIBIT 8A-2

RECEIVED

SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of United Energy) Application No. NG-0085
Trading LLC, d/b/a Kratos Gas &)
Power, Lakewood, Colorado, seek-)
ing a certificate of authority) AUTHORITY GRANTED
to operate as a Competitive)
Natural Gas Provider in the)
State of Nebraska.) Entered: December 8, 2015

BY THE COMMISSION:

By application filed on September 28, 2015, United Energy Trading LLC, d/b/a Kratos Gas & Power (Kratos), Lakewood, Colorado, seeks authority to operate as a competitive natural gas provider (CNGP) in the State of Nebraska. Notice of the application was published in the *Daily Record*, Omaha, Nebraska, on October 1, 2015.

The deadline for filing a protest or petition for intervention was November 2, 2015. Because no protests or petitions for intervention are pending, the Commission may process this application by modified procedure, pursuant to the Commission Rules of Procedure, 291 Neb. Admin. Code, Ch. 1, Rule 018.03.

O P I N I O N A N D F I N D I N G S

The Commission finds that it has jurisdiction pursuant to Neb. Rev. Stat. §§ 66-1848 to 66-1849. Section 66-1849 provides in part:

The commission shall certify all competitive natural gas providers and aggregators providing natural gas services. In an application for certification, a competitive natural gas provider or aggregator shall reasonably demonstrate managerial, technical, and financial capability sufficient to obtain and deliver the services such provider or aggregator proposes to offer. The commission may establish reasonable conditions or restrictions on the certificate at the time of issuance.

In addition, Commission rules and regulations specify requirements for an application for authority as a CNGP. See, 291 Neb. Admin. Code, Ch. 9, Rule 011.

Kratos is a North Dakota limited liability company with its principal office in Lakewood, Colorado. Kratos is a wholly

owned subsidiary of United Energy Corporation (Parent). In support of its application, Kratos filed the audited consolidated financials of Parent. Kratos also provided a copy of its Certificate of Authority to Transact Business in Nebraska. No legal actions or formal complaints pertaining to the provision of competitive natural gas services were pending against Kratos within the twelve months prior to filing this application, nor has Kratos had a license or certificate to supply competitive natural gas service revoked, denied or withdrawn.

In addition, Kratos submitted a roster of its management team, with information regarding years of experience and operational functions. Kratos also provided an affidavit of one of the officers, attesting to the accuracy of the information included in the application.

Commission Staff Accountant Steve Stovall submitted a Report on Regulatory Compliance indicating that the financial statements submitted provide evidence of adequate financial resources necessary to obtain and deliver the services that Kratos proposes to offer.

Based upon the information provided in the application and verified by affidavit, the Commission finds that the provisions of Neb. Rev. Stat. §§ 66-1348, 66-1349 and applicable Commission rules and regulations are met. Kratos's application for authority should be granted, and Kratos should be issued a certificate of authority to operate as a competitive natural gas provider in Nebraska consistent with the conditions set forth in this order.

O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that Application No. NG-0085 be, and it is hereby, granted and United Energy Trading LLC, d/b/a Kratos Gas & Power, is authorized to operate as a competitive natural gas provider within the State of Nebraska.

IT IS FURTHER ORDERED that this order be, and it is hereby made the Commission's official certificate of authority to furnish the service authorized herein as competitive natural gas provider.

ENTERED AND MADE EFFECTIVE at Lincoln, Nebraska, this 8th day of December, 2015.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Tim Schram
Crystal Knodes
Deborah Johnson

Chairman

Harold F. V. Jr.

ATTEST:

Sally L. P. Kelly

Executive Director

EXHIBIT 8A-3

RECEIVED

SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
UNITED ENERGY TRADING, LLC, d/b/a KRATOS)
GAS & POWER, for a license as an alternative gas) Case No. U-17526
supplier.)
_____)

At the April 15, 2014 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. John D. Quackenbush, Chairman
Hon. Greg R. White, Commissioner
Hon. Sally A. Talberg, Commissioner

ORDER GRANTING LICENSE

On January 17, 2014, United Energy Trading, LLC, d/b/a Kratos Gas & Power (Kratos), applied for a license to operate as an alternative gas supplier (AGS) within Michigan pursuant to 2002 PA 634, MCL 460.9 *et seq.* (Act 634). As part of its application, Kratos provided information to demonstrate compliance with the AGS license requirements under Act 634 and under the Commission's March 12, 2003 order in Case No. U-13694 (March 12 order). That order established the AGS licensing procedure.

