



Vanguard Energy Services, L.L.C.
850 East Diehl Road
Suite 142
Naperville, IL 60563

Phone: 630 955-1500
Fax: 630 955-0989
www.vanguardenergy.net

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OCT 17 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

October 17, 2019

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

RE: Vanguard Energy Services, LLC application for Pennsylvania natural gas broker/marketer

Dear Secretary;

Enclosed are the following packets of information for our Pennsylvania natural gas broker/marketer application.

Envelope: Public

This represents the original signed version of the application and public attachments for Vanguard Energy Services, LLC. It also contains a Cashier's check in the amount of \$350.00 payable to Commonwealth of PA.

Envelope: Confidential

This represents the proprietary attachments of the filing for Vanguard Energy Services, LLC. Also included is CD containing a searchable PDF version of the entire application.

Please direct all questions concerning this filing to Neil Anderson at 630.955.1500 x114.

Sincerely,



Neil Anderson
Vice President

enc.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Vanguard Energy Services, LLC, for approval to offer, render, furnish, or supply natural gas supply services as a Broker/Marketer to the public in the Commonwealth of Pennsylvania (Pennsylvania).

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To the Pennsylvania Public Utility Commission:

PA PUBLIC UTILITY COMMISSION
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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:

Vanguard Energy Services, LLC
 850 E Diehl Rd, Suite 142
 Naperville, IL 60563
 Website: www.vanguardenergy.net
 Phone: 630.955.1500

- 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.

Paracorp Incorporated
 600 North Second Street
 Harrisburg, PA 17101
 Dauphin County Phone: 800.533.7272 Fax: 800.603.5868 paracorp@myparacorp.com

- 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.

Neil Anderson, Vice President
 850 E Diehl Rd, Suite 142
 Naperville, IL 60563
 Phone: 630.955.1500 x114
 Fax: 630.955.0989 email: nanderson@vanguardenergy.net

- 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.

Applicant is not using an attorney.

- 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.

Alejandra Caballero, Customer Service
 850 E Diehl Rd, Suite 142
 Naperville, IL 60563
 P: 630.955.1500 x120
 F: 630.955.0989
 email: acaballero@vanguardenergy.net

Neil Anderson, Vice President
 850 E Diehl Rd, Suite 142
 Naperville, IL 60563
 P: 630.955.1500 x114
 F: 630.955.0989
 email: nanderson@vanguardenergy.net

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2. **BUSINESS ENTITY FILINGS AND REGISTRATION**^{PA} PUBLIC UTILITY COMMISSION
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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.

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.

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- 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.
See exhibit A
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
CONFIDENTIAL: See exhibit B
- Give name and address of officers.
Neil Anderson, Vice President, 850 E Diehl Rd, Suite 142, Naperville, IL 60563
Paul Bougadis, Vice President, 850 E Diehl Rd, Suite 142, Naperville, IL 60563
Scott Pellock, Vice President, 850 E Diehl Rd, Suite 142, Naperville, IL 60563
John Weir, Vice President, 850 E Diehl Rd, Suite 142, Naperville, IL 60563

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.

Vanguard Power Services, LLC is an affiliate, not a jurisdictional public utility. It is doing business in Illinois. The address is 850 E Diehl Rd, Suite 142, Naperville, IL 60563.

Vanguard Energy Services, LLC 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.

Applicant does not have any predecessors.

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)

Applicant received the license for electric generation supplier as a broker/marketer on August 8, 2019, under application A-2019-3010992.

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.

Vanguard Energy Services, LLC will provide broker natural gas service by working with certified Pennsylvania natural gas providers.

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.

December 1, 2019

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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.

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.

Vanguard Energy Services, LLC, it's affiliate, its predecessor, persons identified in this Application, are not now nor have they been the defendant of a criminal or civil proceeding within the last five (5) years.

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

Not applicable.

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints 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.

Vanguard Energy Services, LLC, it's affiliate, a predecessor, a person identified in this Application, does not have any complaints in Pennsylvania or any other state.

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

Not Applicable.

6. PROOF OF SERVICE

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

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

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.

<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>

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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.

See exhibit J

- b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:

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

- 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.

Applicant is filing as a Broker/Marketer.

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

Applicant will be receiving a commission as compensation for closing deals with certified natural gas suppliers.

- 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.
- Neil Anderson, Vice President
 850 E Diehl Rd, Suite 142
 Naperville, IL 60563
 P: 630.955.1500 x114
 F: 630.955.0989
 email: nanderson@vanguardenergy.net

- 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.

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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.
 Applicant has been a physical supplier/marketer or broker of natural gas for over 10 years.
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
 See exhibit E for Illinois and exhibit F for Ohio.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
 CONFIDENTIAL: See exhibit G
- Staffing structure and numbers as well as employee training commitments.
 CONFIDENTIAL: See exhibit H
- Business plans for operations within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

- 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.
Applicant currently has in place internal training for onboarding members of our sales channel. Applicant's management team continually attend meetings to both existing clients and prospects alongside sales associates.

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.

Neil Anderson, Vice President
Paul Bougadis, Vice President
Scott Pellock, Vice President
John Weir, Vice President

See exhibit I attached for resumes.

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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.

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

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.

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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.

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.

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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.

