



1055 Virginia Drive, Suite 205  
Fort Washington, PA 19034  
610-955-2994  
[puleoenergy.com](http://puleoenergy.com)

Dear Secretary Chiavetta:

The Application for Leoco Financial LLC d/b/a Puleo Energy for approval to offer, render, furnish, or supply natural gas services as a broker/marketer was returned due to the entire filing being marked confidential. Please see original letter received with the returned Application stapled to this letter.

The confidential markings were removed from the Application and a new Application is attached for review.

Please note that the original copies for Appendix A, B, and C have the RECEIVED STAMP DATE from the original filing on February 3, 2020. It is my understanding that the Commonwealth would like original copies of these notarized items; hence, the RECEIVED STAMP DATE of February 3, 2020 on these items.

Furthermore, a copy of the notarized Legal Publication is included since the original copy is being filed with our Application to render, furnish, or supply electricity services as a broker/marketer.

RECEIVED  
FEB 20 2020  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Very Truly Yours,

A handwritten signature in black ink that reads 'Samuel M. Puleo, Jr.'  
Samuel M. Puleo, Jr.



1055 Virginia Drive, Suite 205  
Fort Washington, PA 19034  
610-955-2994  
[puleoenergy.com](http://puleoenergy.com)

Attention: Secretary Rosemary Chiavetta

Dear Secretary Chiavetta:

I am writing this letter in order to be fully transparent with you and the Public Utility Commission staff about my involvement with Coastal Energy Consultants LLC and a related federal criminal conviction. Although this conviction occurred in January 2014 and proceeds the 5-year period in section 5.a. of the application, I believe the right thing to do is to disclose this matter to you for the sake of honesty and integrity.


In January 2014, I pleaded guilty to 1 count of wire fraud related to my involvement with Coastal Energy Consultants. A copy of the indictment and a news article detailing my sentence are enclosed for your review.

After completing my sentence, I decided to attempt to re-start my career in the energy sector. Prior to doing so, I contacted Mr. Jeff McCracken of the Pennsylvania Public Utility Commission to disclose my conviction and to inquire about my options within the sector. I contacted Mr. McCracken in February 2015 and have been in periodic communication with him since to remain in full compliance with the law and PUC regulations. A timeline of this communication is enclosed for your review as well as copies of the email exchanges between Mr. McCracken and me.

Furthermore, to be forthright with all persons deciding to do business with me, I disclose my criminal history via my website. This information is also published to my LinkedIn profile page. A printed copy of the disclosure on the website and my LinkedIn profile page are enclosed for your review. You can also find this information at the following web addresses: [www.puleoenergy.com/about](http://www.puleoenergy.com/about) and [www.linkedin.com/in/sam-puleo-6331ab190](http://www.linkedin.com/in/sam-puleo-6331ab190). I have also included many customer reference letters as well as personal character reference letters for your review.

It is my intention to continue conducting business the way I have been as an exclusive sub-contractor of a licensed EGS/NGS broker, and my primary objective to obtain an EGS/NGS broker's license is to have the ability to market under my company name and brand of Puleo Energy. I hope that you and the members of the PUC staff will view my efforts to be forthright and transparent as an act of integrity. I learned the great life lesson of humility through my terrible decisions as a young man, and I am working hard to redeem myself and my reputation.

Thank you in advance for your time and consideration.

  
FEB 20 2020  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S OFFICE

Very Truly Yours,



Samuel M. Puleo, Jr.

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## Mr. Puleo's Disclosure



THE UNITED STATES ATTORNEY'S OFFICE  
EASTERN DISTRICT *of* PENNSYLVANIA

[U.S. Attorneys](#) » [Eastern District of Pennsylvania](#) » [News](#)

**Department of Justice**  
U.S. Attorney's Office  
Eastern District of Pennsylvania

FOR IMMEDIATE RELEASE

Wednesday, October 23, 2013

## Three Charged In Energy Pricing Scheme

Michael Mateja, 27, of Massachusetts, Matthew Morgan, 39, of Schnecksville, PA, and Samuel Puleo, 26, of Fogelsville, PA, are charged by Information, filed yesterday, with a fraud scheme involving energy contracts, announced United States Attorney Zane David Memeger. According to the information, Mateja and Puleo owned and operated Coastal Energy, LLC, a company that brokered energy contracts between commercial businesses and energy suppliers.

Between June 2011 and February 2013, Mateja and Puleo solicited clients whom they had sign contracts ("Fixed All-Inclusive") stating that Coastal would negotiate fixed rates for each kilowatt hour. Alternatively, an "Energy Only" contract provides the customer with a rate for kilowatt hours but does not include additional charges for transmission and capacity. According to the information, Mateja and Puleo altered contracts to change the terms from "Fixed All-Inclusive" to "Energy Only" without the clients' knowledge. The end result that that the total per kilowatt hour price that Coastal's clients had to pay were higher than the rates they agreed to pay. They are each charged with wire fraud. Mateja and Morgan are also charged with obstruction of justice for an alleged attempt to delete documents located on Coastal's computers.

If convicted, each defendant faces a maximum possible sentence of at least 20 years in prison, three years supervised release, \$250,000 fine, and a \$100 special assessment

The case was investigated by Federal Bureau of Investigation and is being prosecuted by Assistant United States Attorney David L. Axelrod.

[Click here to view the indictment](#)

UNITED STATES ATTORNEY'S OFFICE, EASTERN DISTRICT of PENNSYLVANIA  
Suite 1250, 615 Chestnut Street, Philadelphia, PA 19106  
PATTY HARTMAN, Media Contact, 215-861-8525

**Component(s):**  
[USAO - Pennsylvania, Eastern](#)

Updated December 15, 2014

# Lehigh County man gets prison in electricity rate bait-and-switch

By **Peter Hall, Of The Morning Call**

MAY 13, 2014

**S**amuel Puleo escaped a harsh prison sentence for his role in a bait-and-switch energy pricing scam that cost businesses across the country hundreds of thousands of dollars.

On Monday, U.S. District Judge Michael M. Baylson sentenced Puleo to 30 days in prison followed by six months of home confinement and three years of supervised release.

But the 26-year-old Fogelsville man must also repay \$818,000 to the companies that wound up with higher-than-expected electricity bills or paid fraudulently earned commissions as a result of the scheme he ran with two other men.

Puleo's attorney, Charles Peruto Jr., argued in a sentencing memo to the judge that his client was a passive accomplice in the fraud, although, he conceded, Puleo did nothing to stop it.

"His acquiescence in this scheme is most regrettable, especially in light of the fact the people he was trying to impress the most, his parents and his family, about his new-found success are the ones he disappointed the most," Peruto wrote.

Puleo pleaded guilty in January to aiding and abetting wire fraud, a charge that carried a maximum sentence of 20 years in prison.

However, given Puleo's lack of a criminal history, cooperation, acceptance of responsibility and effort to make restitution even before being ordered to do so, prosecutors argued for a sentence less than the 33 to 41 months recommended by federal sentencing guidelines.

According to court documents, Puleo worked for Coastal Energy Consultants LLC, an energy brokerage that purported to help businesses find energy suppliers with the most favorable rates for electricity. Coastal earned a commission when a client entered into a contract with a supplier.

Puleo and Michael Mateja of North Andover, Mass., held themselves out as co-owners of Coastal and employed Matthew Morgan of Lowhill Township. They opened an office in December 2011 in the 7500 block of Windsor Drive in Upper Macungie Township and closed about a year later, according to public records.

Federal prosecutors say Puleo and Mateja had their company's clients sign a limited power of attorney to allow Coastal to negotiate directly with suppliers. The agreement said Coastal would negotiate a "Fixed All-Inclusive"

rate for its clients that included a price for electricity per kilowatt-hour used, capacity and transmission charges, the three costs that make up an electric bill.

But after clients signed the contracts, Puleo and Mateja altered them to show the clients were agreeing to a fixed energy cost only, resulting in higher-than-expected capacity and transmission charges for the clients, court papers say.

As a result of the fraud, Coastal received commissions to which it was not entitled, court papers say.

"The fraud scheme did not work well," prosecutors said in a court filing. "Many of the customers immediately noticed their energy bills were much higher than what they believed they would be charged."

When Puleo and Mateja learned in 2012 that the FBI was investigating Coastal's energy rate contracts, Mateja ordered Morgan to erase data from the company's computer hard drives and servers, court documents said.

Mateja and Morgan, who were charged with aiding and abetting wire fraud and obstruction of justice, have also pleaded guilty. Mateja's sentencing is scheduled next month. Morgan's was scheduled Monday, but was postponed and no new date is set.

*[peter.hall@mcall.com](mailto:peter.hall@mcall.com)*

*610-820-6581*

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PA PUBLIC UTILITY COMMISSION  
FEB 20 2012  
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# Timeline of Communication with Mr. McCracken of the PA Public Utility Commission



## Timeline of Communication with Mr. McCracken



2/2/15

(A)

Mr. Puleo contacted Mr. McCracken via email to disclose his criminal conviction related to Coastal Energy Consultants LLC and to inquire about his options to sell third party supply contracts with his new entity, Apollo Energy Management Advisors LLC ("Apollo"). Mr. McCracken informed Mr. Puleo that he could operate if exclusive to a single licensed EGS/NGS broker. At this time, Mr. Puleo informed Mr. McCracken that Apollo would enter into an exclusive sub-contractor agreement with licensed broker, Global Vision Energy LLC.

6/3/15

(B)

Mr. Puleo contacted Mr. McCracken via email to inform Mr. McCracken that Apollo was terminating its agreement with Global Vision Energy LLC and entering into a new exclusive sub-contractor agreement with licensed broker, Frontline Power Solutions LLC. Copies of all of this documentation were submitted to Mr. McCracken, and he responded informing Mr. Puleo that since Apollo was still representing a single broker, he was in compliance with PUC law.

3/31/16

(C)

Mr. Puleo contacted Mr. McCracken via email to inform Mr. McCracken that he sold his shares of Apollo and would now be operating under the same, single licensed broker, Frontline Power Solutions LLC through his singularly-owned entity Leoco Financial LLC.

9/14/17

(D)

Mr. Puleo contacted Mr. McCracken via email to inform Mr. McCracken that his entity, Leoco Financial LLC, would be terminating its exclusive relationship with Frontline Power Solutions LLC and would be entering into a new exclusive sub-contractor agreement with licensed broker, My Energy Option LLC. A copy of this new agreement was provided to Mr. McCracken.

## Timeline of Communication with Mr. McCracken (continued)



12/26/18

(E)

Mr. Puleo contacted Mr. McCracken via email to inquire as to the regulations regarding EGS and NGS brokers. Mr. McCracken informed Mr. Puleo that his entity could be exclusive to one EGS broker and a separate NGS broker since the EGS and NGS licenses were separate. At this time, Mr. Puleo's entity remained exclusive to EGS broker, My Energy Option LLC, for electricity, and became exclusive to NGS broker, National Utilities Refund dba National Energy, for natural gas.