Act 634 requires an AGS to have the necessary financial, managerial, and technical capabilities to serve customers within the state of Michigan. The act also requires an AGS to maintain an office within the state. Under the March 12 order, the Commission Staff (Staff) must review the application of the AGS for conformance with the act and with the Commission's orders. The Staff then must recommend appropriate action regarding that application to the

Commission. The Staff has reviewed Kratos' license application and the information submitted and recommends that the company be granted a license to operate as an AGS in Michigan.

The application shows that Kratos is a privately held wholly-owned limited liability company and has its headquarters at 225 Union Blvd., Suite 200, Lakewood, Colorado. Kratos was organized in North Dakota on September 3, 2002 and was registered with the Michigan Corporations Division on October 23, 2012, ID Number D92107.

According to the application, Kratos is licensed to market and serve natural gas to retail residential and commercial customers in Georgia, Ohio, and California. It currently serves approximately 93,000 retail customers throughout these jurisdictions.

The Staff reviewed Kratos' personnel descriptions and histories and observes that their key personnel have over 100 combined years of experience in the energy industry from managing and overseeing operations to marketing, sales, and customer service. Kratos will respond to customer inquiries and complaints during regular business hours in a timely manner through its current customer call center. The Staff has determined that Kratos is well qualified with sufficient experience and expertise to serve customers in Michigan's Gas Customer Choice Program.

Based upon the information provided by Kratos and the recommendation of the Staff, the Commission finds that Kratos possesses the appropriate managerial and technical capabilities to serve customers within the state of Michigan.

Kratos has provided the Staff with a letter of credit in the amount of \$100,000. Based on its review of the confidential financial documents and the satisfied letter of credit requirement, the Staff determined that Kratos' financial capabilities and availability meet Act 634 requirements. The Commission agrees.

Act 634 requires Kratos to maintain an office within the state of Michigan. Kratos' Michigan office is located at 701 Stickel Road, Gladwin, Michigan 48624. The Staff determined that Kratos has met the office requirements for licensing. The Commission agrees.

Based upon the submissions and all of the information provided, the Commission finds that Kratos's request to be licensed as an AGS is reasonable and in the public interest, and that it should be approved. However, the grant of the license is conditioned upon compliance with all of the applicable provisions of Act 634, the Commission's orders and administrative rules, and each of the delivering natural gas utilities' tariffs. Failure to comply with any of these provisions may result in revocation of the license or other penalties.

THEREFORE, IT IS ORDERED that:

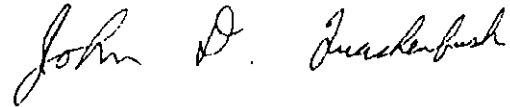
A. United Energy Trading, LLC, d/b/a Kratos Gas & Power, is granted a license as an alternative gas supplier.

B. United Energy Trading, LLC, d/b/a Kratos Gas & Power, shall comply with the regulatory requirements specified in 2002 PA 634, MCL 460.9 *et seq.*; the Commission's orders and administrative rules approved by the Commission; and each of the delivering natural gas utilities' tariffs.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, under MCL 462.26.

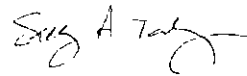
MICHIGAN PUBLIC SERVICE COMMISSION



John D. Quackenbush, Chairman

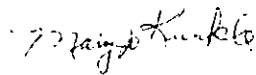


Greg R. White, Commissioner



Sally A. Talberg, Commissioner

By its action of April 15, 2014.



Mary Jo Kunkle, Executive Secretary

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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

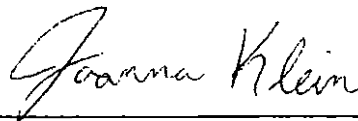
PROOF OF SERVICE

STATE OF MICHIGAN)

Case No. U-17526

County of Ingham)

Joanna Klein being duly sworn, deposes and says that on April 15, 2014 A.D. she served a copy of the attached Commission order by first class mail, postage prepaid, or by inter-departmental mail, to the persons as shown on the attached service list.