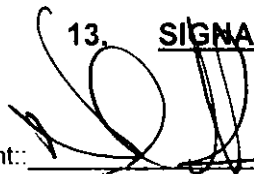
The chart below dictates which newspapers are necessary for each NGDC. For example, an applicant that wants to operate in Peoples – Equitable would need to run ads in both The Erie Times-News and the Pittsburgh Post-Gazette. If the applicant is proposing to serve the entire Commonwealth, please file 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.

	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: Neil Anderson

Title: Vice President

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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: Vanguard Energy Services, LLC

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

Applicant's Use

PUC Secretary's Bureau Use

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Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Illinois :

ss.

County of DuPage :

Neil Anderson, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Vice President (Office of Affiant) of Vanguard Energy Services, LLC (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

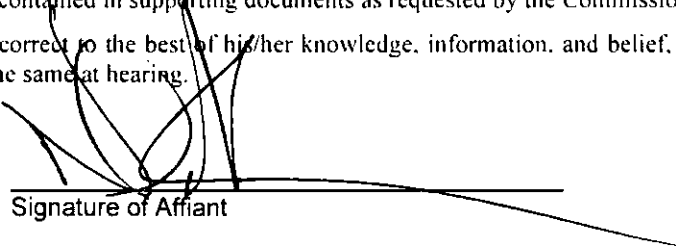
That the Applicant herein Vanguard Energy Services, LLC has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

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

That the Applicant herein Vanguard Energy Services, 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 Vanguard Energy Services, 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 7th day of October, 2019.


Signature of official administering oath

My commission expires Aug. 3, 2021



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Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Illinois :

: ss.

County of DuPage :

Neil Anderson, Affiant, being duly [sworn/affirmed] according to law,
deposes and says that:

[He/she is the Vice President (Office of Affiant) of Vanguard Energy Services, LLC
(Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Vanguard Energy Services, 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 Vanguard Energy Services, 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 Vanguard Energy Service, 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.

OCT 17 2019

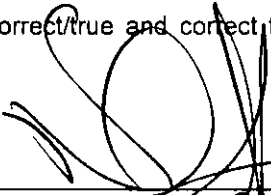
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix B (Continued)

That Vanguard Energy Services, 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.

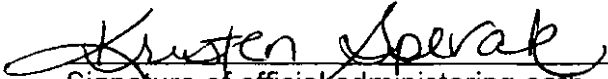
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the 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 7th day of October, 2019.



Signature of official administering oath

My commission expires Aug. 3, 2021.



RECEIVED

OCT 17 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix C

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

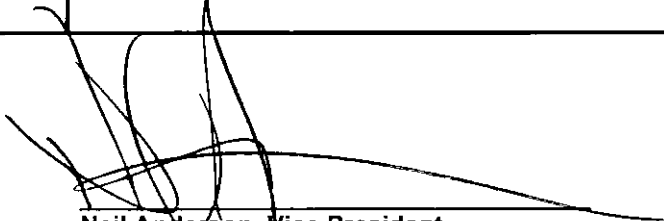
CERTIFICATE OF SERVICE TEMPLATE

On this the 17TH day of OCTOBER 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 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>

Valley Energy Inc.
Ed Rogers
523 South Keystone Avenue
Sayre, PA 18840-0340
PH: 570.888-9664
FAX: 570.888.6199
email: erogers@ctenterprises.org

UGI Utilities, Inc. – Gas Division
David Lahoff
2525 N. 12th Street, Suite 360
Reading, PA 19612-2677
PH: 610.796.3520
Email: dlahoff@ugi.com



Neil Anderson, Vice President,
Vanguard Energy Services, LLC

RECEIVED

OCT 17 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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:

June 3, 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

Applications of VANGUARD ENERGY SERVICES, LLC For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/Broker-Engaged in The Business Of Supplying Natural Gas, Supply Services and Electricity Supply or Electric Generation Services To The Public in The Commonwealth Of Pennsylvania.

VANGUARD ENERGY SERVICES, LLC 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 of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. VANGUARD ENERGY SERVICES, LLC will also be filing an application with the PUC for a license to supply electricity, or electric generation services as (1) a generator,

and supplier of electric power, (2) a broker/marketer engaged in the business of supplying electricity, and (3) an aggregator engaged in the business of supplying electricity. VANGUARD ENERGY SERVICES, LLC proposes to sell electricity, natural gas, and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of VANGUARD ENERGY SERVICES, LLC 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 VANGUARD ENERGY SERVICES, LLC at the address listed below.

VANGUARD ENERGY SERVICES, LLC
Attn: Neil Anderson
850 E Diehl Rd, Suite 142
Nanaville, IL 60563

Robert O. Rolley, Jr.
SUN-GAZETTE LLC

Sworn to and subscribed before me
The 3rd day of June 20 19

Beth A Miller
COMMONWEALTH OF PENNSYLVANIA
Notary Public

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

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:

For publishing the notice attached

Hereto on the above state dates.....\$ 311.12

Probated same.....\$

Total.....\$ 311.12

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.