5/20/19

(F)

Mr. Puleo contacted Mr. McCracken via email to inform Mr. McCracken that his entity would be ending its agreement with EGS broker, My Energy Option LLC, and begin operating with EGS broker Inertia Resources Inc. Mr. Puleo informed Mr. McCracken that his entity would remain exclusive to NGS broker, National Utilities Refund LLC dba National Energy, for natural gas.

5/29/19

(F)

Mr. McCracken contacted Mr. Puleo via the phone and email to inform Mr. Puleo that his entity may operate for licensed EGS and NGS brokers exclusively; however, his entity must market under the name of said EGS/NGS broker.

Mr. Puleo was unaware of this last regulation dictated by Mr. McCracken, and immediately ceased to mention his entity's name when marketing to new customers. Old customers; however, were marketed to under Mr. Puleo's entity name prior to Mr. Puleo becoming aware of this rule. **It is because of this ruling that Mr. Puleo is seeking a EGS/NGS license for his entity.**

PA PUBLIC UTILITY COMMISSION  
SICILIA, PA

## Copies of Email Exchanges with Mr. McCracken of the PA Public Utility Commission

\*Please reference corresponding "letters" in timeline on  
previous page to each email exchange.

# RE: Confidential - Apollo Energy Management Advisors LLC

February 2, 2015 at 10:18 AM

From Jeff McCracken to 2 recipients



Hi Sam,

That is exactly correct, and good luck to you in your energy auditing business.

**From:** Samuel Puleo Jr. [mailto:sampuleo@me.com]  
**Sent:** Monday, February 02, 2015 11:57 AM  
**To:** McCracken, Jeffrey  
**Cc:** Andrew Ginsburg  
**Subject:** Re: Confidential - Apollo Energy Management Advisors LLC

Thank you for your quick response Jeff. I will assume, unless I hear otherwise from you, that I have clearance to proceed as described in my first email to you. I will use your email below as evidence of this.

Regards,

Sam Puleo, Jr.  
+1 610.955.2994

On Feb 2, 2015, at 11:21 AM, "McCracken, Jeffrey" <jmccracken@pa.gov> wrote:

Hi Sam,

After reading through all of this, I have to make a couple different points. Also, in the below email, this is applicable for both EGS and NGS, even though I only say EGS.

1. As it relates to the audits and refunds/errors, etc., this is not licensable activity from the PUC's point of view. You would be fine, even if you need to talk to 3<sup>rd</sup> parties as it relates solely to billing audits and refunds or errors.
2. As it relates to the referrals to Global Vision Energy, LLC, an agent for a single EGS can operate under the EGS's license, and the EGS is responsible for the acts and omissions of the agent. If Apollo Energy operates under some sort of agreement solely for Global Vision Energy as it relates to referrals, it would be covered. IF Apollo Energy every decides to offer referrals to any pother licensed EGS/NGS, then they would need to be licensed by the PUC at that time.

**From:** Samuel Puleo Jr. [mailto:sampuleo@me.com]  
**Sent:** Sunday, February 01, 2015 12:46 PM  
**To:** McCracken, Jeffrey  
**Cc:** Andrew Ginsburg  
**Subject:** Confidential - Apollo Energy Management Advisors LLC

This correspondence is confidential.

Dear Jeff:

A

My apologies for not getting this out to you last week. Per our conversation on 01/29/15, I have included a brief outline of the business model I would like to pursue, a summary of my background, and other pertinent information. Please call me at the contact number below should you have any questions. Thank you, Sam.

**Objective:** To register a new Pennsylvania entity, Apollo Energy Management Advisors LLC ("Apollo"), that would conduct utility audits on behalf of its commercial and industrial client base. In conducting a Utility Audit, Apollo would have its clients enter into a Utility Audit Service Agreement. The terms of this agreement state that the Utility Audit is conducted at no expense to the client. Should Apollo be successful in obtaining a refund from the utility for errors/overcharges, or from the state for sales tax overcharges, the client agrees to pay a percentage of that refund to Apollo after the client has received said refund. Should Apollo find permanent savings for the client, the client agrees to pay a percentage of those realized savings to Apollo for an agreed upon time period. A sample of the agreement Apollo will use is attached for your review. Minor changes to this agreement may be made from time to time.

**Background:** The shareholders and officers of Apollo would be as follows. I have also included a summary of my background for your legal team to take into consideration.

**Samuel M. Puleo Jr. - 50% shareholder and officer.** As discussed with you on the phone, I have a criminal history related to the energy business. On 1/27/14 I plead guilty in Federal Court (Eastern District of PA) to 1 count of the information: 18USC&&1343,1349, 2 - Wire fraud and aiding and abetting. This was related to my involvement with Coastal Energy Consultants LLC. I was sentenced on 05/12/2014 to 30 days imprisonment, 180 days of home confinement, 3 years of probation, and ordered to pay \$819,000 in restitution. I was not ordered to refrain from working in the energy sector/business. My Probation Officer is aware of my desire to establish myself in this industry. I could have him call you or your legal team should you desire.

**Andrew Ginsburg - 50% shareholder and officer.** Andrew is copied on this email and his phone number is 610-349-6644. Andrew is aware of my personal background would like to form Apollo with me. You are free to call him to discuss anything.

**Additional Info:** I have a standing relationship with the officers of Global Vision Energy LLC ("Global"). Global is a licensed broker by the PA PUC (license number A-2012-2322961). As an additional part of Apollo's business model, when conducting the utility audit, if we believe there to be a potential savings on the client's electric supply, we would like to be able to refer our clients to Global so Global can provide its services. Should any of our clients choose to enter into an agreement with Global or any of its vendors, we would like to be able to receive a referral fee from Global for those clients. It is stated clearly in the Utility Audit Service Agreement that Apollo is not a licensed broker and shall not represent itself as such. It is also disclosed to the client that should the client enter into an agreement with Global, Apollo reserves the right to receive a referral fee. Both officers of Global are aware of my personal background and would like to enter into this business relationship. You can speak to either of them as there contact information is as follows: Greg Allen 607-738-4859 or Doug Kemmerer 610-360-1300.

Thank you in advance for your time. I am looking forward to your feedback.

Very truly yours,

# RE: Confidential - Apollo Energy Management Advisors LLC

June 8, 2015 at 9:44 AM

From Jeff McCracken to 4 recipients



Hi Sam,

Since you are only operating for one licensed EGS/NGS, you still would not need a license. Thanks for keeping me in the loop on this.

**From:** Samuel Puleo Jr. [mailto:sampuleo@me.com]  
**Sent:** Wednesday, June 03, 2015 8:31 PM  
**To:** McCracken, Jeffrey  
**Cc:** Greg Allen; Andrew Ginsburg; Doug Kemmerer  
**Subject:** Re: Confidential - Apollo Energy Management Advisors LLC

Hi Jeff,

Per our last email exchange on 2/2/15, and in relation to the referral of energy supply business to a licensed EGS, Apollo had entered into an exclusive Agent Agreement with Global Vision Energy LLC on 3/26/15.

Both Douglas Kemmerer and Gregory Allen, the 50/50 members of Global Vision Energy LLC, have decided to join Apollo Energy Management Advisors LLC as 25% shareholders each. Due to a recent market opportunity, Apollo Energy Management Advisors LLC has terminated its agreement with Global Vision Energy LLC and entered into an exclusive agreement with Frontline Power Solutions LLC, a licensed EGS.

Apollo will use Frontline Power Solutions LLC exclusively for any electric and/or natural gas supply referral business per your instructions below. For your records I have attached the following documentation:

1. Apollo's termination letter to Global Vision Energy LLC
2. Global Vision Energy's release letter to Apollo
3. The new exclusive Agent Agreement between Apollo and Frontline Power Solutions LLC.

Thank you for your consideration. Please respond or call me at the number below should you have any questions.

Very truly yours,

Sam Puleo, Jr.

610-955-2994

On Feb 02, 2015, at 11:18 AM, "McCracken, Jeffrey" <jmccracken@pa.gov> wrote:

Hi Sam,

That is exactly correct, and good luck to you in your energy auditing business.

# Re: Confidential - Apollo Energy Management Advisors LLC



March 31, 2016 at 8:40 AM

From Sammy Puleo

To Jeff McCracken

Jeff,

As a follow up to our last communication below in June of 2015 regarding Apollo Energy Management Advisors LLC, I am reaching out to inform you that I sold my shares of Apollo back to the other shareholders on December 31, 2015 and am no longer an Officer, Director, or Shareholder of Apollo.

I am now operating as you directed through an exclusive marketing agreement with Frontline Power Solutions LLC (the licensed EGS/NGS). This agreement with Frontline is with my entity, Leoco Financial LLC.

I wanted you to have this on record for legal purposes. Thank you.

Sam Puleo

Tel: +1 610-955-2994

Fax: +1 800-743-1948

sampuleo@me.com

On Jun 8, 2015, at 1:43 PM, McCracken, Jeffrey <jmccracken@pa.gov> wrote:

Hi Sam,

Since you are only operating for one licensed EGS/NGS, you still would not need a license. Thanks for keeping me in the loop on this.

**From:** Samuel Puleo Jr. [mailto:sampuleo@me.com]  
**Sent:** Wednesday, June 03, 2015 8:31 PM  
**To:** McCracken, Jeffrey  
**Cc:** Greg Allen; Andrew Ginsburg; Doug Kemmerer  
**Subject:** Re: Confidential - Apollo Energy Management Advisors LLC

Hi Jeff,

Per our last email exchange on 2/2/15, and in relation to the referral of energy supply business to a licensed EGS, Apollo had entered into an exclusive Agent Agreement with Global Vision Energy LLC on 3/26/15.

Both Douglas Kemmerer and Gregory Allen, the 50/50 members of Global Vision Energy LLC, have decided to join Apollo Energy Management Advisors LLC as 25% shareholders each. Due to a recent market opportunity, Apollo Energy Management Advisors LLC has terminated its agreement with Global Vision Energy LLC and entered into an exclusive agreement with Frontline Power Solutions LLC, a licensed EGS.

Apollo will use Frontline Power Solutions LLC exclusively for any electric and/or natural gas supply referral business per your instructions below. For your records I have attached the following documentation:

## RE: Confidential: Question (2)

D

September 15, 2017 at 5:16 AM

From Jeff McCracken

To "Samuel Puleo Jr."

Hi Sam,

Thanks for the update. However, I must inform you that you are under no obligation to provide me information (like the contract that was attached) until you file an application to become a licensed EGS or NGS. As long as your companies only supply services to a single licensed EGS, you are covered by the sub-contractor clause of the law and not required to be licensed. If you do file a license to become an EGS or NGS, we would not need to see these contracts at that point, either, since you would be licensed and able to operate as you see fit.