Joanna Klein

Subscribed and sworn to before me
This 15th day of April 2014

**Gloria
Pearl Jones**

Digitally signed by Gloria Pearl Jones
DN: cn=Gloria Pearl Jones, o=Michigan
Public Service Commission,
ou=Executive Secretary Division,
email=jonesg1@michigan.gov, c=US
Date: 2014.04.16 15:34:48 -04'00'

Gloria Pearl Jones
Notary Public, Ingham County, MI
My Commission Expires June 5, 2016
Acting in Eaton County

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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Service List U-17526

Kratos Gas and Power
701 Stickel Road
Gladwin MI 48624

United Energy Trading, LLC d/b/a Kratos Gas and
Power
Michael Huggins, Managing Director
225 Union Boulevard, Suite 200
Lakewood CO 80228

EXHIBIT 8A-4

RECEIVED

SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**The Public Utilities Commission of Ohio
Ohio Competitive Retail Natural Gas Marketer Certificate**

Renewal

Issued pursuant to Case Number(s):
11-0027-GA-CRS

is

Ohio Competitive Retail Natural Gas Marketer Certificate Number:
11-208G(5)

Granted to:

United Energy Trading, LLC dba Kratos Gas & Power

Whose office or principal place of business is located at:
225 Union Blvd, Suite 200, Lakewood, CO 80228

And is hereby certified to provide:
Retail Natural Gas Marketer Services
within the state of Ohio, for a two-year period.

Certification Effective:
February 27, 2019 through February 27, 2021

The certification of Ohio competitive retail natural gas marketers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio

Dated: **March 7, 2019**

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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

By Order of
The Public Utilities Commission of Ohio



Tanowa M. Troupe, Acting Secretary
Susan Patterson, Acting Secretary
Beverly Hoskinson, Acting Secretary

EXHIBIT 8E

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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Key Personnel Responsible For Operations

Thomas Williams

President

225 Union Boulevard, Ste. 200

Lakewood, CO 80228

twilliams@uetllc.com

(303) 991-0026

Tom Williams is the President at United Energy Trading. Tom took on scheduling and trading duties at Kinder Morgan where he was responsible for all sales and purchases on the Kansas/Nebraska system. Continuing at Wildhorse Energy Partners, Tom held the role of Director of Marketing and was responsible for all aspects of its gas trading business. Joining Tom Brown, Inc., Tom continued working as the Director of Marketing, responsible for managing Tom Brown's production, transport, storage, and marketing. Before founding United Energy Trading, Tom managed a proprietary book of business based in the Rockies, at first Millennium Gas Marketing, then Tegra Energy Services. As president of UET, Tom is responsible for all aspects of UET's trading and marketing activities including the growth and operations for 10 offices and roughly 70 employees.

Michael Huggins

Managing Director

225 Union Boulevard, Ste. 200

Lakewood, CO 80228

mhuggins@uetllc.com

(720) 897-4746

Mike Huggins is the Managing Director at United Energy Trading. Mike joined UET in March 2009. His main focus is managing UET's Retail Marketing Book. Mike is also part of a group whose focus is wholesale gas marketing in the Rockies West region. Mike graduated from the University of Illinois with a degree in statistics. Mike started his career in 1995 at Western Gas Resources as a Financial Analyst. Two years later, Mike began trading derivatives at Western. He became WGR's lead financial trader shortly thereafter, trading Nymex, Basis, and Options, with a focus on the Rockies. In 2007, Mike was hired by High Sierra Energy as their risk officer. He went on to help create and manage High Sierra's wholesale gas marketing group.

EXHIBIT 12

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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

United Energy Trading LLC
225 Union Blvd., Suite 200
Lakewood CO 80228

REFERENCE: 99089 376606
PUC Notice

STATE OF PENNSYLVANIA)
COUNTY OF ERIE) SS:

Jennifer L. Trott, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, a true and correct copy of which is attached, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 09/04/19

TOTAL COST: \$610.00 AD SPACE: 0 Lines

FILED ON: 09/04/19

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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

*Application of **United Energy Trading, LLC** (d/b/a "**Kratos Gas & Power**") For Approval To Offer, Render, or Furnish Natural Gas Services as a **Supplier, Aggregator, or Marketer/Broker** Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.*

United Energy Trading, LLC d/b/a Kratos Gas & Power will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. **United Energy Trading, LLC d/b/a Kratos Gas & Power** proposes to sell natural gas and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **United Energy Trading, LLC d/b/a Kratos Gas & Power** 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 **United Energy Trading, LLC d/b/a Kratos Gas & Power's** attorney at the address listed below.

