

# HARBOR COMPLIANCE.

October 11, 2019

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

RE: Responses to data requests regarding the application of Finance Guru LLC for an natural gas supplier license; Docket No. A-2019-3012217

Dear Secretary Chiavetta:

In response to the Public Utility Commission's data requests sent to Finance Guru LLC Finance Guru") on September 24, 2019, please find enclosed Finance Guru's responses to the Commission's data requests. Matters requested by the Commission which contain Finance Guru's confidential information have been labeled as such and included in a sealed envelope.

If you or any member of the Commission has any questions regarding the response, please do not hesitate to contact me at your earliest convenience.

Sincerely,

Amanda Gordon  
Compliance Analyst

CC:

Jeff McCracken, Bureau of Technical Utility Services, [jmccracken@pa.gov](mailto:jmccracken@pa.gov))

Bureau of Investigation & Enforcement  
Office of the Attorney General  
Office of Consumer Advocate  
Commonwealth of PA Dept. of Revenue  
Small Business Advocate  
Columbia Gas of PA, Inc.  
Peoples Natural Gas Company LLC  
Peoples Gas Company LLC  
PECO  
Philadelphia Gas Works

National Fuel Gas Distribution Corp.  
UGI Utilities, Inc.- Gas Division  
Valley Energy Inc.  
Peoples Natural Gas - Equitable Division

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OCT 11 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

[info@harborcompliance.com](mailto:info@harborcompliance.com) • Phone: 888-995-5895 • Fax: 717-202-2576  
1830 Colonial Village Lane, Lancaster, PA 17601

Harbor Compliance is not an accounting or law firm and does not provide tax, financial, or legal advice.

Docket No. A-2019-3012217  
Finance Guru LLC  
Data Requests

1. Reference Application, Section 1.a, Identity of Applicant – Applicant failed to provide its web address. Please provide an updated application page with the appropriate corrections.

Response: Updated application page with appropriate correction provided. See Attached.

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Finance Guru LLC, d/b/a \_\_\_\_\_, for approval to offer, render, furnish, or supply natural gas supply services as a(n) [as specified in item #4b below] to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

### 1. IDENTIFICATION AND CONTACT INFORMATION

- a. **IDENTITY OF THE APPLICANT:** Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:

Finance Guru LLC  
525 W. Monroe, Suite 900,  
Chicago IL 60661  
312.796.9748 www.financeguru.com

- b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

Northwest Registered Agent, LLC  
1150 First Ave, STE 511  
King of Prussia, PA 19406 (509) 768-2249

- 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 Pandey, Legal Director  
525 W. Monroe, Suite 900,  
Chicago IL 60661  
312-796-9748  
fg.legal@financeguru.com

- d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

Neil Pandey, Legal Director  
525 W. Monroe, Suite 900,  
Chicago IL 60661  
312-796-9748  
fg.legal@financeguru.com

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** Provide the name, title, address, telephone number, fax number, and e-mail OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED) responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Natural Gas Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed NGSs.

Neil Pandey, Legal Director	Levon Mock, Compliance Director
525 W. Monroe, Suite 900,	525 W. Monroe, Suite 900
Chicago IL 60661	Chicago, IL 60661
312-796-9748	872-588-8050
fg.legal@financeguru.com	levon.mock@financeguru.com

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Data Requests

2. Reference Application, Section 1.b, Registered Agent – Applicant failed to provide a telephone number for its Registered Agent. Please provide an updated application page with the appropriate corrections.

Response: Updated application page with appropriate correction provided. See Attached.

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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fg.legal@financeguru.com

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Chicago IL 60661	Chicago, IL 60661
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3. Reference Application, Section 7.b, Financial Fitness – Applicant provided minimal documentation to demonstrate financial fitness. Please provide additional financial fitness documentation that may include two recent consecutive years of financial statements, two recent consecutive years of income tax filings, and three recent consecutive months of bank statements.