However, if you do have questions now or in the future, you can continue to ask me.

**From:** Samuel Puleo Jr. [mailto:sampuleo@me.com]  
**Sent:** Thursday, September 14, 2017 8:28 PM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Subject:** Re: Confidential: Question (2)

Hello Jeff,

As promised attached is the executed sub-agent agreement between my entity, Leoco Financial LLC, and the licensed EGS, My Energy Option LLC (license # A-2017-2612022). As I stated in my previous email to you below on 8/14/17, I have been assisting with the operational structure of My Energy Option LLC and was waiting for them to receive their PUC license before executing a new sub-agent agreement.

I will cease offering referrals to the previous EGS to whom I was contracted and will begin offering referrals to My Energy Option LLC on an exclusive basis in order to comply with PUC regulation.

Please feel free to call me at the number below should you have any questions.

Very truly yours,

Sam Puleo Jr.

+1 610.955.2994

On Aug 15, 2017, at 04:50 AM, "McCracken, Jeffrey" <jmccracken@pa.gov> wrote:

Hi Sam,

So, in summary of below, you are going to have 2 different companies operating under the same EGS?

**From:** Sammy Puleo [mailto:sampuleo@me.com]  
**Sent:** Monday, August 14, 2017 9:17 PM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Subject:** Re: Confidential: Question (2)



**RE: [External] Re: Confidential: Question (2)**

December 26, 2018 at 5:20 AM

From Jeff McCracken

To Sammy Puleo



Hi Sam,

In Pennsylvania, the EGS and NGS licenses are completely separate. You may operate as a subcontractor under contract to one licensed EGS, and as a subcontractor under contract to one licensed NGS. The EGS and NGS supplier does not need to be the same entity.

Thanks.

**From:** Sammy Puleo <sampuleo@me.com>  
**Sent:** Thursday, December 20, 2018 1:50 PM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Subject:** [External] Re: Confidential: Question (2)

**ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to [CWOPA\\_SPAM@pa.gov](mailto:CWOPA_SPAM@pa.gov).

Hi Jeff,

Hope you are well. I have a follow up question to your response below. Per your instructions, my company is only providing services for a single licensed EGS through an exclusive sub-contractor agreement. Could my company provide gas services to a different licensed NGS through a similar agreement?

In other words, is it within PUC law to be exclusive to one EGS for electric and to a different NGS for gas?

Thanks,  
Sam

On Sep 15, 2017, at 9:15 AM, McCracken, Jeffrey <jmccracken@pa.gov> wrote:

Hi Sam,

Thanks for the update. However, I must inform you that you are under no obligation to provide me information (like the contract that was attached) until you file an application to become a licensed EGS or NGS. As long as your companies only supply services to a single licensed EGS, you are covered by the sub-contractor clause of the law and not required to be licensed. If you do file a license to become an EGS or NGS, we would not need to see these contracts at that point, either, since you would be licensed and able to operate as you see fit.

However, if you do have questions now or in the future, you can continue to ask me.

**From:** Samuel Puleo Jr. [mailto:sampuleo@me.com]  
**Sent:** Thursday, September 14, 2017 8:28 PM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Subject:** Re: Confidential: Question (2)

**RE: [External] Re: Confidential: Question (2)**

May 29, 2019 at 6:32 AM

From Jeff McCracken

To Sammy Puleo

Cc "Gill, Darren", "Backer, Debra"



Hi Sam,

*This email is a follow-up to our phone conversation.*

Companies may be subcontractors for Brokers as well as full Suppliers. The critical criteria is how you market for that entity. If you state your company's name when marketing for Inertia Resources, you would need a license. However, if you only state that you are calling on behalf of Inertia Resources and do **NOT** mention your own company's name, you would be covered as a subcontractor under Inertia.

I hope that clears it up for you. Feel free to call or email me if you have further questions.

Thanks.

**From:** Sammy Puleo <sampuleo@me.com>  
**Sent:** Tuesday, May 28, 2019 3:08 PM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Cc:** Gill, Darren <DGILL@pa.gov>; Backer, Debra <dbacker@pa.gov>  
**Subject:** Re: [External] Re: Confidential: Question (2)

Ok thank you. I have been operating as an exclusive sales contractor for a licensed EGS/NGS broker as we discussed dating back to 2015. I was under the impression per our emails and the section below on the EGS application, that this subcontractor rule applied for both true EGS/NGS suppliers and for EGS/NGS brokers. Looking forward to hearing back from you.

**• Subcontractors**

Any individual or commercial entity, such as a telemarketing firm, door-to-door salesman or company, or auction-type website, that provides marketing services to retail customers for electrical supply services **under contract to a single licensed EGS**, is not required to obtain an EGS license. However, any individual or commercial entity under contract to multiple EGS entities must obtain an EGS license.

On May 28, 2019, at 2:18 PM, McCracken, Jeffrey <jmccracken@pa.gov> wrote:

Hi Sammy,

Hold off on a license until I get back to you. We have a busy week, so it may be next week before I manage to talk to my Assistant Director.

**From:** Sammy Puleo <sampuleo@me.com>  
**Sent:** Tuesday, May 28, 2019 2:14 PM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Cc:** Gill, Darren <DGILL@pa.gov>; Backer, Debra <dbacker@pa.gov>  
**Subject:** Re: [External] Re: Confidential: Question (2)

Ok thank you.

On May 28, 2019, at 2:07 PM, McCracken, Jeffrey <jmccracken@pa.gov> wrote:

Hi Sammy,

The answer to your question is that you would need to get your own license.

**From:** Sammy Puleo <sampuleo@me.com>  
**Sent:** Tuesday, May 28, 2019 2:04 PM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Cc:** Gill, Darren <DGILL@pa.gov>; Backer, Debra <dbacker@pa.gov>  
**Subject:** Re: [External] Re: Confidential: Question (2)

Ok thank you for your response. What if my company is operating under a licensed broker, not supplier?

On May 28, 2019, at 2:02 PM, McCracken, Jeffrey <jmccracken@pa.gov> wrote:

Hi Sammy,

I spoke to our Law Bureau regarding your below email. If your company is not operating under contract to a full supplier (only), you will need to get licensed as a *broker/marketer*.

Thanks.

**From:** Sammy Puleo <sampuleo@me.com>  
**Sent:** Monday, May 20, 2019 10:33 AM  
**To:** McCracken, Jeffrey <jmccracken@pa.gov>  
**Subject:** Re: [External] Re: Confidential: Question (2)

Hi Jeff,

I know you stated in your previous email that I am under no obligation to provide you with this information, but I like having a written statement on file with the PUC to ensure compliance.

As of today's date, my company, LEOCO FINANCIAL LLC, is now exclusive for electricity sales to Inertia Resources (current EGS applicant and exclusive broker for ENGIE). I will currently only be offering the ENGIE product through Inertia Resources until their EGS license is approved. My company is also exclusive to National Utilities Refund (licensed NGS) for natural gas sales. As some of my customers are still under contract with my previous EGS, I am continuing to collect residual commissions, but have ceased processing new customers through my previous EGS.

Thank you.

F

FEB 24 2020  
PA PUBLIC SAFETY COMMISSION  
SECRETARY'S OFFICE

## Website + LinkedIn Disclosures

Next: Our Mission

## Our Story

### To Whom It May Concern:

If you are considering doing business with us, I would like to first disclose a few items to you.

My name is Sam Puleo, and I am the owner of Puleo Energy. I entered the energy business in 2010 by co-founding MSGE LLC. MSGE acted as a sales agent for a licensed electric gas supplier. In 2011, I co-founded Coastal Energy Consultants LLC, an energy brokerage firm. In 2012, the company began taking limited power of attorney on behalf of our large customers to lock-in energy prices at certain strike points in the market. In addition to the many accounts we transacted successfully, we did not handle the large customers' contracts properly. The strike prices were very low and we made a terrible mess of it. I only took work on the command by violation of the contract in order to close the deal and earn a commission. Because the POA did not authorize us to do this, we committed fraud. The judge found our practice created a higher energy cost for those customers. The customers were then in breach of their contracts by the energy supplier and a large liability was due for early termination fees. In addition to the customer overages, I was held fully indebted in late 2013 and ordered to pay \$50,000 in restitution. A copy of the article outlining the incident can be found <http://www.enr.com/story/2014/03/10/energy-supplier-issues-double-charged-energy-billing-errors>

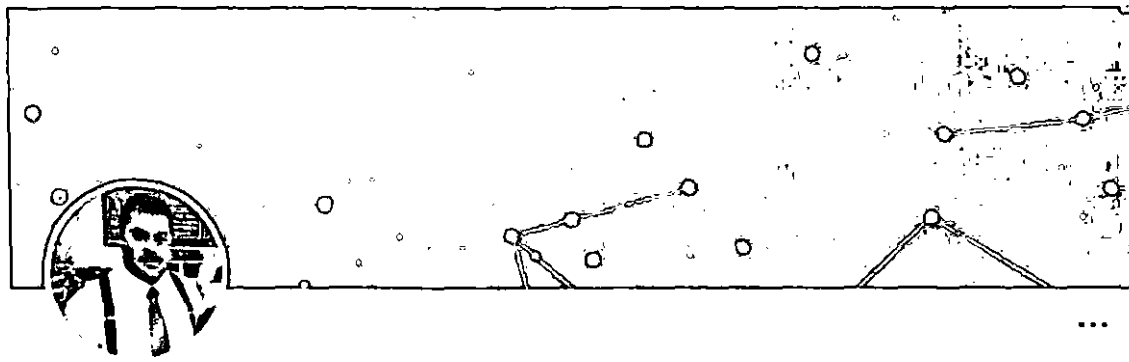
In 2013, the company entered into several unlicensed agreements with the Pennsylvania State Board of Energy. I am not a licensed energy supplier. The agreements were made without the proper licensing and since then we have successfully completed a number of transactions.

In 2014, I signed an agreement with the Pennsylvania State Board of Energy. I am not a licensed energy supplier. The agreement was made without the proper licensing and since then we have successfully completed a number of transactions.

Sincerely,

Sam Puleo  
Owner Puleo Energy

Website Disclosure: [www.puleoenergy.com/about](http://www.puleoenergy.com/about)



### Sam Puleo

Founder at Puleo Energy  
Philadelphia, Pennsylvania 65 connections

[Sign in to Connect](#)

Puleo Energy

### About

Hello, I'm Sam Puleo. I entered the energy business in 2010. In 2012, I made a terrible decision that led to an FBI investigation and federal indictment. I am currently re-building my career and reputation. It is important for you to know these details if we might do business together. For more information, please visit [www.puleoenergy.com/about](http://www.puleoenergy.com/about).

Puleo Energy provides electric power and natural gas commodity brokerage services.