By and through Counsel: Matthew J. Lindsay

United Energy Trading, LLC d/b/a Kratos Gas & Power
225 Union Boulevard, Suite 200
Lakewood, Colorado 80233
(303) 634-7410
(303) 991-0988

P-376606

Sworn to and subscribed before me this 4th day of September 2019

Affiant: Jennifer L. Trott

NOTARY: Barbara J. Moore

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Barbara J. Moore, Notary Public
City of Erie, Erie County
My Commission Expires March 23, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES



The Patriot News
LEGAL AFFIDAVIT

AD#: 0009309206

Commonwealth of Pennsylvania,) ss
County of Cumberland)

Victoria Soto being duly sworn, deposes that he/she is principal clerk of PA Media Group; that The Patriot News is a public newspaper published in the city of Mechanicsburg, with general circulation in Cumberland and Dauphin and surrounding counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):
The Patriot News 09/03/2019

Victoria Soto

Principal Clerk of the Publisher

Sworn to and subscribed before me this 4th day of September 2019

Crystal B. Rosensteel

Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Crystal B. Rosensteel, Notary Public
Susquehanna Twp., Dauphin County
My Commission Expires June 27, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

Application of United Energy Trading, LLC (d/b/a "Kratos Gas & Power") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier, Aggregator, or Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.
United Energy Trading, LLC d/b/a Kratos Gas & Power will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. United Energy Trading, LLC d/b/a Kratos Gas & Power proposes to sell natural gas and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of United Energy Trading, LLC d/b/a Kratos Gas & Power 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 United Energy Trading, LLC d/b/a Kratos Gas & Power's attorney at the address listed below.

By and through Counsel:
Matthew J. Lindsay
United Energy Trading, LLC d/b/a
Kratos Gas & Power
225 Union Boulevard, Suite 200
Lakewood, Colorado 80233
(303) 634-7410
(303) 991-0988

RECEIVED
SEP 26 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:

September 3, 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.

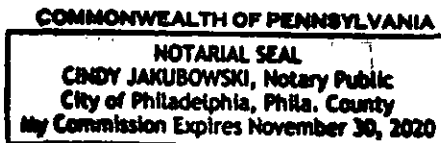


Sworn to and subscribed before me this 3rd day of
September, 2019.



Cindy Jakubowski
Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE
Application of **United Energy Trading, LLC** (d/b/a "Kratos Gas & Power") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier, Aggregator, or Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services, To The Public in The Commonwealth Of Pennsylvania.
United Energy Trading, LLC d/b/a Kratos Gas & Power will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services.
United Energy Trading, LLC d/b/a Kratos Gas & Power proposes to sell natural gas and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **United Energy Trading, LLC d/b/a Kratos Gas & Power** 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 **United Energy Trading, LLC d/b/a Kratos Gas & Power's** attorney at the address listed below.
By and through Counsel: **Matthew J. Lindsay**
United Energy Trading, LLC d/b/a Kratos Gas & Power
225 Union Boulevard, Suite 200
Lakewood, Colorado 80233
(303) 634-7410
(303) 991-0668

RECEIVED

SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss D. Rullo, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the _____ regular _____ editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

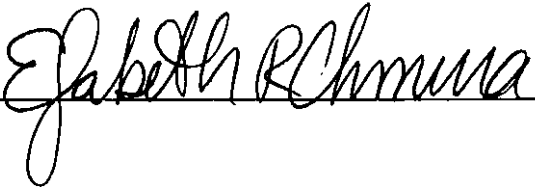
04 of September, 2019

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.



PG Publishing Company

Sworn to and subscribed before me this day of:
September 04, 2019



Elizabeth R. Chmura

Commonwealth of Pennsylvania - Notary Seal
Elizabeth R. Chmura, Notary Public
Allegheny County
My commission expires February 8, 2022
Commission number 1326781
Member, Pennsylvania Association of Notaries

STATEMENT OF ADVERTISING COSTS

United Energy Trading, LLC
225 Union Boulevard, Suite 200
Denver Colorado 80228

To PG Publishing Company

Total ----- \$449.50

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office
2201 Sweeney Drive
CLINTON, PA 15026
Phone 412-263-1338

PG Publishing Company, a Corporation, Publisher of
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By  Samuel J. Arbuthnot