Response: The Company has not been in existence for two years. See attached financial statements and bank statements

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4. Reference Application, Section 7.f, Taxation – Applicant failed to provide a Revenue ID Number. Please resubmit a complete Tax Certification Statement.

Response: See attached Tax Certification Statement.

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5. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide contracts for any consultant(s) used to demonstrate Technical Fitness. Please provide the missing documentation.

Response: See the attached copy of Seyi Fabode contract with Finance Guru.



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6. Reference Application, Section 8.b, Proposed Marketing Method – Applicant failed to check the boxes next to Affiliate and External Third-Party. Please provide an updated application page with the appropriate corrections.

Response: Updated application page with appropriate correction provided. See Attached.

- 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.

Ann Shilney, Accounting Manager,  
525 W. Monroe, Suite 900 Chicago, IL 60661  
312-448-7758,  
fg.accounting@financeguru.com

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

*All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.*

*Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.*

## 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:

See Attachment NGS 8.a

- Applicant's previous experience in the natural gas industry.
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- 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): See NGS Attachment 8.b and c

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7. Reference Application, Section 8.d, Oversight of Marketing – Applicant failed to explain its processes, including any verification procedures, used to ensure its employees and/or subcontractors operate ethically and do not slam customers. Please provide the missing documentation.

Response: See attached Revised Marketing Strategies.

# Finance Guru

## Ethical Practices

### I. Online Platform

Finance Guru LLC recognizes the importance of protecting personal information and is committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which Finance Guru operates. The [Privacy Policy](#) on our website describes Finance Guru's general privacy practices that apply to the personal data Finance Guru processes, how Finance Guru processes it, and for what purposes.

Finance Guru [Terms of Use](#) are prominently shown on the website to explain the high integrity expectations of Finance Guru and users of the website and applications.

### II. Door-to-Door Sales

Finance Guru subcontractors are contractually obligated to act in accordance with the law and the energy supplier's directives, policies, and procedures. Subcontractors must maintain compliance by following requirements such as: only performing services during permissible contact hours in accordance with state ordinances and energy supplier guidelines; respecting Do Not Knock lists; procuring and maintaining all necessary permits and licenses to conduct services; obtaining insurance; providing professional services to the public; going through background checks before performing services; and wearing badges when performing services. Furthermore, Finance Guru has a compliance program that ensures that subcontractors are in compliance with the provisions of the agreements that they enter with Finance Guru.

Finance Guru will address the potential issue of slamming by implementing the following procedures:

- Subcontractor will be in compliance with all applicable federal, state, county and local laws. The Subcontractor will obtain all authorizations necessary when marketing and completing a sale with a potential customer. The potential customer must speak directly to the authorized utility account holder as the potential customer is the only one that can authorize the switch of their energy supplier. **The Subcontractor will be removed from all Finance Guru campaigns if there is a violation of slamming.**
- Subcontractor will require the potential customer to confirm that they are the authorized utility account holder on the tablet, and record their signature during the sign-up process.
- Subcontractor will use a third-party verification call with the potential customer to confirm that they are the authorized account holder and that they are switching their energy supplier. The verification agent will repeat the new details back to the potential customer and confirm that the potential customer is making the decision to complete the switch to the new supplier. These calls will be recorded, with the potential customer's consent, to verify the sale in the case that any issues arise.

## Marketing Strategies for Finance Guru

**SEO:** Getting the website to rank organically for specific keywords is crucial because it's free traffic (we don't have to pay for each visitor). There are two ways to improve our SEO: keyword focused content and backlink building. With keyword focused content, we'll be writing articles and creating pages based on what users are searching. We're able to find this information using SEMRush and Ahrefs. Backlink building is getting links from other websites because Google judges your domain's authority on how many links you have from other authoritative websites. One way to build powerful links is through a scholarship. Edu links are more powerful than .coms and .nets.