### People also view

- Lloyd Dean**  
CEO at Commont
- Richard Edelm**  
President and CE
- Chris Nassetta**  
President and CE
- Tevin Moore**  
Intelligence Anal
- Duron Pitts**  
P&D Manager at
- Costley Hamil**  
Delivery Driver at
- Dustin Crowde**  
Delivery Driver at
- Tandra White**  
Package Handler
- Jeffrey Psujek**  
Delivery Driver at

LinkedIn Disclosure: [www.linkedin.com/in/sam-puleo-6331ab190](http://www.linkedin.com/in/sam-puleo-6331ab190)

FEB 20 2010

PA PUBLIC UTILITIES COMMISSION  
SERVICES DIVISION

## Customer References and Character Reference Letters

Joseph Gimaro  
Owner  
Quality Inn Hotel  
678 Bethlehem Pike  
Montgomeryville, PA 18936



To Whom It May Concern,

I met Sam Puleo of Puleo Energy in 2016 when he walked into my hotel making a cold call. I found Sam to be very forthright and honest. In fact, he disclosed his past legal issues in the energy business to me prior to us doing business together.

Due to Sam's transparency, I decided to give him a shot. He has been able to secure very low fixed rates for me and has done a terrific job watching the market for us. He comes to me when the market is low and we never miss an opportunity to lock in a lower renewal rate for the future.

Sam is a class act and I continually recommend him to my friends and business acquaintances who are looking for good energy companies.

Please feel free to contact me at the email below if you have any questions related to Sam, his character, or Puleo Energy.

Thank you,

Joseph Gimaro  
joejr@gimaro.net



George Jarrah  
Owner  
Ashley's Florist  
500 Hanover Ave  
Allentown, PA 18109



To Whom It May Concern,

I am the owner of Ashley's Florist and have been in business since 2001. I have known Sam Puleo since 2010 when he first entered the energy business. Sam has helped me secure better energy pricing at my florist shop for many years.

Sam has been a business associate and friend for many years. I watched him go through his legal battles and face his problems like a real man. I respect Sam and will continue doing business with him as long as I am in business.

I refer Sam to many of my friends who own businesses and invite you to contact me at the email below if you have any questions.

Thank you,

George Jarrah  
gjarrah@aol.com

Donna Ewanciw  
Owner  
Vela Restaurant  
140 Veterans Lane  
Doylestown, PA 18901



To Whom It May Concern,

I am the owner and head chef at Vela in Doylestown, PA. I have known Sam Puleo since 2015 and have been doing business with him since 2018.

When I first met Sam he was starting his second energy business, and he needed a part time job to fund his business. He applied to work for me at one of my restaurants. Sam was very upfront about his past legal issues in the interview and I decided to hire him. Sam proved to be an excellent worker and role model for other employees. We developed a strong business relationship and I always supported his vision of building his energy business.

I had a trusted energy salesman for many years, but decided to give Sam a chance in 2018. We signed an electric supply contract with Sam, but he recommended me staying with my original salesperson for gas due to the rate offer.

This gesture shows a lot about Sam's character and integrity. I highly recommend him and Puleo Energy to anyone. Please email me if you have any questions.

Thank you,

Donna Ewanciw  
772dje@gmail.com

John Fisher  
Owner  
Baby Blues BBQ Philadelphia  
3402 Sansom Street  
Philadelphia, PA 19104



To Whom It May Concern,

I own a bar-b-que restaurant in Philadelphia and have been doing business with Sam of Puleo Energy since 2011. They have been helping me manage my third party electricity and natural gas supply contracts.

We have renewed 5 electricity supply contracts and 2 natural gas supply contracts with various suppliers that Puleo Energy felt had the best rates and terms. We left our gas with PGW for many years since Puleo recommended the utility rates to be better than any third party rate at the time.

We have saved thousands of dollars since doing business with Puleo and continue to save money contract-over-contract. The company and its people are very professional, knowledgeable, and diligent.

I highly recommend Puleo Energy to any business owner looking to take advantage of energy deregulation. Please feel free to email me if you have any questions.

Sincerely,

John Fisher  
[johnny@babybluesbbq.com](mailto:johnny@babybluesbbq.com)

Steve Smith  
COO–Pizzazz Fitness Management II  
DBA: Planet Fitness  
511 Germantown Pike  
Lafayette Hill, PA 19444



To Whom It May Concern,

As COO/owner of our franchise group, we own several clubs (16) throughout 3 US states. In 2011, I met Sam Puleo and started doing business with him. We have been doing business together ever since.

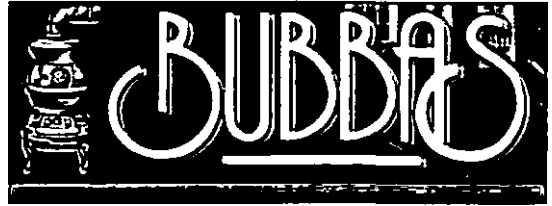
Sam has been extremely conscientious in helping us manage our electric and natural gas supply contracts at our gyms. He is very transparent in his price offerings and has educated us on how the energy markets work so we can make educated decisions.

We have saved thousands of dollars on our utility bills since working with Sam and I highly recommend him to anyone. Please feel free to email me at the email address below if you have any questions.

Thank you,

Stephen Smith  
steve@pplanetfitness.com

Basem Jarrah  
Owner  
Bubba's Potbelly Stove  
1485 N West End Blvd  
Quakertown, PA 18951



To Whom It May Concern,

I am the owner of Bubba's Potbelly Stove and have been doing business with Sam Puleo of Puleo Energy since 2016 at Bubba's and other restaurants I have owned.

In 2017 at one of my restaurants, I noticed a very high PECO bill. Sam sold me the electric contract, so I called him. He came in person to my restaurant the same day to look at my bill. He noticed the high charge was due to my natural gas usage, but we were not operating any differently than the prior years. Sam called PECO and had a representative come check the gas meter. It turned out the meter was double reading our usage and he was able to secure me a \$16,000 credit from PECO.

Sam knows more about energy than anyone I know. He is on top of his game and will help you with all things, even if they are unrelated to what he sold you.

Sincerely,

Basem Jarrah  
mjarrah78@gmail.com

Doug Kemmerer  
President  
Corporate Limousine  
852 Trexlertown Road  
Breinigsville, PA 18031



To Whom It May Concern,

I am the President of Corporate Limousine, a limousine company in Pennsylvania. I am also a partner at Global Vision Energy LLC, a licensed energy brokerage with the Pennsylvania Public Utilities Commission.

I met Sam Puleo in 2010 and started doing business with him in the energy sector. Several years into our relationship, one Global Vision Energy's customers signed a contract with Sam's company, Coastal Energy that was altered by his company causing our customer financial damages. At the time, I was very upset with both Sam and others at his company; however, I have watched Sam change and rise to the occasion to rectify the matter.

I continued to observe Sam display integrity through the entire situation. I admire the man Sam has become and trust him personally and in business. Throughout this process, I have become a mentor to Sam and gained a lot of respect for him. Ironically, I can honestly say that I too have been learning from him.

Please feel free to contact me directly with any questions.

Thank you,

Doug Kemmerer  
dkemmerer@corporatelimousine.com



Vince DiMaio  
Managing Partner  
National Utilities Refund LLC  
dba National Energy  
1717 Main Street  
Northampton, PA 18067

To Whom It May Concern,

I am the owner of National Utilities Refund LLC dba National Energy. We are a licensed electric broker and natural gas broker with the Pennsylvania Public Utilities Commission, and several other Utilities Commissions in different states throughout the U.S. We also operate a national utility bill auditing firm.

I have known Sam Puleo since 2007 and have been working with Sam in the energy sector since December of 2018. Sam has been acting as a sales sub-contractor for my company. Sam has been straightforward and trustworthy in his dealings with us and his clients' contracts have all transacted successfully.

I value my relationship with Sam. Please email me with any questions.

Thank you,

Vince DiMaio  
vince@nationalutilityltd.com

# COMFORT PROFIT CONSULTING, INC

August 20, 2015

To Whom It May Concern:

My name is Dan Comfort and I am the president of Comfort Profit Consulting, Inc. I met Sam Puleo in 2011. I worked with Sam and his group extensively; I had agents and sub-agents submitting business to Coastal for bill auditing and evaluation.

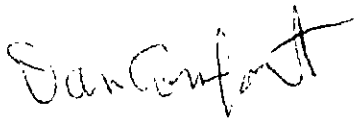
It was at this time that one of my accounts I had submitted was not properly processed. Sam was facing legal problems as well as a crisis of trust. However, he stepped up and faced his problems. He took responsibility. He paid my client out of his own pocket to fix the issues caused by his mistake.

Everyone makes mistakes; the true test of a person is how they address their mistakes. Sam went to great lengths to fix the issues caused by his error. He has been very transparent and speaks freely of what happened, not trying to gloss over or cover what happened.

It is for these reasons I can recommend Sam both on a personal and business level. I currently am doing business with Sam on a regular basis and I'm confident in recommending him to anyone considering the same.

Please call me with any questions.

Sincerely,



Dan Comfort

ELECTRIC \* TELECOM \* UTILITIES \* DATA \* TAX BENEFIT ANALYSIS

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**1-800-807-0922**



# CLEANITSUPPLY.COM

CleanItSupply.com  
705 General Washington Avenue  
Suite 703  
Jeffersonville, PA 19403  
800-998-3295

August 18, 2015

To Whom It May Concern:

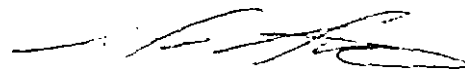
My name is Dan Dillon and I am the President of CleanItSupply.com. I have known Sam Puleo since 2012 when he owned Coastal Energy Consultants. My friend was considering working with Sam, and he asked me to evaluate his business. In meeting Sam for the first time, I saw his entrepreneurial spirit and charisma. He had the persistence that it takes to succeed in life, and I was very impressed with his attitude at a young age.

A few years later Sam made a bad choice and encountered serious legal issues related to his business. I have seen many similar situations being in business my entire life, and there seems to be two types of people: those with a truly bad-nature who never learn from their mistakes and end up ruining their lives, and those with good character who make a mistake, right their wrongs, and become better people. I experienced Sam become the second person. Not only did he own-up to his mistake, but he became an exceptional man by working hard to fix his problem.

As a lifelong business owner myself, I understand the many failures one experiences on the path to success. There is no doubt in my mind that Sam will be a very successful businessman. He will look back on this situation as the turning point on his journey to success.

I would highly recommend Sam to anyone I know and trust. Please call me directly if you would like to speak with me in person regarding Sam's character.

Sincerely,



Daniel Dillon  
President  
CleanItSupply.com

 CLEANITSUPPLY.COM



To Whom It May Concern:

My name is Thomas Grimes and I am the Chief Operating Officer of Calex ISCS, Inc. I met Sam Puleo in 2014 when he made a cold call to our business attempting to secure an appointment with the intent on selling our company tractors. From the moment I met Sam he impressed me being full of ambition, drive and determination to make a deal. As a long time businessman myself, I saw in Sam what I had at a young age – a drive for success and a passion to win. He was truly on the road to success.