PA Media Group
2020 Technology Parkway
Mechanicsburg, PA 17050



The Patriot News

VANGUARD ENERGY SERVICES LLC
850 E DIEHL RD STE 142
NAPERVILLE, IL 60563

AD#: 0009186865

Sales Rep: Marianna Aldridge
Account Number:1000886836
AD#: 0009186865

Remit Payment to:
PA Media Group
Dept 77571
P.O. Box 77000
Detroit, MI 48277-0571

Page 1 of 2

Date	Position	Description	P.O. Number	Ad Size	Costs
06/06/2019	Misc Legal Notice PA	PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE Applications of		1 x 55 L	
				Affidavit Notary Fee - 06/06/2019	\$5.00
				Basic Ad Charge - 06/06/2019	\$257.85
				Total	\$262.85

FOR QUESTIONS CONCERNING THIS AFFIDAVIT, PLEASE CALL 717-255-8119



AD#: 0009186865

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 06/06/2019

Victoria Soto

Principal Clerk of the Publisher

Sworn to and subscribed before me this 7th day of June 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**

Applications of VANGUARD ENERGY SERVICES, LLC For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation 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 VANGUARD ENERGY SERVICES, LLC 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 VANGUARD ENERGY SERVICES, LLC at the address listed below.

VANGUARD ENERGY SERVICES, LLC
Attn: Nell Anderson
850 E Diehl Rd, Suite 142
Naperville, IL 60563

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:

June 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.

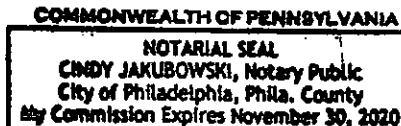


Sworn to and subscribed before me this 3rd day of
June, 2019.



Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE
Applications of VANGUARD ENERGY SERVICES, LLC For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, or Marketer/Broker Engaged in the Business of Supplying Natural Gas, Supply Services, and Electricity Supply or Electric Generation Services To The Public in The Commonwealth of Pennsylvania.
VANGUARD ENERGY SERVICES, LLC 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 of natural gas; and (2) a broker/marketer engaged in the business of providing natural gas services. VANGUARD ENERGY SERVICES, LLC will also be filing an application with the PUC for a license to supply electricity or electric generation services as (1) a generator and supplier of electric power; (2) a broker/marketer engaged in the business of supplying electricity; and (3) an aggregator engaged in the business of supplying electricity. VANGUARD ENERGY SERVICES, LLC proposes to sell electricity, natural gas, and related services in the entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.
The PUC may consider the application without a hearing. Protests directed to the technical or financial fitness of VANGUARD ENERGY SERVICES, LLC 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 VANGUARD ENERGY SERVICES, LLC at the address listed below.
VANGUARD ENERGY SERVICES, LLC
322 Attn: Neil Anderson
860 E. Dick Rd, Suite 342
Naperville, IL 60563

COMMONWEALTH OF PENNSYLVANIA }
 County of Cambria } SS

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
 Applications of VANGUARD ENERGY SERVICES, LLC For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation 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 VANGUARD ENERGY SERVICES, LLC 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 VANGUARD ENERGY SERVICES, LLC at the address listed below.

published that the as of The John the subject said public

On this 12th day of June A.D. 2019, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Christine Marhefka, who being duly sworn according to law, deposes and says as Sales Manager / Major Accounts 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, of Cambria, and Commonwealth of Pennsylvania and latter published in said publication in the regular issues a June 1, 2019; and that the Affiant is not interested in all of the allegations as to time, place and character of

Christine Marhefka

Signed and 12th day of by Christir

VANGUARD ENERGY SERVICES, LLC
 Attn: Neil Anderson
 850 E Diehl Rd, Suite 142
 Naperville, IL 60563

Vivian Ohs

STATEMENT OF ADVERTISING COSTS

0.00 Lines @	\$2.50 per line	0.00
8 Inches @	\$25.00 per inch	200.00
Notary Fee		5.00
Clerical Fee		2.50
Total Cost		207.50

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 _____

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

VANGUARD ENERGY SERVICES LLC
NEIL ANDERSON
850 E DIEHL RD., STE 142 NAPERVILLE IL 60563

Account # 634142
Order # 82342891
Ad Price: 310.30

LEGAL NOTICE PENNSYLVANIA

Ann Marie Fortese

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

06/01/2019

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true *Ann Marie Fortese*

Sworn and subscribed to before me
this 3rd day of June 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

Legal Notices

LEGAL NOTICE

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Applications of VANGUARD ENERGY SERVICES, LLC for Approval to Offer, Render, or Furnish Services as a Supplier, Aggregator, and Broker/Marketer Engaged in the Business of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation 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 VANGUARD ENERGY SERVICES, LLC 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 VANGUARD ENERGY SERVICES, LLC at the address listed below.

VANGUARD ENERGY SERVICES, LLC
Attn: Neil Anderson
850 E Diehl Rd., Suite 142
Naperville, IL 60563

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

Vanguard Energy Services LLC
850 E Diehl Rd Suite 142
Naperville IL 60563

REFERENCE: 98422 364902
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: 06/05/19

TOTAL COST: \$476.00 AD SPACE: 0 Lines

FILED ON: 06/05/19

Applications of VANGUARD ENERGY SERVICES, LLC For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation 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 VANGUARD ENERGY SERVICES, LLC 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 VANGUARD ENERGY SERVICES, LLC at the address listed below.