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

COPY OF NOTICE OR PUBLICATION

PENNSYLVANIA
PUBLIC UTILITY
COMMISSION
NOTICE
Application of United Energy Trading, LLC (d/b/a "Kratos Gas & Power") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier, Aggregator or Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services. To The Public In The Commonwealth Of Pennsylvania.
United Energy Trading, LLC d/b/a Kratos Gas & Power will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. United Energy Trading, LLC d/b/a Kratos Gas & Power proposes to sell natural gas and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of United Energy Trading, LLC d/b/a Kratos Gas & Power 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 United Energy Trading, LLC d/b/a Kratos Gas & Power's attorney at the address listed below.
By and through Counsel:
Matthew J. Lindsay
United Energy Trading, LLC
d/b/a Kratos Gas & Power
225 Union Boulevard,
Suite 200
Lakewood, Colorado 80233
(303) 634-7413
(303) 991-0988

The Scranton Times (Under act P.L. 877 No 160. July 9, 1976)
Commonwealth of Pennsylvania, County of Lackawanna

UNITED ENERGY TRADING, LLC
MATTHEW LINDSAY
SUITE 200 225 UNION BOULEVARD
LAKEWOOD CO 80228

Account # 635455
Order # 82371955
Ad Price: 359.90

PENNSYLVANIA PUBLIC UTILI

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:

09/04/2019

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 of publication are true *Ann Marie Fortese*

Sworn and subscribed to before me
this 23rd day of September A.D., 2019

Sharon Venturi

(Notary Public)

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

RECEIVED

SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**
Application of United Energy Trading, LLC (d/b/a "Kratos Gas & Power") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier, Aggregator, or Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.
United Energy Trading, LLC d/b/a Kratos Gas & Power will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. **United Energy Trading, LLC d/b/a Kratos Gas & Power** proposes to sell natural gas and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.
The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **United Energy Trading, LLC d/b/a Kratos Gas & Power** 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 **United Energy Trading, LLC d/b/a Kratos Gas & Power's** attorney at the address listed below.
By and through Counsel: Matthew J. Lindsay
United Energy Trading, LLC d/b/a Kratos Gas & Power
225 Union Boulevard, Suite 200
Lakewood, Colorado 80233
(303) 634-7410
(303) 991-0988

**PROOF OF PUBLICATON OF NOTICE IN THE WILLIAMSPORT
SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929**

STATE OF PENNSYLVANIA

COUNTY OF LYCOMING

SS:

Robert O. Rolley, Jr., Publisher of the Sun-Gazette LLC publishers of the Williamsport Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

September 6, 2019

Affiant further deposes that he is an officer daily authorized by the Sun-Gazette LLC, publisher of the Williamsport Sun-Gazette, to verify the foregoing statement under oath and declare that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all the allegations in the foregoing statement as to time, place and character of publication are true.

**PENNSYLVANIA
PUBLIC UTILITY
COMMISSION
NOTICE**

Application of United Energy Trading, LLC(d/b/a "Kratos Gas & Power") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier, Aggregator, or Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services, To The Public in The Commonwealth Of Pennsylvania.

United Energy Trading, LLC d/b/a Kratos Gas & Power will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. United Energy Trading, LLC d/b/a Kratos Gas & Power proposes to sell natural gas and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of United Energy Trading, LLC d/b/a Kratos Gas & Power 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 United Energy Trading, LLC d/b/a Kratos Gas & Power's attorney at the address listed below.

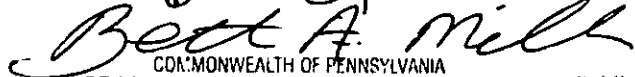
By and through Counsel:
Matthew J. Lindsay
United Energy Trading,
LLC d/b/a Kratos Gas &
Power
225 Union Boulevard,
Suite 200
Lakewood, Colorado
80233
(303) 634-7410
(303) 991-0988



SUN-GAZETTE LLC

Sworn to and subscribed before me

The 6th day of September 20 19


BETH A. MILLER
COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
BETH A MILLER
Notary Public
CITY OF WILLIAMSPORT, LYCOMING COUNTY
My Commission Expires Apr 18, 2020

Notary Public

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:

For publishing the notice attached

Hereto on the above state dates.....\$ 267.08

Probated same.....\$

Total.....\$ 267.08

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE SUN-GAZETTE LLC hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid

SUN-GAZETTE LLC

BY Robert O. Rolley, Jr.