A few years later, I came to understand of Sam's legal issues related to his energy business. The business fell apart and he was facing serious legal troubles. In business, problems happen. It is not the problem, but how you react to it. What impressed me the most is how Sam handled his problem. He addressed his situation straight on and took personal responsibility. It was not easy, but he did the right thing. Most people at his age if faced with a similar problem would not make the right decisions. He still has a long road ahead of him in terms of righting all of his problems, but I admire the man Sam has become in the process. He is mature, centered, and empathetic. It is rare to find someone his age with so much character.

Our business does \$75 million per year, and I would trust Sam with it and my customers. He is a class act. Please feel free to contact me at any time if you would like me to elaborate any further.

Regards,

A handwritten signature in black ink, appearing to read "Thomas J. Grimes", with a long, sweeping flourish extending to the right.

Thomas J Grimes  
Chief Operating Officer

---

58 PITTSTON AVENUE

PITTSTON, PA 18640-3725

Corporate Office: (570)603-0180 Fax: (570)603-0940

Women's Business Enterprise  
National Council





To Whom It May Concern:

My name is Robert Knapp and I am the Director of Lease and Rental for Vanguard Truck Centers. I met Sam Puleo in 2012 when I was General Manager of Hunter Peterbilt in Allentown, and hired him shortly thereafter. When I met Sam he was only 24 years old, but seemed to have the wisdom and business acumen of somebody well beyond his years. Most of our customers noticed the same and he proved to develop many successful business relationships.

I found him to be very honest, trustworthy and dependable. He was a valuable, key member of my team while we worked together and I find him to be someone you can trust and count on both professionally and personally. He is a great communicator, highly intellectual and has a great work ethic. He is also willing to do what it takes to be successful and is not afraid to roll his sleeves up or work long hours to get things done.

Sam has an entrepreneurial spirit and a passion for success. He comes from a great family with a long line of successes, is extremely professional and has class.

I would trust Sam as future employee or business partner and wish him all the best.

I know he has what it takes to be successful.

Very truly yours,

A handwritten signature in black ink, appearing to be "Bob Knapp", written in a cursive style.

Bob Knapp  
Director Lease and Rental  
Vanguard Truck Centers  
Cell: 404-430-6075  
bob.knapp@vanguardtrucks.com  
www.vanguardtrucks.com



September 28, 2015

To Whom It May Concern:

My name is Matt Kress and I'm the Domestic Sales Manager at Mack Defense. I met Sam Puleo in 2013 when we both worked together at Hunter Peterbilt in Allentown, Pennsylvania. Sam is one of the best salesman with whom I have ever had the opportunity to work. He is a hard worker and cares about his customers. Sam is the kind of guy who always has a smile on his face - a team player who I could always count on.

I came to learn about Sam's issue with Coastal Energy Consultants when we were working together at Peterbilt. I was extremely impressed with how Sam took responsibility for his actions, and never hid from the past. We all make mistakes in life, but it takes a true man to stand up and do right by his mistakes. That's exactly what I have seen Sam do.

I think Sam is a great guy. He is someone I hold in high regards and trust. I recommend Sam as a business partner and would jump at the opportunity to use his expertise to better my company.

Sincerely,

Matt Kress  
Domestic Sales Manager

**Mack Defense, LLC**  
7310 Tilghman St. Suite 600  
Allentown, PA 18106  
484-387-5924 Office  
484-632-9107 Mobile  
610-395-3240 Fax  
matt.kress@mackdefense.com

To Whom It May Concern:

My name is Rich Lesmeister and I have been a close friend to Sam Puleo since 2007.

Over the years, Sam has taken the time to personally guide and teach me in my career. He has been a personal mentor as well as someone I look up to.

Furthermore, I saw Sam's rise to success in his career at a young age and watched him through his failure and terrible mistakes. Most significantly, I saw the growth of his character and core principles, which were led by a necessity to take responsibility. As of late, I have seen him become stronger than ever as he has taken his experience into building a business with a strong foundation in honesty, personal responsibility, and integrity. Sam not only displays these qualities in his business with clients, but also in personal relationships as well.

I trust Sam and see him as a man of great integrity. Please contact me directly if you have any questions about Sam's character.

Sincerely,

Rich Lesmeister

Rlesmeister90@gmail.com

1/26/2020

FEB 20 2020  
PA PUBLIC UTILITIES COMMISSION  
SECRETARY'S OFFICE

**Pennsylvania PUC NGS Application**

**for**

**Leoco Financial LLC dba Puleo Energy**

Application of **LEOCO FINANCIAL LLC, d/b/a PULEO ENERGY**, 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).

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:

**LEOCO FINANCIAL LLC d/b/a PULEO ENERGY**  
**1055 VIRGINIA DRIVE SUITE 205**  
**FORT WASHINGTON, PA 19034**  
**WWW.PULEOENERGY.COM**  
**610-955-2994 (PHONE)**

- 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.

**N/A. THE APPLICANT HAS A PHYSICAL LOCATION WITHIN THE COMMONWEALTH.**

- 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.

**SAMUEL M. PULEO, JR.**  
**PRESIDENT**  
**1055 VIRGINIA DRIVE SUITE 205**  
**FORT WASHINGTON, PA 19034**  
**610-955-2994 (PHONE)**  
**267-405-8668 (FAX)**  
**SAM.PULEO@PULEOENERGY.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.

**CHRISTOPHER P. FIORE, ESQ**  
**418 MAIN STREET, SUITE 100**  
**HARLEYSVILLE, PA 19438**  
**215-256-0205 (PHONE)**  
**215-256-9205 (FAX)**  
**CFIORE@FIOREBARBER.COM**

FPC 9.0.1

PA PUC

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

**(1) PRIMARY**  
**SAMUEL M. PULEO, JR.**  
**PRESIDENT**  
**1055 VIRGINIA DRIVE SUITE 205**  
**FORT WASHINGTON, PA 19034**  
**610-955-2994 (PHONE)**  
**267-405-8668 (FAX)**  
**SAM.PULEO@PULEOENERGY.COM**

**(2) SECONDARY**  
**THERESA M. PULEO**  
**SERVICE MANAGER**  
**1055 VIRGINIA DRIVE SUITE 205**  
**FORT WASHINGTON, PA 19034**  
**610-955-2994 (PHONE)**  
**267-405-8668 (FAX)**  
**TERRY.PULEO@PULEOENERGY.COM**

**2. BUSINESS ENTITY FILINGS AND REGISTRATION**

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as ("d/b/a")

Provide a copy of the Applicant's filing with Pennsylvania's Department of State Pursuant to 54 Pa. C.S. §311.

**THE APPLICANT WILL BE USING THE FICTITIOUS NAME OF "PULEO ENERGY". A COPY OF THE APPLICANT'S FILING FOR THIS NAME IS ATTACHED. PLEASE SEE APPLICATION ATTACHMENT A.**

**Or**

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**  
*(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)*

The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.



Or

The Applicant is a:

- domestic general partnership (\*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- \* If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

or

The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
- Give name and address of officers.

**PLEASE SEE APPLICATION ATTACHMENT B and APPLICATION ADDENDUM SECTION 2.B.**

### **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.

**N/A. THE APPLICANT HAS NO AFFILIATES.**

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.

**N/A. THE APPLICANT HAS NO 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 a 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)

**PLEASE SEE ATTACHED APPLICATION ADDENDUM SECTION 4.A.**

**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):

**PLEASE SEE ATTACHED APPLICATION ADDENDUM SECTION 4.B.**

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

**PLEASE SEE ATTACHED APPLICATION ADDENDUM SECTION 4.C.**

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 checked="" type="checkbox"/> Philadelphia Gas Works |
| <input checked="" 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 type="checkbox"/> All of the above                  |

**PLEASE SEE ATTACHED APPLICATION ATTACHMENT C.**

e. **CUSTOMERS:** Applicant proposes to provide services to:

- |                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | Residential Customers  |
| <input checked="" type="checkbox"/> | Small Commercial Customers - (Less than 6,000 Mcf annually)  |
| <input type="checkbox"/>            | Residential and Small Commercial as Mixed Meter <u>ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)</u> |
| <input checked="" type="checkbox"/> | Large Commercial Customers - (6,000 Mcf or more annually)  |
| <input checked="" type="checkbox"/> | Industrial Customers   |
| <input type="checkbox"/>            | Governmental Customers   |
| <input type="checkbox"/>            | All of above (Except Mixed Meter)  |
| <input type="checkbox"/>            | Other (Describe):  |

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

**THE APPLICANT WILL CONTINUE MARKETING WITHIN THE COMMONWEALTH UNDER THE METHOD DESCRIBED HEREIN IN THE "APPLICANT'S PRESENT OPERATIONS" SECTION OF THIS APPLICATION. THE APPLICANT WILL BEGIN MARKETING UNDER ITS LEGAL AND TRADE NAME UPON LICENSURE APPROVAL BY THE COMMONWEALTH.**

## 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.

NEITHER THE APPLICANT, AFFILIATE, PREDECESSOR OF EITHER, NOR PERSON IDENTIFIED IN THIS APPLICATION HAS BEEN OR IS CURRENTLY THE DEFENDANT OF A CRIMINAL OR CIVIL PROCEEDING WITHIN THE LAST FIVE (5) YEARS.

IN A GOOD FAITH EFFORT, AND IN AN ATTEMPT TO BE FORTHRIGHT AND HONEST WITH THE COMMONWEALTH, THE APPLICANT WISHES TO DISCLOSE A CRIMINAL PRECEDING RELATED TO A PERSON IDENTIFIED IN THIS APPLICATION DATING PRIOR TO THE FIVE (5) YEAR TERM REQUIRED BY THIS APPLICATION.

PLEASE SEE THE ATTACHED ADDENDUM FOR FURTHER INFORMATION.

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

PLEASE SEE ATTACHED ADDENDUM LABLED 'MR. PULEO'S DISCLOSURE'.

- 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.

N/A. NEITHER THE APPLICANT, AFFILIATE, PREDECESSOR OF EITHER, NOR PERSON IDENTIFIED IN THIS APPLICATION HAS HAD ANY FORMAL, ESCALATED ACTIONS, OR COMPLAINTS FILED BY A CUSTOMER, REGULATORY AGENCY, OR PROSECUTORY AGENCY WITHIN THE LAST FIVE (5) YEARS.

FURTHERMORE, NEITHER THE APPLICANT, AFFILIATE, PREDECESSOR OF EITHER, NOR PERSON IDENTIFIED IN THIS APPLICATION HAS HAD A PENNSYLVANIA PUC EGS OR NGS LICENSE PREVIOUSLY CANCELLED BY THE COMMISSION.