VANGUARD ENERGY SERVICES, LLC
Attn: Neil Anderson
850 E Diehl Rd, Suite 142
Naperville, IL 60563

EP364902

Sworn to and subscribed before me this 5 day of June 2019

Affiant: Jennifer L. Trott
NOTARY: Ann K. Wilson

Commonwealth of Pennsylvania - Notary Seal
Ann K. Wilson, Notary Public
Erie County
My commission expires March 16, 2023
Commission number 1288920
Member, Pennsylvania Association of Notaries

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:

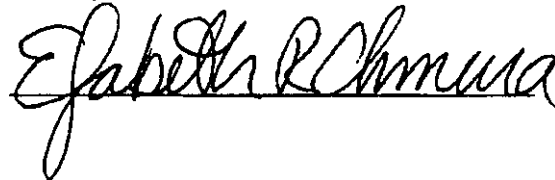
06 of June, 2019

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:
June 06, 2019



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
Vanguard Energy Services, LLC
850 E Diehl Rd, Suite 142
Naperville Illinois 60563

To PG Publishing Company

Total ----- \$550.25

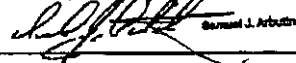
Publisher's Receipt for Advertising Costs

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. Arbuckle

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.

Attorney For

COPY OF NOTICE OR PUBLICATION


PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
Applications of VANGUARD ENERGY SERVICES, LLC For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public in The Commonwealth Of Pennsylvania.
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VANGUARD ENERGY SERVICES, LLC
Attn: Neil Anderson
850 E Diehl Rd, Suite 142
Naperville, IL 60563

Pittsburgh Post-Gazette

Payment Receipt

Receipt No.	22809	Receipt Date	6/3/2019	Receipt Amount
Receipt From	Vanguard Energy Services, LLC			\$ 550.25
Payment Type	Credit card			
Check No.				
Check Date		Collector	Elizabeth Chmura	
Details				

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

<input type="checkbox"/> Return document by mail to: <u>819930</u> Return per instructions on the expedite counter form.	Foreign Registration Statement DSCB:15-412 (rev. 2/2017)  TCO190529JD0354
--	---

Read all instructions prior to completing. This form may be

Fee: \$250

I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):

- | | | |
|---|--|---|
| <input type="checkbox"/> Business Corporation | <input type="checkbox"/> Limited Partnership | <input type="checkbox"/> Business Trust |
| <input type="checkbox"/> Nonprofit Corporation | <input type="checkbox"/> Limited Liability (General) Partnership | <input type="checkbox"/> Professional Association |
| <input checked="" type="checkbox"/> Limited Liability Company | <input type="checkbox"/> Limited Liability Limited Partnership | |

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:

VANGUARD ENERGY SERVICES, LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation is: Delaware

4. The street and mailing address of the association's principal office.

<u>850 E Diehl Rd., Suite 142</u>	<u>Naperville</u>	<u>IL</u>	<u>60563</u>
Number and street	City	State	Zip

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association's jurisdiction of formation in that jurisdiction:

Number and street	City	State	Zip
-------------------	------	-------	-----

2019 MAY 29 AM 9:36

PA DEPT OF STATE

5. The (a) address of the association's proposed registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) OR (b) - not both:

(a) _____
Number and street City OR State Zip County

(b) c/o: Paracorp Incorporated _____
Name of Commercial Registered Office Provider Dauphin County

6. Check one of the following:

- The association may not have series.
- The association may have one or more series.

7. Effective date of registration of foreign association (check, and if appropriate complete, one of the following):

- The Foreign Registration Statement shall be effective upon filing in the Department of State.
- The Foreign Registration Statement shall be effective on: _____ at _____
Date (MM/DD/YYYY) Hour (if any)

8. To be completed by Limited Liability Companies only. Check, and if appropriate complete, one of the following:

The association is a limited liability company which is not organized to render any of the below professional service(s).

The association is a restricted professional limited liability company organized to render one or more of the following professional service(s): (If this box is checked, one or more of the fields below must be checked.)

- Chiropractic Dentistry Law Medicine and surgery
- Optometry Osteopathic medicine and surgery Podiatric medicine Public accounting
- Psychology Veterinary medicine

IN TESTIMONY WHEREOF, the undersigned association has caused this Foreign Registration Statement to be signed by a duly authorized representative thereof this 24th day of May, 2019.

VANGUARD ENERGY SERVICES, LLC


Name of Association



Signature

Vice President
Title

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

Docketing Statement – New Entity DSCB:15-134A (rev. 2/2017)	 134A
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1. Entity Name:

VANGUARD ENERGY SERVICES, LLC

In the case of a foreign association which must use an alternate name to register to do business in Pennsylvania, the alternate name should be given.

2. Tax Responsible Party

Name of individual responsible for initial tax reports: Neil Anderson

Mailing address of individual responsible for initial tax reports:

<u>850 E Diehl Rd., Suite 142</u>	<u>Naperville</u>	<u>IL</u>	<u>60563</u>	<u>DuPage</u>
Number and street	City	State	Zip	County

3. Description of Business Activity:

Market energy related products including natural gas and electricity to consumers.

4. FEIN [Employer Identification Number/Federal Tax Identification Number]: 6 1 - 1 8 0 0 7 5 5

FEIN enables agencies to confirm that Commonwealth accounts are properly matched and that this request is processed without added delay. If the business entity does not currently have an FEIN, it can get a FEIN immediately by applying online at <http://www.irs.gov/Businesses/Small-Businesses-&-Self-Employed/Employer-ID-Numbers-EINs>.