**PPC:** PPC stands for pay-per-click and these are the ads you see in Google and other search engine searches. They're at the top of the search results (above all organic results), however, we'll pay for every click we receive. That's why it's important to start PPC when we're confident with our comparison options – this strategy is less about traffic and more about driving conversions. We'll focus heavily on doing keyword research and ensuring that we're getting highly convertible traffic using "buying-focused" keywords. In addition, we'll split test different ads every 2-3 weeks. There will also be conversion focused landing pages to further convince users to start the customer journeys.

**Social media:** In order to increase traffic, we need to focus on brand building and that's exactly what we'll get from a social media marketing strategy, especially Facebook. Clicks on Facebook tend to cost \$0.50 - \$0.75 so we'll be able to get visitors easily. With attractive ads, it should encourage people to learn more about our brand and visit the website. As time goes on, we can also create unique content specifically for social media and giveaways that users can sign-up for using their email and phone number. Once we have that information, we can market to them with emails and telemarketing calls. Once we establish a presence on Facebook, we can move our social media efforts to Twitter, Instagram and LinkedIn.

**Email marketing:** Much like social media marketing, email marketing is rather inexpensive. As we collect email addresses from leads who agree to provide their information, we'll be able to keep our brand in front of this audience, whether they used Finance Guru or just opted in to provide us with their email. It's a great way to get someone to convert multiple times in different verticals. However, until we start building our own list, we'll need to buy lists from reputable and ethical sources. At the very least, it's brand building to help draw traffic to our website.

**Call center/telemarketing:** When we buy the lists for the email marketing, there should also be phone numbers associated. We'll be able to call those people with telemarketers as well. Sometimes, people won't open their emails (Gmail sends those emails to a promotions tab that many people don't check regularly), so it might be easier to reach them with a phone call. We can also follow up with users to see if they'd be interested in any of our other verticals.

**Affiliate Marketing:** We will engage digital marketing experts (affiliates) to drive highly targeted traffic to Finance Guru and our offers. Based on the offer, the affiliates would be paid a commission based on the action of the Finance Guru visitor such as a form submit or sale. We would expect conversion rates on affiliate traffic to range from 6%-10%. Quality is an important metric to monitor and include KPI requirements for payouts in order to prevent any fraud or bot traffic.

**Television:** It should go without say that it's very difficult to increase traffic on your website if people don't know about the brand. There needs to be a much larger push to build brand awareness. If there's one way to build brand awareness quickly, it's with a catchy, memorable commercial. While television can be rather expensive, it's a great way to get your name out there and build curiosity. Much like PPC, spending money on television ads should be done once we're confident with the comparison part of our website. Once we're ready, we should investigate cheap slots to start (non- prime time on cable networks). It's also important to not that there will be some charges to create the commercial as well. We would either need the equipment or software to do it ourselves or pay for someone to make the commercial entirely.

**Radio:** Radio is very similar to television; it's a great way to build your brand through a memorable advertisement. We

can create an audio commercial cheaper as well. Paying for spots on radio station is also much cheaper than television. However, terrestrial radio is starting to die so we need to do one of two things (or both) – find the largest stations in each area and advertise on them or put our ads on satellite radio. This may be considered influencer marketing because they don't have traditional commercials on satellite radio. The DJ or host will read out the advertisements.

**Direct mail:** Another economical direction we can go to improve traffic is to build out a direct mail list. Giving someone a physical pamphlet or magnet will make them more likely to investigate our website. With a magnet especially because that will be plastered on their fridge and seen by family and friends each day. We can start sending mail with lists that are purchased from reputable and ethical sources. Addresses are sometimes included with emails and phone numbers.

**Digital streaming:** Many people are getting rid of or not using traditional cable and radio anymore. To reach people who have cut the cord, we need to advertise on streaming services. Spotify, Pandora, Hulu and Xfinity OnDemand are all options we can target. They have ways of segmenting audiences based on their location, what they're watching/listening to and their demographics. Also, we can use the same commercial we use for tv or radio to maximize our investment into commercial production.