- 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

Department of Revenue  
Bureau of Compliance  
PO Box 281230  
Harrisburg, PA 17128-1230

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.

### THE APPLICANT IS PROPOSING TO DO BUSINESS IN THE PECO AND PHILADELPHIA GAS WORKS TERRITORIES.

#### **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](mailto:carlos.thillet@exeloncorp.com)

#### **Philadelphia Gas Works**

Ryan Reeves, Director Supply Transportation & Control  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
PH: 215.787.5103  
email: [pgwchoicesupply@pgworks.com](mailto:pgwchoicesupply@pgworks.com)

## 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.

**PLEASE SEE NGDC LETTERS IN APPLICATION ATTACHMENT D.**

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

**PLEASE SEE APPLICATION ATTACHMENT E.**

- 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. APPLICANT WILL BE OPERATING AS A BROKER/MARKETER ONLY.**

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

**PLEASE SEE APPLICATION ADDENDUM SECTION 7.D.**

- 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.

**KATHY MCCUSKER, CPA**  
**MCCUSKER ASSOCIATES**  
**540 PENNSYLVANIA AVE, SUITE 307**  
**FORT WASHINGTON, PA 19034**  
**215-643-0100 (PHONE)**  
**215-643-0103 (FAX)**  
**KMCCUSKER@MCCUSKERCPA.COM**

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

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

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

**PLEASE SEE ATTACHED.**

## **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.
- 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.

**PLEASE SEE ATTACHED APPLICATION ADDENDUM SECTION 8.A.**

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

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

**PLEASE SEE ATTACHED APPLICATION ADDENDUM SECTION 8.B.**

**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.

**NOT APPLICABLE.**

**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.

**PLEASE SEE ATTACHED APPLICATION ADDENDUM SECTION 8.D.**

**e. OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience.

**PLEASE SEE ATTACHED APPLICATION ADDENDUM SECTION 8.E.**



**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 THE APPLICANT IS APPLYING 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 30<sup>th</sup> following the end of the calendar year per 52 Pa. Code § 62.110.

AGREED

- c. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. § 2208(d). Transferee will be required to file the appropriate licensing application.

AGREED

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

ACKNOWLEDGED

- e. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 62.105.



AGREED

- f. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.



AGREED

- g. **NOTIFICATION OF CHANGE:** If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.



AGREED

- h. **CEASING OF OPERATIONS:** Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.



AGREED

- i. **FILING FEE:** The Applicant has enclosed or paid the required, non-refundable filing fee by CERTIFIED CHECK OR MONEY ORDER in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. The Commission does not accept corporate or personal checks for filing fees.



PAYMENT ENCLOSED

## 11. AFFIDAVITS

(All affidavits must be notarized before filing.)

- a.) **APPLICATION AFFIDAVIT:** Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.

PLEASE SEE ATTACHED.

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

PLEASE SEE ATTACHED.

## 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.


**SINCE THE APPLICANT IS ONLY PROPOSING TO DO BUSINESS IN PECO AND PHILADELPHIA GAS WORKS, THE APPLICANT PUBLISHED A NEWSPAPER ADVERTISEMENT IN THE PHILADELPHIA DAILY NEWS. PLEASE SEE COPY OF THE NOTARIZED ARTICLE ATTACHED. THE ORIGINAL WAS FILED WITH THE APPLICANT'S EGS APPLICATION.**

	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			
<b>PECO</b>			X				
Peoples - Equitable	X			X			
Peoples Natural Gas	X			X			X
Peoples Gas Company				X			
<b>Philadelphia Gas Works</b>			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: **LEOCO FINANCIAL LLC d/b/a PULEO ENERGY**

By: 

Title: **SAMUEL M. PULEO, JR. - PRESIDENT**

### 14. CHECKLIST

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections is complete.

**Applicant: LEOCO FINANCIAL LLC d/b/a PULEO ENERGY**

*Samuel M. Puleo*

<input checked="" type="checkbox"/>	<b>Signature</b>	
<input checked="" type="checkbox"/>	<b>Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)</b>	
<input checked="" type="checkbox"/>	<b>Application Affidavit</b>	
<input checked="" type="checkbox"/>	<b>Operations Affidavit</b>	
<input checked="" type="checkbox"/>	<b>Proof of Publication</b>	
<input checked="" type="checkbox"/>	<b>Tax Certification Statement</b>	
<input checked="" type="checkbox"/>	<b>Commonwealth Department of State Verification</b>	
<input checked="" type="checkbox"/>	<b>Certificate of Service</b>	

Applicant's Use

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

RECEIVED

FEB 03 2020

[Commonwealth/State] of PENNSYLVANIA:

ss.

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

County of MONTGOMERY

SAMUEL M. PULEO, JR., Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the PRESIDENT (Office of Affiant) of LEOCO FINANCIAL LLC d/b/a PULEO ENERGY (Name of Applicant)]

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

That the Applicant herein LEOCO FINANCIAL LLC d/b/a PULEO ENERGY has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas generation supplier pursuant to 66 Pa. C.S. § 2809 (B).

That the Applicant herein LEOCO FINANCIAL LLC d/b/a PULEO ENERGY has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein LEOCO FINANCIAL LLC d/b/a PULEO ENERGY 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 LEOCO FINANCIAL LLC d/b/a PULEO ENERGY 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.

Samuel M. Puleo, Jr.  
Signature of Affiant

Sworn and subscribed before me this 31 day of January, 2020.

Karin Christiansen  
Signature of official administering oath

My commission expires January 22, 2022

Commonwealth of Pennsylvania - Notary Seal  
KARIN CHRISTIANSEN - Notary Public  
Montgomery County  
My Commission Expires Jan 22, 2022  
Commission Number 1324332

FEB 03 2020

Appendix B

OPERATIONS AFFIDAVIT

FD-900 (200)

PA. PUBLIC UTILITY COMMISSION  
STATE OF PENNSYLVANIA

[Commonwealth/State] of PENNSYLVANIA:

: ss.

County of MONTGOMERY :

**SAMUEL M. PULEO, JR.**, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the **PRESIDENT** (Office of Affiant) of LEOCO FINANCIAL LLC d/b/a PULEO ENERGY (Name of Applicant);]

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

That LEOCO FINANCIAL LLC d/b/a PULEO ENERGY, 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 LEOCO FINANCIAL LLC d/b/a PULEO ENERGY, 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 LEOCO FINANCIAL LLC d/b/a PULEO ENERGY, 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 28 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 Gross Receipts and power 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).

As provided by 66 Pa. C.S. §2810 (C)(6)(iv), Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That **LEOCO FINANCIAL LLC d/b/a PULEO ENERGY**, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506, §2807 (C), §2807(D)(2), §2809(B) 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 Bureau of Public Liaison or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

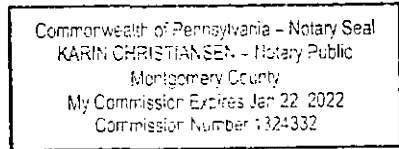
That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.

*Samuel M. Puleo*  
Signature of Affiant

Sworn and subscribed before me this 31 day of January, 2020.

*Karin Christiansen*  
Signature of official administering oath

My commission expires January 22, 2022.



**Appendix C**

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

**Example  
CERTIFICATE OF SERVICE**

On this the 31<sup>ST</sup> day of JANUARY 2020, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as an Natural Gas Generation 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:

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

Office of the Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120

Office of Consumer Advocate  
5th Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
P.O. Box 281230  
Harrisburg, PA 17128-0946

Small Business Advocate  
Commerce Building, Suite 202  
300 North Second Street  
Harrisburg, PA 17101

PECO  
Carlos Thillet, Manager Gas Supply  
2301 Market Street  
Philadelphia, PA 19103

Philadelphia Gas Works  
Ryan Reeves, Director Supply  
800 West Montgomery Ave  
Philadelphia, PA 19122

FEB 10 2020  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

~~RECEIVED~~

~~FEB 03 2020~~

~~PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU~~

*Samuel M. Puleo, Jr.*  
**SAMUEL M. PULEO, JR.**  
**PRESIDENT**  
**LEOCO FINANCIAL LLC d/b/a PULEO ENERGY**

*Karin Christiansen 01/31/2020*

Commonwealth of Pennsylvania - Notary Seal  
KARIN CHRISTIANSEN - Notary Public  
Montgomery County  
My Commission Expires Jan 22, 2022  
Commission Number 1324332



FEB 20 2010  
PAPERS DIVISION  
SECRET

# Application Attachments

FEB 9 2011  
PAPU  
SIGN

# Application Attachment A Fictitious Name Filings

ATTACHMENT A

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS  
401 NORTH STREET, ROOM 206  
P.O. BOX 8722  
HARRISBURG, PA 17105-8722  
[WWW.CORPORATIONS.PA.GOV](http://WWW.CORPORATIONS.PA.GOV)

Samuel Puleo  
604 Penllyn Pike  
Penllyn PA 19422

Puleo Energy

THE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS IS HAPPY TO SEND YOUR FILED DOCUMENT. THE BUREAU IS HERE TO SERVE YOU AND WE WOULD LIKE TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE BUREAU, PLEASE VISIT OUR WEBSITE AT [www.dos.pa.gov/BusinessCharities](http://www.dos.pa.gov/BusinessCharities) OR YOU MAY CONTACT US BY TELEPHONE AT (717)787-1057. INFORMATION REGARDING BUSINESS AND UCC FILINGS CAN BE FOUND ON OUR SEARCHABLE DATABASE AT [www.corporations.pa.gov/Search/CorpSearch](http://www.corporations.pa.gov/Search/CorpSearch) .

ENTITY NUMBER : 4192432

ATTACHMENT A

Entity# : 4192432  
Date Filed : 12/10/2018  
Pennsylvania Department of State

PENNSYLVANIA DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

Fictitious Name Amendment, Withdrawal, Cancellation  
(54 Pa.C.S.)

- Amendment (§ 312)
- Withdrawal (§ 313)
- Cancellation (§ 313)

Name		
Samuel Michael Puleo		
Address		
604 Penllyn Pike,		
City	State	Zip Code
Penllyn	PA	19422

Document will be returned to the name and address you enter to the left.

Fee: \$70.00

In compliance with the requirements of 54 Pa.C.S. Ch.3 (relating to fictitious names), the undersigned entity or entities, desiring to amend, withdraw or cancel from a fictitious name registration, hereby state(s) that:

1. The fictitious name is:  
My Power Option

2. The address of the principal place of business, including number and street, if any, is (the Department is authorized to conform to the records of the Department):

604 Penllyn Pike,	Penllyn	PA	19422	Lehigh
Number and street	City	State	Zip	County

3. The last preceding filing with respect to this fictitious name was made in the Department on 10/15/2018 (Date at) (Roll and Film)

4. A brief statement of the character or nature of the business or other activity to be carried on under or through the fictitious name is:  
energy brokerage

**ATTACHMENT A**

DSCB: 54-312/313-2

5. Check one or more of the following, as appropriate:

The fictitious name has been changed to:

Puleo Energy

The principal place of business has been changed to (PO Box alone not acceptable):

Number and Street	City	State	Zip	County
-------------------	------	-------	-----	--------

The following party(ies) has(have) been added to the registration and their signature(s) appear(s) at the end of this application.