5. FYE [Tax Year or Fiscal Year End]: 1 2 / 3 1
 Month / Day

A fiscal year (FY) is a period that a company or government uses for accounting purposes and preparing financial statements. For tax purposes, the Internal Revenue Service (IRS) allows companies to be either calendar-year taxpayers or fiscal-year taxpayers. Supply month and day for intended tax year end, e.g. 1/31, 2/28, 3/31, 4/30, 5/31, 6/30, 7/31, 8/31, 9/30, 10/31, 11/30 or 12/31.

exhibit B PUBLIC

Pennsylvania Natural Gas Supplier (NGS) License Application

Applicant: Vanguard Energy Services, LLC

Item 2 Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.

Response:

exhibit C PUBLIC

Pennsylvania Natural Gas Supplier (NGS) License Application

Applicant: Vanguard Energy Services, LLC

Item 7 b Audited financial statements exhibiting accounts over a minimum two year period.

Response:

exhibit D PUBLIC

Pennsylvania Natural Gas Supplier (NGS) License Application

Applicant: Vanguard Energy Services, LLC

Item 7 b Audited financial statements exhibiting accounts over a minimum two year period.

Response:

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Vanguard Energy Services, LLC :
 : **10-0628**
Application for Certificate of Service :
Authority under Section 19-110 of the :
Public Utilities Act. :

ORDER

By the Commission:

I. Introduction

On November 1, 2010, Vanguard Energy Services, LLC (“Applicant” or “Vanguard ”) filed a verified Application with the Illinois Commerce Commission requesting a certificate of service authority as an Alternative Gas Supplier (an “AGS”) in Illinois pursuant to Section 19-110 of the Public Utilities Act (220 ILCS 5/19-110) (“the Act”), and 83 Ill. Adm. Code 551.10 *et seq.*

On October 28, 2010, notice of the application was published in the official state newspaper pursuant to Section 19-110(c) of the Act and Section 551.30(a). After receiving notice of various deficiencies from Commission Staff, the Administrative Law Judge (“ALJ”) on November 22, 2010, issued a ruling requiring Vanguard to provide additional information required under Section 19-110 and under Part 551, so that certain deficiencies could be corrected and certain information in the Application could be clarified. On November 30, 2010, Vanguard filed an Amended Application including attachments. As set forth below, this response fully met the conditions contained in the ALJ ruling. Vanguard should be issued an AGS certificate.

II. Statutory Authority

Unless an entity has been certificated as an AGS to provide utility or utility-related services, it cannot provide those services. The statutory provisions applicable to the certification of AGSs are set forth in Section 19-110 of the Act. Section 19-110(a) applies only to Alternative Gas Suppliers that serve, or seek to serve, residential or small commercial customers. As is set forth herein, Section 19-105 of the Act specifically defines the customers who are eligible for AGS service. (220 ILCS 5/19-105).

Provisions relating to the AGS application process are contained in 220 ILCS 5/19-110 (b), (c), (d) and (e). An applicant for AGS certification must identify the areas

to be served and types of service to be offered and must demonstrate sufficient technical, financial and managerial fitness to provide the proposed services. This Commission is required to enter an order within 45 days after publication of a "properly filed" application. There is no indication here that the Applicant's 45-day period should be extended.

Regulations regarding certification of Alternative Gas Suppliers are set forth in 83 Ill. Adm. Code 551.10 *et. seq.* Procedures and requirements pertaining to these applications are contained in Sections 551.20 through 551.110. Procedures for reporting continuing compliance are also set forth in Sections 551.120 through 551.170.

III. Description of the Applicant and of the Proposed AGS Services

Applicant is an Oklahoma limited liability company authorized to transact business in Illinois, as required by 551.20(e). (Verified Amended App. ¶7 and Attachment A). In response to the requirements of Section 551.30(c)(1), Applicant stated that it is an accessible, responsive, highly expert energy services company that provides added-value solutions and risk management for Midwestern commercial and industrial end-users. Applicant further stated that it is composed of seasoned frontline energy executives who have leveraged decades of experience across all facets of the energy industry, to create a new model for risk management and customer service that transcends current standards. Applicant's clients enjoy state of the art risk management and commodity sourcing by experienced professional energy managers who are nimble entrepreneurs with big company resources. (Verified Amended App. ¶8).

Applicant's Verified Amended Application states that it does not currently have authority from the Commission to act as an AGS, but it plans to offer natural gas supply to small commercial customers of Nicor Gas Co. ("Nicor") and People's Gas Light and Coke Co. ("Peoples") in Illinois. (Verified Amended App. ¶¶3, 9-10). Applicant will not provide service to residential customers. (Verified Amended App. ¶5(b)).

As required by Section 551.30(c)(3), proof of notification to each utility of Applicant's intent to serve in the utility's service area is contained in Attachment B to the Amended Application. (Verified Amended App. ¶11). With regard to Section 551.70(a), Applicant does not seek to serve customers within a geographic area that is smaller than a gas utility's service area. (Verified Amended App. ¶15).

Applicant has not been denied a natural gas supplier license in any state in the United States, has not had a natural gas supplier license suspended or revoked by any state in the United States, has no other natural gas supplier license applications pending in the United States, and is not the subject of any lawsuits filed in a court of law or formal complaints filed with a regulatory agency alleging fraud, deception or unfair marketing practices, or other similar allegations. (Verified Amended App. ¶23).