RECEIVED

SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMMONWEALTH OF PENNSYLVANIA }
County of Cambria } SS

**PENNSYLVANIA
 PUBLIC UTILITY COMMISSION
 NOTICE**

Application of United Energy Trading, LLC (d/b/a "Kratos Gas & Power") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier, Aggregator, or Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **United Energy Trading, LLC d/b/a Kratos Gas & Power** 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 **United Energy Trading, LLC d/b/a Kratos Gas & Power's** attorney at the address listed below.

By and through Counsel: Matthew J. Lindsay
United Energy Trading, LLC d/b/a Kratos Gas & Power
 225 Union Boulevard, Suite 200
 Lakewood, Colorado 80233
 (303) 634-7410 (303) 991-0988

published that the a of The Jo interested character

On this 13th day of September A.D. 2019, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Mary Anne Rizzo., who being duly sworn according to law, deposes and says as Advertising Director of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,

y of Cambria, and Commonwealth of Pennsylvania and matter published in said publication in the regular issues on September 5, 2019; and that the Affiant is not tising and that all of the allegations as to time, place and

Mary Anne Rizzo

STATEMENT OF ADVERTISING COSTS

Signed and sworn to before me on
 13th day of September, 2019.
 by Mary Anne Rizzo making the statement.

Vivian Ohs

0.00 Lines @ \$2.50 per line	0.00
6.5 Inches @ \$25.00 per inch	162.50
Notary Fee	5.00
Clerical Fee	2.50
Total Cost	170.00

Commonwealth of Pennsylvania - Notary Seal
 Vivian Ohs, Notary Public
 Cambria County
 My commission expires December 6, 2020
 Commission number 1123017
 Member, Pennsylvania Association of Notaries

To The Tribune-Democrat, Johnstown, PA
 For publishing the notice or publication
 attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

_____ for publisher of _____
 a newspaper of general circulation, hereby acknowledges receipt of the aforesaid
 and publication costs and certifies that the same has been duly paid.

 (Name of Newspaper)

By _____

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PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

Appendix C

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

CERTIFICATE OF SERVICE TEMPLATE

On this the 27th 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:

<p>Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120</p>	<p>Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120</p>
<p>Office of the Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101</p>	<p>Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946</p>
<p>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</p>	<p>Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120</p>
<p>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</p>	<p>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</p>
<p>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</p>	<p>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</p>
<p>Peoples Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212</p>	<p>Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue</p>

PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com	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. 12 th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com



Thomas Williams
 President, United Energy Trading, LLC

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 PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

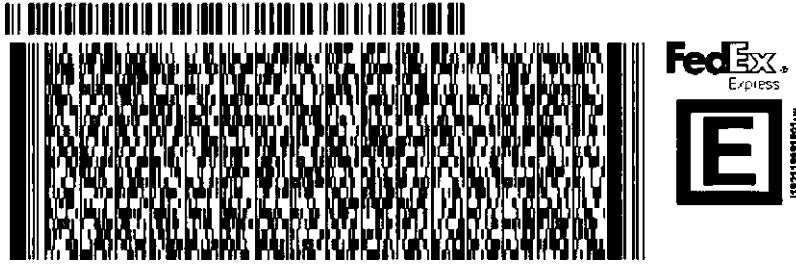
ORIGIN ID:BJCA (303) 634-7410
MATTHEW LINDSAY
UNITED ENERGY TRADING, LLC
225 UNION BLVD
SUITE 200
LAKEWOOD, CO 80228
UNITED STATES US

SHIP DATE: 26SEP19
ACTWGT: 2.00 LB
CAD: 100850274/INET4160
BILL SENDER

TO **SECRETARY**
PENNSYLVANIA PUBLIC UTILITY COMM.
400 NORTH STREET
KEYSTONE BUILDING
HARRISBURG PA 17120

(504) 247-7675 REF CHESAPEAKE
INV DEPT
PO

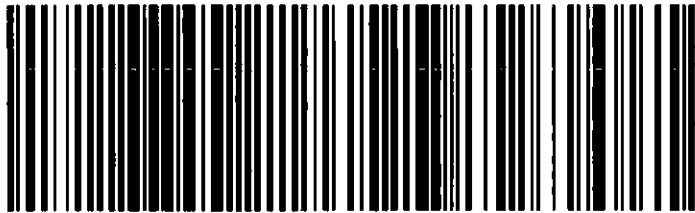
567J16D0405A2



FRI - 27 SEP 10:30A
PRIORITY OVERNIGHT

TRK# 7763 4776 7396
0201

XH MDTA 17120
PA-US MDT



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SEP 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.