Name	Number and Street	City	State	Zip
------	-------------------	------	-------	-----

The following party(ies) has(have) withdrawn from the business and their signature(s) appear(s) at the end of this application.

Name	Number and Street	City	State	Zip
------	-------------------	------	-------	-----

The fictitious name registration is cancelled.

6. Check box for Application for Amendment Only:

This amendment, without reference to any other filing sets forth all information with respect to the fictitious name which would be required in an original filing under the Fictitious Names Act.

7. (Optional) This application has been executed by an agent heretofore designated for that purpose in a prior filing in this registration.

IN TESTIMONY WHEREOF, the undersigned has (have) caused this Application for Amendment, Withdrawal or Cancellation of/from Fictitious Name to be executed this 10th day of December, 2018.

Adding party(ies) signature(s)	Withdrawing party(ies) signature (s)	All current party(ies) signature (s)
--------------------------------	--------------------------------------	--------------------------------------

**Leoco Financial LLC**

Name of Entity

**Samuel M Puleo**

Signature

**President**

Title

# Application Attachment B PA State Filings

ATTACHMENT B

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE

08/16/2019

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

I DO HEREBY CERTIFY THAT,

LEOCO FINANCIAL LLC

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

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



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

*Katlynn Bookman*

Acting Secretary of the Commonwealth

Certification Number: TSC190816181817-1

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

ATTACHMENT B.

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
CORPORATION BUREAU  
401 NORTH STREET, ROOM 206  
P.O. BOX 8722  
HARRISBURG, PA 17105-8722  
WWW.CORPORATIONS.STATE.PA.US/CORP

LEOCO FINANCIAL LLC

THE CORPORATION BUREAU IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE CORPORATION BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE CORPORATION BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT WWW.CORPORATIONS.STATE.PA.US/CORP OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 4136067

Samuel M. Puleo, Jr.  
PO Box 778  
Gwynedd Valley, PA 19437



ATTACHMENT B.

Entity #: 4136067  
Date Filed: 09/24/2012  
Carol Aichele  
Secretary of the Commonwealth

PENNSYLVANIA DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

Certificate of Organization  
Domestic Limited Liability Company  
(15 Pa.C.S. § 8913)

Name		
Samuel M. Puleo, Jr.		
Address		
PO Box 778		
City	State	Zip Code
Gwynedd Valley	PA	19437

Document will be returned to the  
name and address you enter to

Commonwealth of Pennsylvania  
CERTIFICATE OF ORGANIZATION 3 Page(s)



T1226962005

Fee: \$125

In compliance with the requirements of 15 Pa.C.S. § 8913 (relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

1. The name of the limited liability company (*designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation*):  
LEOCO FINANCIAL LLC

2. The (a) address of the limited liability company's initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street	City	State	Zip	County
604 Penllyn Pike	Penllyn	PA	19422	Montgomery

(b) Name of Commercial Registered Office Provider  
c/o: \_\_\_\_\_ County \_\_\_\_\_

3. The name and address, including street and number, if any, of each organizer is (*all organizers must sign on page 2*):

Name	Address
Samuel M. Puleo, Jr.	604 Penllyn Pike Penllyn, PA 19422

PA DEPT. OF STATE

SEP 24 2012

ATTACHMENT B.

OB:15-8913-2

~~4. Strike out if inapplicable item~~  
~~A member's interest in the company is to be evidenced by a certificate of membership interest.~~

~~5. Strike out if inapplicable.~~  
~~Management of the company is vested in a manager or managers.~~

6. The specified effective date, if any is: 09/18/2012  
month date year, if any

7. ~~Strike out if inapplicable. The company is a restricted professional company organized to render the following restricted professional services:~~  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. For additional provisions of the certificate, if any, attach an 8 1/2 x 11 sheet.


IN TESTIMONY WHEREOF, the organizer(s) has (have)  
signed this Certificate of Organization this  
18 day of September, 2012.

SAMUEL M. PULEO JR.  
Samuel M. Puleo Jr.  
Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

ATTACHMENT B.

 IRS DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
CINCINNATI OH 45999-0023

Date of this notice: 09-16-2012

Employer Identification Number:  
46-1008260

Form: SS-4

Number of this notice: CP 575 B

LEOCO FINANCIAL  
SAMUEL MICHAEL PULEO JR MBR  
PO BOX 778  
GWYNEDD VLY, PA 19437

For assistance you may call us at:  
1-800-829-4933

IF YOU WRITE, ATTACH THE  
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you  
EIN This EIN will identify you, your business accounts, tax returns, and  
documents, even if you have no employees. Please keep this notice in your permanent  
records.

When filing tax documents, payments, and related correspondence, it is very important  
that you use your EIN and complete name and address exactly as shown above. Any variation  
may cause a delay in processing, result in incorrect information in your account, or even  
cause you to be assigned more than one EIN. If the information is not correct as shown  
above, please make the correction using the attached tear off stub and return it to us.

Based on the information received from you or your representative, you must file  
the following form(s) by the date(s) shown.

Form 1065

04/15/2013

If you have questions about the form(s) or the due date(s) shown, you can call us at  
the phone number or write to us at the address shown at the top of this notice. If you  
need help in determining your annual accounting period (tax year), see Publication 538,  
*Accounting Periods and Methods*.

We assigned you a tax classification based on information obtained from you or your  
representative. It is not a legal determination of your tax classification, and is not  
binding on the IRS. If you want a legal determination of your tax classification, you may  
request a private letter ruling from the IRS under the guidelines in Revenue Procedure  
2004-1, 2004-1 I.R.B. 1 (or superseding Revenue Procedure for the year at issue). Note:  
Certain tax classification elections can be requested by filing Form 8832, *Entity  
Classification Election*. See Form 8832 and its instructions for additional information.

A limited liability company (LLC) may file Form 8832, *Entity Classification  
Election*, and elect to be classified as an association taxable as a corporation. If  
the LLC is eligible to be treated as a corporation that meets certain tests and it  
will be electing S corporation status, it must timely file Form 2553, *Election by a  
Small Business Corporation*. The LLC will be treated as a corporation as of the  
effective date of the S corporation election and does not need to file Form 8832.

To obtain tax forms and publications, including those referenced in this notice,  
visit our Web site at [www.irs.gov](http://www.irs.gov). If you do not have access to the Internet, call  
1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.



FEB 20 2010

PA PUBLICATIONS  
SERVICE  
ASSOCIATION

# Application Attachment C News Paper Filings

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:

January 23, 2020

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.

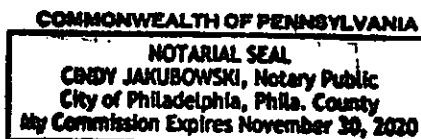


Sworn to and subscribed before me this 23rd day of  
January, 2020.



*Cindy Jakubowski*  
Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE

Applications of Leeco Financial, LLC (d/b/a Puteo Energy) 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

Leeco Financial, LLC dba Puteo Energy 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. Leeco Financial, LLC dba Puteo Energy 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. Leeco Financial, LLC dba Puteo Energy proposes to sell electricity, natural gas, and related services in PECO and Philadelphia Gas Works 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 Leeco Financial, LLC dba Puteo Energy 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 Leeco Financial, LLC dba Puteo Energy attorney at the address listed below.

By and through Counsel: Christopher Fiore  
Fiore & Barber, LLC  
415 Main Street, Suite 100  
Harrisburg, PA 17122  
717-258-0206 (phone)  
717-258-0206 (fax)

FEB 20 2010

PA PUBLIC WORKS COMMISSION  
SECRETARY'S OFFICE

# NGDC Bonding Letters



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

---

January 23, 2020

Mr. Samuel M. Puleo, Jr.  
President  
Leoco Financial LLC dba Puleo Energy  
1055 Virginia Drive STE 205  
Fort Washington, PA 19034  
Email: [sam.puleo@puleoenergy.com](mailto:sam.puleo@puleoenergy.com)

RE: Security Requirement Bond for Leoco Financial LLC dba Puleo Energy

Dear Mr. Puleo

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

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

JOHN ZUK  
Sr. Vice President, Gas Management

/dls

---





An Exelon Company

January 23, 2020

Samuel M. Puleo, Jr.  
Leoco Financial LLC dba Puleo Energy  
1055 Virginia Drive, Suite 205  
Fort Washington, PA 19034

Re: Broker Requirements

Dear Leoco Financial LLC dba Puleo Energy:

PECO is aware that Leoco Financial LLC dba Puleo Energy 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, Leoco Financial LLC dba Puleo Energy could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Leoco Financial LLC dba Puleo Energy 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 Leoco Financial LLC dba Puleo Energy 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 Leoco Financial LLC dba Puleo Energy the creditworthiness requirement for PECO's exposure to Leoco Financial LLC dba Puleo Energy changes in the future, PECO reserves the right to require Leoco Financial LLC dba Puleo Energy 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 black ink that reads "Carlos P. Thillet".

Carlos P. Thillet

Manager, Gas Supply and Transportation  
2301 Market Street  
Philadelphia, Pa 19103

FEB 20 2010

FA PUL 1107 JUNE 11 10 51 AM '10  
SECRETARY'S OFFICE

# Application Attachment G Resume of Applicant's Officer

## ATTACHMENT G

**Samuel M. Puleo, Jr.**  
604 Penllyn Pike  
Penllyn, PA 19422  
610-955-2994  
[sam.puleo@puleoenergy.com](mailto:sam.puleo@puleoenergy.com)

### ❖ EXPERIENCE

- **Leoco Financial LLC d/b/a Puleo Energy - Fort Washington, PA (March 2016 – Present)**  
President
  - Worked as an exclusive sales sub-contractor of licensed EGS brokers Frontline Power Solutions (2016 – 2017), My Energy Option (2017 – 2019), and Inertia Resources (2019 – Present).
  - Worked as an exclusive sales sub-contractor of licensed NGS broker National Utilities Refund.
  - Contracted over 250 individual commercial energy customers totaling over 50,000,000 annual kWh and 800,000 annual CCF.
  - Retained over 95% of customer base from 2016 – present.
  
- **Apollo Energy Management Advisors - Allentown, PA (February 2015 – January 2016)**  
Shareholder, Director
  - Re-entered the utility bill audit and energy generation brokerage business through the formation of Apollo Energy Management Advisors LLC in 2015.
  - Worked as an exclusive sales sub-contractor of licensed EGS brokers Global Vision Energy and Frontline Power Solutions, individually.
  