IV. AGS Requirements and Obligations

As required by Section 551.30(d)(2), Applicant certifies that it will comply with all applicable terms and conditions required by Section 19-115 of the Act (220 ILCS 5/19-115). (Verified amended App. ¶12). Applicant also certifies in its Verified Amended Application that, pursuant to Section 551.20(a-d), it will comply with all applicable Federal, State, regional and industry rules, practices, policies, procedures and tariffs for the use, operation, maintenance, safety, integrity, and reliability of the interstate natural gas system. It will further comply with informational and reporting requirements that the Commission may, by rule, establish and will also comply with all other applicable laws, regulations and Commission rules and orders. (Verified Amended App. ¶15). Applicant will also submit evidence of good-faith schedules of natural gas deliveries in accordance with applicable tariffs, as required by Section 551.20(a). (Verified Amended App. ¶16).

In accordance with Section 551.40 of the Commission's regulations, Applicant agrees to adopt and follow rules and procedures ensuring that any authorization received from customers, customer billing records, and requests for delivery service transmitted to utilities are retained for a period of not less than two calendar years after the calendar year in which they were created. (Verified Amended App. ¶13). Applicant also agrees to adopt and follow rules and procedures to preserve the confidentiality of customer data. (Verified Amended App. ¶14).

As required by Section 551.70(b)(1), Applicant certifies that all marketing materials that make statements concerning prices, terms and conditions of service contain information that adequately discloses the prices, terms and conditions of the products or services that the Applicant is offering or selling to the customers. (Verified Amended App. ¶16).

Pursuant to 551.70(b)(2), Applicant certifies that, prior to switching any customer from another supplier, the Applicant will provide the customer with written information that adequately discloses, in plain language, the prices, terms and condition of the products and services being offered and sold to the customer. (Verified Amended App. ¶17).

Under Section 551.70(b)(4), Applicant certifies that it will provide refunds of any deposits with interest within 30 days after the date that the small commercial customer changes gas suppliers or discontinues service if the customer has satisfied all of its outstanding obligations to the Applicant at an interest rate set by the Commission which shall be the same as that required of gas utilities. (Verified Amended App. ¶19).

In accordance with Section 551.70(b)(5), Applicant certifies that it will provide timely refunds of any undisputed overpayments upon oral or written request of the small commercial customer. (Verified Amended App. ¶20).

In order to comply with Section 551.20(b)(6), Applicant will file procedures with the Commission that address the manner in which the Applicant will resolve disputed bills with its customers. (Verified Amended App. ¶21).

As required by Section 551.70(b)(7), Applicant certifies that it will inform its customers how to contact the Commission to obtain consumer education materials provided pursuant to Section 9-125 of the Act (220 ILCS 5/19-125). (Verified Amended App. ¶22).

Applicant also certifies, pursuant to Section 19-110(e)(1)(C) of the Act (220 ILCS 5/19-110 et seq.), its commitment of resources to the management of sales and marketing staff through affirmative managerial policies, independent audits, technology, hands-on field monitoring and training, and, in the case of any sales personnel or sales agents within the State of Illinois, the Applicant's managerial presence within the State. (Verified Amended App. ¶24).

Attachment D to the Verified Amended Application contains Applicant's License or Permit Bond in the sum of \$150,000, which satisfies the requirements of Section 551.50(a). (Verified Amended App. ¶25). Attachment E to the Verified Amended Application contains a DNBi Risk Management report showing that Applicant has a Dun & Bradstreet Composite Credit Appraisal of "3" or lower and a PAYDEX score of "70" or higher. This complies with the requirements of Section 551.80(a). (Verified Amended App. ¶26).

Applicant asserts that the technical qualifications of John F. Weir and Scott Pellock meet the requirements of Section 551.90. Attachment F to the Verified Amended Application discloses that John F. Weir, while at Nicor Energy, gained five years experience working with customer choice programs in connection with Nicor and Peoples Gas. It also shows that Scott Pellock has four years experience working on the Nicor Customer Select program while employed by Reliant Energy Services. Mr. Pellock also has over seven years of gas sales experience with Applicant. Each of these individuals has more than four years of natural gas sales experience and two years experience working with NAESB rules. (Verified Amended App. ¶27).

Attachment G to the Verified Amended Application sets forth the managerial qualifications of Mr. Weir, Mr. Pellock, Paul Bougadis and Neil Anderson. Applicant states that these four individuals have been operating Applicant for the past seven years and have responsibility for company profits and losses. Mr. Pellock and Mr. Bougadis have over four years of natural gas sales experience while working for Applicant. Applicant states that the qualifications outlined in Attachment G satisfy the requirements of Section 551.100. (Verified Amended App. ¶28).

V. Staff Position

The Commission's Engineering Division stated that the Amended Application satisfies its concerns and that no deficiencies exist.

VI. Commission Analysis and Conclusions

The Commission has reviewed the Amended Application and attachments filed in response to the ALJ ruling requesting additional information. We find that The Amended Application satisfies the requirements of the Act and the applicable regulations and conclude that the Applicant's Amended Application requesting certification as an AGS should be granted.

A "small commercial customer" is defined as:

[A] non-residential retail customer of a natural gas utility who is identified by the alternative gas supplier, prior to becoming a customer of the alternative gas supplier, as consuming 5,000 or fewer therms of natural gas during the previous year; provided that any alternative gas supplier may remove the customer from designation as a "small commercial customer" if the customer consumes more than 5,000 therms of natural gas in any calendar year after becoming a customer of the alternative gas supplier. (220 ILCS 5/19-105).

