

Honorable Energy LLC
210 W High St
Manheim, PA 17545

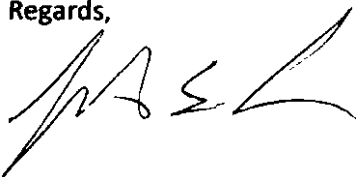
1/10/2020

Dear Secretary Chiavetta,

Honorable Energy LLC has filed for a license to broker natural gas in Pennsylvania. The Docket Number for this filing is A-2019-3013888.

In this NGS Application Package there are several typographical errors when referencing the company's name. Please know that the correct name of the applicant is Honorable Energy LLC.

Regards,



Jon Loercher
President/Owner
Honorable Energy LLC
(717) 278-1064

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I Jon Loercher, President/Owner of Honorable Energy LLC, 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).

Jon Loercher 1/30/2020

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Docket No. A-2019-3013888
Honorable Energy LLC
Data Requests

1. Reference Application, Section 1.a, Identity of Applicant – The applicant lists its name inconsistently in its NGS Application Package. The PA Department of State stated that the applicant’s registered name is Honorable Energy LLC. Due to this inaccuracy, please provide a letter that states that the applicant’s name in the NGS Application Package contains numerous typographical errors and the correct name of the applicant is Honorable Energy LLC.
2. Reference Application, Section 5.a, Customer/Regulatory/Prosecutory Actions – Applicant failed to provide a satisfactory response to demonstrate compliance. Please provide a detailed response to Question 5.a. If applicant has no cases to list, please list “None”.
3. Reference Application, Section 5.c, Customer/Regulatory/Prosecutory Actions – Applicant failed to provide a satisfactory response to demonstrate compliance. Please provide a detailed response to Question 5.c. If applicant has no cases to list, please list “None”.
- ④ Reference Application, Section 7.a, Financial Fitness – Applicant failed to provide a natural gas distribution company bonding letter for each utility in whose service territory it wishes to operate. Please provide the missing documentation.
- ⑤ Reference Application, Section 7.b, Financial Fitness – Applicant provided minimal documentation to demonstrate financial fitness. Please provide financial fitness documentation that may include two consecutive years of income tax filings, three consecutive months of bank statements, etc.
6. Reference Application, Section 7.e, Financial Fitness – Applicant failed to provide an e-mail address for their custodian of accounting records. Please provide an updated application page with the appropriate corrections.
7. Reference Application, Section 7.f, Taxation – Applicant failed to provide a Tax Certification Statement. Please submit a complete Tax Certification Statement.

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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.

NONE

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.

NONE

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

- 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.

NONE

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

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

N/A

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

Fees will be collected on a monthly basis from Suppliers that we are engaged with. We will reconcile the Supplier payment reports against our customer list to be sure commissions are correct.

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.

Bob Vodzak of Brandt Accounting - 18 S Main St, Manheim, PA 17545 (717) 665-2849
bobv@brandtaccounting.com phone: (717) 665-2849

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.



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

January 9, 2020

Mr. Jon Loercher, Owner/President
Honorable Energy LLC
210 W. High Street
Manheim, PA 17545
Email: jloercher@honorableenergy.com

RE: Security Requirement Bond for Honorable Energy LLC

Dear Mr. Loercher:

Philadelphia Gas Works ("PGW") is aware that Honorable Energy 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, Honorable Energy LLC must furnish acceptable security to each utility where Honorable Energy LLC will do business. As such, under its tariff, Philadelphia Gas Works could require Honorable Energy 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 Honorable Energy LLC intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services Honorable Energy LLC will never take title to any delivered natural gas.

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

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

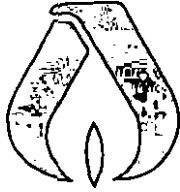
Sincerely,

A handwritten signature in black ink, appearing to read 'J. Zuk'.

JOHN ZUK

Sr. Vice President, Gas Management

/dls



VALLEY ENERGY

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

January 7, 2020

VIA EMAIL

Honorable Energy LLC
Jon Loercher, President
210 W. High St.
Manheim, PA 17545
jloercher@honorableenergy.com

Dear Mr. Loercher:

We understand that Honorable Energy 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 Honorable Energy LLC intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Honorable Energy 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 Honorable Energy LLC as deemed appropriate.

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

Sincerely,

Edward E. Rogers
President & CEO

EER/ss

cc: J. Levering, Valley Energy



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

January 7, 2020

Jon Loercher
President
Honorable Energy LLC
210 W High St
Manheim PA 17545

Dear Mr. Loercher:

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

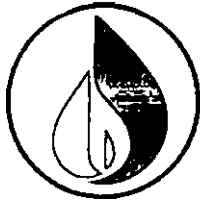
If a Pool is established, and customers are enrolled which alters the creditworthiness requirement or the Company’s exposure to Honorable Energy LLC provision of services on the Peoples’ system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

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



National Fuel

October 22, 2019

Jonathan E. Loercher, Owner/President
Honorable Energy LLC
210 West High Street
Manheim, PA 17543

Re: Honorable Energy LLC

Dear Jonathan,

National Fuel Gas Distribution Corporation ("NFGDC") is aware Honorable Energy LLC (HE) 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, HE must furnish acceptable security to each utility where HE will do business. As such, under its tariff, NFGDC could require HE 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 HE intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, HE will never take title to any delivered natural gas.

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

January 7, 2020

Jon Loercher
Honorable Energy
210 W High St
Manheim, PA 17545

Dear Jon Loercher:

We are pleased that Honorable Energy 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, Honorable Energy 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. Honorable Energy has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Honorable Energy 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 Honorable Energy changes in the future, Columbia Gas might deem it appropriate to require Honorable Energy to provide a bond or other financial security instrument.

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

Sincerely,

Kylia Davis

Kylia Davis
Manager of Choice and Transportation Support Services



An Exelon Company

January 22, 2020

Jon Loercher, President
Honorable Energy LLC
210 W. High Street
Manheim, PA 17545

Re: Broker Requirements

Dear Honorable Energy LLC:

PECO is aware that Honorable Energy 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, Honorable Energy LLC could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Honorable Energy 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 Honorable Energy 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 Honorable Energy LLC the creditworthiness requirement for PECO's exposure to Honorable Energy LLC changes in the future, PECO reserves the right to require Honorable Energy 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,

A handwritten signature in cursive script that reads "Carlos P. Thillet".

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



UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517
610-796-3400

VIA E-MAIL

January 7, 2020

Honorable Energy, LLC
210 W. High Street
Manheim, PA 17545

ATTENTION: Jon Loercher, President

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

Dear Mr. Loercher,

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

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

Sincerely,

A handwritten signature in cursive script that reads 'Sherry Epler'.

Sherry Epler
Senior Manager
Tariff & Supplier Administration

SE/rks