**Direct sales:** We will leverage independent sales teams to help advertise Finance Guru. The independent sales reps can go door-to-door and sell people on Finance Guru. If they're not interested now, at the very least, leave a physical flyer or magnet behind with the company's website and phone number so they can reach out to us on their time. This will help improve traffic coming to our website. In addition, something like a magnet will be used, keeping our brand present.

**Mobile app ads:** Many free apps get their money from advertising. Whether it's a video that plays in-between lives of a game or a banner that's always present, this is a great way to build brand awareness. It should also be known that these clicks are much cheaper than other marketing strategies. This is a great option for the future.

**PR:** One of the more powerful branding strategies is to use PR agencies to get articles about Finance Guru in major publications. Not only will this improve our brand awareness, but we'll also get backlinks from all these major publications who have powerful domains. We can also endorse events, groups and causes. Not only does that give Finance Guru a good image, but it gets us a backlink from another powerful domain.

**Text:** SMS or text marketing is something that can help us once we collect some phone numbers from our users who have provided their information to Finance Guru to be contacted with offers. We can send exclusive offers or information to people who either sign up for text alerts or fill out one of our forms. The idea of getting exclusive deals is a great way to encourage people to sign up for text alerts because they're not give up anything and they can end up saving money through one of these deals.

**Print:** While many people would argue that print marketing is dying, there are still some opportunities that can be used to improve brand awareness. One option is to put ads in the newspaper and magazines. These are cheaper options but may have a smaller number of eyes on them. Other options that will be seen more are billboards over highways, train wraps and bus advertisements. These will be seen by people all throughout major cities, getting our name out there more.

**Face to face/event marketing:** We plan to leverage event marketing. This will allow us to speak and interact with hundreds of people at each event (thousands if you go to larger events in major cities). We will further build our email and phone number list through giveaways and sign-up forms, where people are opting into receiving offers from Finance Guru. Finally, it's a great way to build links through these events.

**Influence marketing:** While this isn't something we are doing immediately, we might use influence marketing in the future. An influencer can be anyone from a youtuber/podcaster to an actor/athlete. While this is a great way to build brand awareness and get people to use Finance Guru, it can be very expensive. Another option with influencer marketing is to do a sponsorship with a sports team. For instance, with hockey, we can sponsor the powerplay. Every time that situation occurs, Finance Guru would be mentioned.

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Finance Guru LLC  
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8. Reference Application, Section 12, Notarized Proofs – Applicant failed to provide a notarized proof of publication for the Harrisburg Patriot-News. Please provide the notarized proof of publication for the above newspaper.

Response: The original notarized proof of publication for the Harrisburg Patriot-News was submitted with the Applicant's Electric Generation Supplier application at Docket No. A-2019-3012216. A copy of the proof of publication is attached.

Verification:

Date: 2nd of October, 2019

I, Neil Pandey, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

  
Neil Pandey, Legal Director

OCT 11 2019

PA PUBLIC UTILITIES COMMISSION  
SECRETARY'S OFFICE



AD#: 0009266594

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 07/30/2019

*Victoria Soto*

Principal Clerk of the Publisher

Sworn to and subscribed before me this 31th day of July 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 Finance Guru LLC For Approval To Offer, Render, or Furnish Services as a Broker Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply Services, To The Public in The Commonwealth Of Pennsylvania.

Finance Guru LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. Finance Guru LLC will also be filing an application with the PUC for a license to supply electricity supply services (1) a broker/marketer engaged in the business of supplying electricity. Finance Guru LLC proposes to sell electricity, natural gas, and related services in Citizens' Electric, Duquesne, Met Ed, PECO (electric), Penelec, Penn Power, Pike, PPL, UGI, Wellsboro, West Penn, Columbia Gas, National Fuel Gas, PECO (gas), Peoples - Equitable, Peoples Natural Gas, Peoples Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Div., and Valley Energy 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 Finance Guru 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 Neil Pandey at the address listed below.

By and through Representative:  
Neil Pandey, Legal Director  
Finance Guru LLC  
525 W. Monroe St, Suite 900  
Chicago, IL 60661  
312-796-9748

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