Applicant plans to market its services only to small commercial customers. It stated affirmatively in ¶5(b) of the Amended Application that it does not intend to provide service to residential customers, and it declined to respond to the requirements of ¶18 of the Amended Application, as it planned to serve only small commercial customers. For that reason, we consider it prudent to point out that the certificate to be issued would specify service only to small commercial customers. Applicant would be prohibited from marketing or providing service to any customer who does not fit the definition of small market customer, as shown above.

Findings and Ordering Paragraphs

The Commission, having reviewed the entire record herein and being fully advised in the premises, is of the opinion and finds that:

- (1) Vanguard Energy Services, LLC, an Oklahoma limited liability company authorized to transact business in Illinois, seeks authority to operate as an Alternative Gas Supplier pursuant to Section 19-110 of the Act;
- (2) the Commission has jurisdiction over Vanguard Energy Services, LLC;
- (3) the facts recited herein and the conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) as required by Section 19-110(e)(1) of the Act, Vanguard Energy Services, LLC possesses sufficient technical, financial, and managerial

resources to provide natural gas service to eligible small commercial customers of Nicor and People's Gas in Illinois, as defined in Section 19-105 of the Act;

- (5) Vanguard Energy Services, LLC should comply with Section 19-110(e)(2), (3), and (5) of the Act and all other applicable statutes, rules, regulations and Commission orders as now in effect or as hereafter amended;
- (6) Vanguard Energy Services, LLC should be granted a Certificate of Service Authority to act as an Alternative Gas Supplier in Illinois to small commercial customers as defined in Section 5/19-105 of the Act, and it shall comply with all applicable Commission rules and orders;
- (7) Vanguard Energy Services, LLC should not market or provide service to any individual or entity that does not meet the definition of small commercial customer as set forth in Section 5/19-105 of the Act;
- (8) Vanguard Energy Services, LLC should file a Petition with this Commission seeking withdrawal of its certificate when it ceases to transact business in Illinois.

IT IS THEREFORE ORDERED by the Commission that Vanguard Energy Services, LLC be, and is hereby, granted a Certificate of Service Authority to operate as an Alternative Gas Supplier in Illinois.

IT IS FURTHER ORDERED that the Certificate hereinabove granted shall be the following:

CERTIFICATE OF SERVICE AUTHORITY

IT IS HEREBY CERTIFIED that Vanguard Energy Services, LLC is authorized to provide service as an Alternative Gas Supplier to small commercial customers of Nicor and People's Gas in Illinois, as defined in Section 5/19-105 of the Act .

IT IS FURTHER ORDERED that Vanguard Energy Services, LLC shall not market or provide service to any individual or entity that does not meet the definition of small commercial customer as set forth in Section 5/19-105 of the Act.

IT IS FURTHER ORDERED that Vanguard Energy Services, LLC shall comply with Section 19-110(e)(2), (3), and (5) of the Act and all other applicable statutes, rules, regulations and Commission orders, as now in effect or as hereafter amended.

IT IS FURTHER ORDERED that Vanguard Energy Services, LLC should file a Petition with this Commission seeking withdrawal of its certificate when it ceases to transact business in Illinois.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 15th day of December, 2010.

(SIGNED) MANUEL FLORES

Acting Chairman

The Public Utilities Commission of Ohio

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate

Issued pursuant to Case Number(s):

17-2485-GA-AGG

is

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:

18-634G(1)

Granted to:

Vanguard Energy Services, LLC

Whose office or principal place of business is located at:

850 E. Diehl Rd #142, Naperville, IL 60563

And is hereby certified to provide:

Retail Natural Gas Aggregator/Broker Services

within the state of Ohio, for a two-year period.

Certification Effective:

January 11, 2018 through January 11, 2020

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

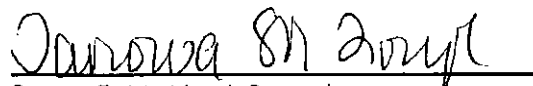
This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

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: **January 18, 2018**

By Order of
The Public Utilities Commission of Ohio



Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Susan Patterson, Acting Secretary
Beverly Hoskinson, Acting Secretary

exhibit G PUBLIC

Pennsylvania Natural Gas Supplier (NGS) License Application

Applicant: Vanguard Energy Services, LLC

Item 8 a Type of customers and number of customers Applicant currently serves.

Response:

exhibit H PUBLIC

Pennsylvania Natural Gas Supplier (NGS) License Application

Applicant: Vanguard Energy Services, LLC

Item 8 a Staffing structure and numbers as well as employee training commitments.

Response:

Neil Anderson, CPA

Skills

- Natural gas storage trading
 - Treasury
 - Regulatory
 - Financial accounting and reporting
 - Credit and collections
-

Current Experience

Vice President Operations and Financial Services, Vanguard Energy Services, LLC 2003 – Present (16 years)

Education

Licensed Certified Public Accountant in Illinois

Master of Business Administration from Northern Illinois University

Bachelor of Science in Accounting from University of Wisconsin-Platteville

Paul Bougadis

Skills

- Natural gas trading
 - Sales management
 - Product development
 - Sales
 - Credit and collections
-

Current Experience

Vice President Business Development, Vanguard Energy Services, LLC 2003 – Present
(16 years)

Education

Bachelor of Science in Marketing and Business Administration from Eastern Illinois
University

Scott Pellock

Skills

- Sales
 - Sales management
 - Product development
 - Natural gas trading
-

Current Experience

Vice President Sales, Vanguard Energy Services, LLC 2003 – Present (16 years)

Education

Bachelor of Science in Business Administration from University of Wisconsin-Platteville

John Weir

Skills

- Natural gas structured product developer
 - Marketing
 - Natural gas trading
 - Manager of information systems
 - Risk management
 - Sales
-

Current Experience

Vice President Fulfillment, Trading and Risk Management, Vanguard Energy Services, LLC 2003 – Present (16 years)

Education

Bachelor of Science in Marketing from Bradley University



VALLEY ENERGY

523 S. Keystone Avenue, P.O. Box 340, Sayre, PA 18840
800/998-4427 • 570/888-9664 • FAX 570/888-6199

October 15, 2019

VIA EMAIL

Vanguard Energy Services, LLC
Neil Anderson, Vice President
850 E. Diehl Rd., Suite 142
Naperville, IL 60563
nanderson@vanguardenergy.net

Dear Mr. Anderson:

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

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

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

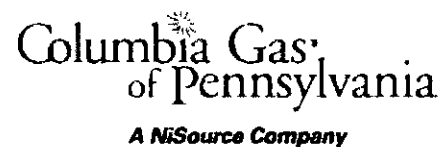
Sincerely,

/s/Edward Rogers

Edward E. Rogers
President & CEO

EER/ss

cc: J. Levering, Valley Energy



October 8, 2019

Neil Anderson
Vanguard Energy Services, L.L.C.
850 E Diehl Rd., Suite 142
Naperville, IL 60563

Dear Neil Anderson:

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

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

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

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

Sincerely,

A handwritten signature in cursive script that reads 'Kyla Davis'.

Kyla Davis
Manager of Choice and Transportation Support Services



National Fuel

exhibit J

October 8, 2019

Neil Anderson, Vice President
Vanguard Energy Services, LLC
850 East Diehl Road, Suite 142
Naperville, IL 60563

Re: Vanguard Energy Services, LLC

Dear Neil,

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

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

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

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

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

Yours truly,

Nicole Barker
Transportation Services Department



exhibit J

375 North Shore Drive
Pittsburgh, Pennsylvania 15212

www.peoples-gas.com

Carol Scanlon
Manager, Rates & Regulation

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

October 8, 2019

Neil Anderson
Vice President
Vanguard Energy Services, LLC
850 E Diehl Rd., Suite 142
Naperville, IL 60563

Dear Mr. Anderson:

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

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

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

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

Sincerely,

Carol Scanlon
Manager, Rates and Regulation
Peoples Natural Gas Company LLC

Cc: Stephen Kelly
Mina Speicher



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

exhibit J

October 15, 2019

Mr. Neil Anderson
Vanguard Energy Services, LLC
850 E. Diehl Road, Suite 142
Naperville, IL 60563
Email: nanderson@vanguardenergy.net

RE: Security Requirement Bond for Vanguard Energy Services, LLC

Dear Mr. Anderson:

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

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'John Zuk', is written over the printed name.

JOHN ZUK
Sr. Vice President, Gas Management

/dls

October 7, 2019

Vanguard Energy Services, LLC
850 East Diehl Road, Suite 142
Naperville, IL 60563

Re: Broker Requirements

Dear Vanguard Energy Services, LLC:

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

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

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

Respectfully submitted,



Carlos P. Thillet
Manager, Gas Supply and Transportation
2301 Market Street
Philadelphia, Pa 19103



exhibit J

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

610-796-3400

VIA E-MAIL

October 7, 2019

Vanguard Energy Services, LLC
850 E. Diehl Road
Suite 142
Naperville, IL 60563

ATTENTION: Neil Anderson, Vice President

**RE: Vanguard Energy Services, LLC
Application to Serve as a Natural Gas Broker**

Dear Mr. Anderson,

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

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

Sincerely,

David E. Lahoff
Senior Manager
Tariff & Supplier Administration

ORIGIN ID: DPAA (830) 955-1500
RICK SMITH

850 E DIEHL RD
STE 142
NAPERVILLE, IL 60563
UNITED STATES US

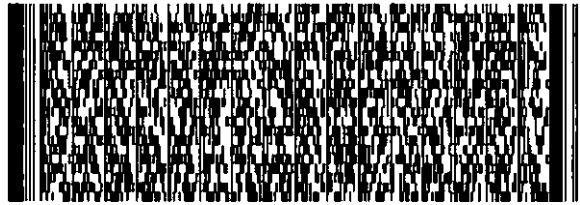
SHIP DATE: 17OCT19
ACTWGT: 1.00 LB
CAD: 109948131/NET4160

BILL SENDER

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

(717) 783-5242 REF
INV
PO DEPT

567.012A3C05A2

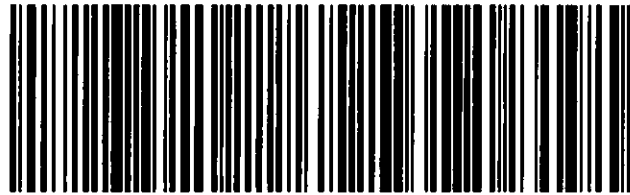


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