- **Pocono Peterbilt - Bartonsville, PA (August 2014 – June 2015)**  
Business Development Manager
  - Responsible for overall growth of dealership through the prospecting of national fleet accounts.
  - Responsible for developing strategic partnerships to drive revenue.
  - Delivered over \$40,000,000 in new sales exposure through new quotes.
  
- **Hunter Keystone Peterbilt - Breinigsville, PA (August 2013 – June 2014)**  
Truck Sales Representative
  - Responsible for selling heavy and medium duty trucks to both the fleet and small business markets.
  - Was 200% of quota for FY' 2014 and sold over \$7,000,000 worth of new trucks in 12 months.
  - Converted two large fleet accounts to Peterbilt equipment.

➤ **Coastal Energy Consultants LLC - Allentown, PA (June 2011 – August 2013)**

Chief Executive Officer

- Was CEO of Coastal Energy Consultants, a commercial utility bill audit and energy brokerage firm.
- Grew sales revenue by 200% in 2012.
- Grew national team of salespeople to over 100.
- Federally indicted in October 2013 related to my activity within the company.

➤ **MSGE LLC - Allentown, PA (November 2010 – August 2013)**

President

- Company was sales agent of Stream Energy, a licensed electric and natural gas supplier.
- Grew sales force of 20 independent representatives to over 5,000 independent representatives between December 2010 and August 2013.
- Grew residential energy customer count to over 18,000 customers.

➤ **ADP, Automatic Data Processing - Allentown, PA (March 2008 – July 2009)**

Inside Sales Manager, National Accounts

- Was responsible for selling time and labor management software to companies with 1,000+ employees.
- Was 367% of Quota for FY' 2009 and sold \$746,670 worth of product.
- Was the number 1 sales representative in the division.

❖ **EDUCATION**

➤ **St. Joseph's Preparatory School - Philadelphia, PA**

- National Honors Society Member
- Captain of Football and Golf Teams
- 3.98 GPA

➤ **Temple University – Fox School of Business - Philadelphia, PA**

- Full Academic Scholarship
- Honors Student

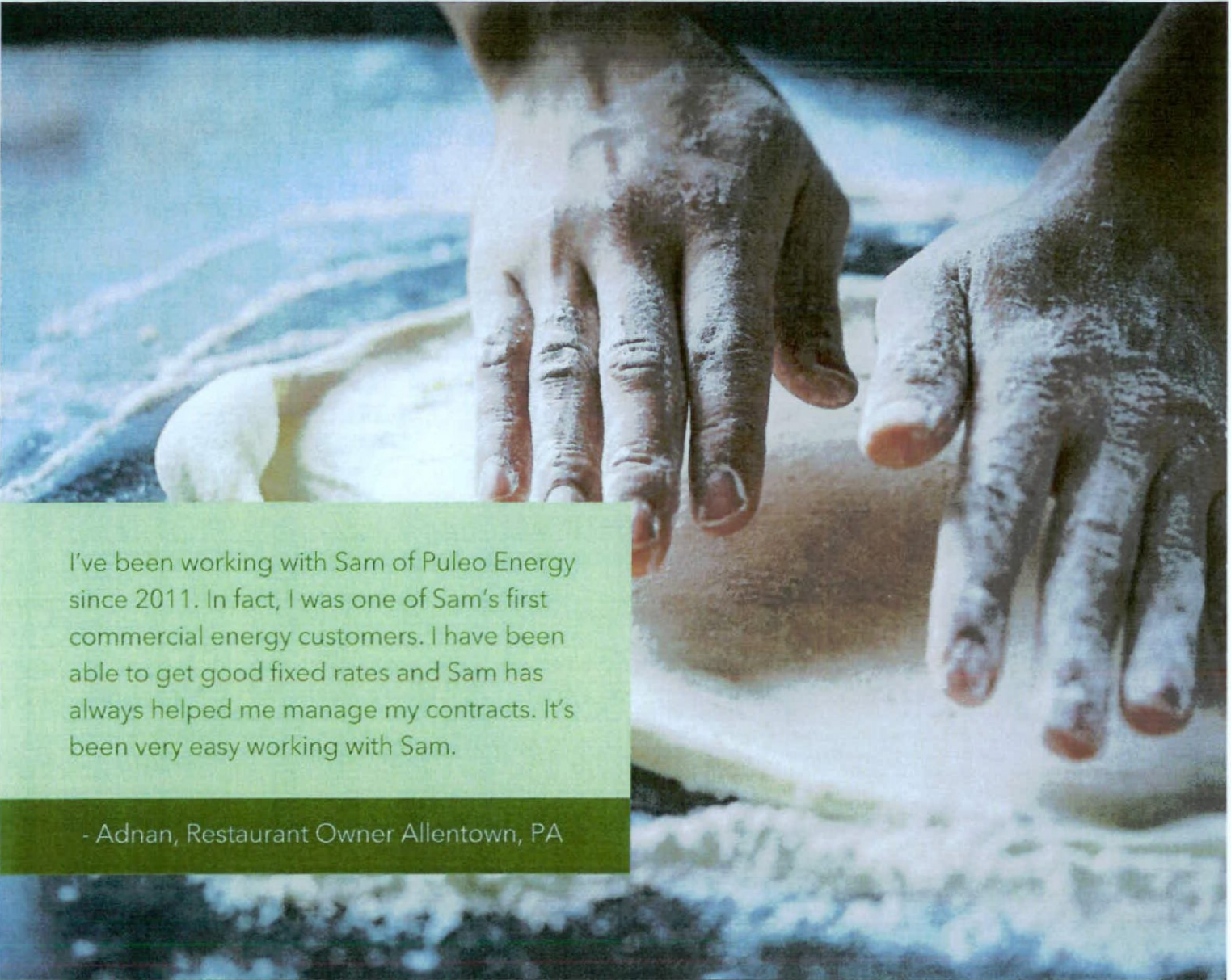
FEB 20 11 20

PA PUBLIC UTILITIES COMMISSION  
REC'D - REGULATORY

# Application Attachment I Marketing Brochure



 **Puleo**Energy  
Great Rates. Better People.



I've been working with Sam of Puleo Energy since 2011. In fact, I was one of Sam's first commercial energy customers. I have been able to get good fixed rates and Sam has always helped me manage my contracts. It's been very easy working with Sam.

- Adnan, Restaurant Owner Allentown, PA

## About Us

---

Puleo Energy was founded in 2012 by Sam Puleo. The company helps small businesses get and maintain better fixed prices for electricity and natural gas in Eastern Pennsylvania.

At the age of 24 while running Coastal Energy Consultants, Sam Puleo made a terrible decision that led to a federal indictment and conviction. He learned the great life lesson of humility through this experience and decided to work hard to redeem his reputation.

Puleo Energy was founded with the mission to always be transparent, operate with



Electricity

We help our customers vet electric suppliers, find the lowest fixed rates, and negotiate favorable contract terms.



Natural Gas

We help our customers learn about the natural gas markets, find the right price structures, and save on costs.



360° Service

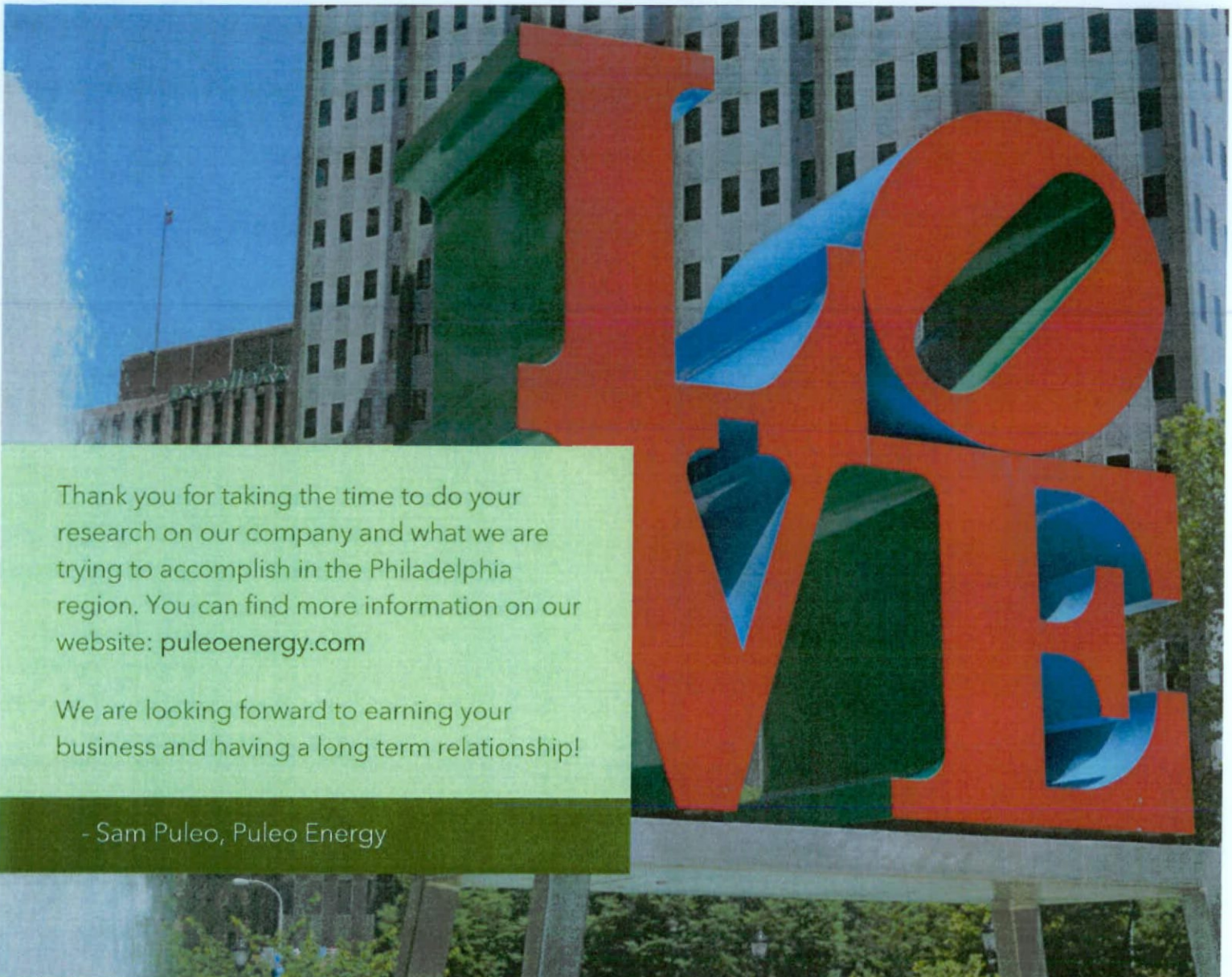
Whether you're in a legal battle with your last energy supplier or your bill seems too high, we are a phone call away.



Market Monitoring

So you've got a great rate, what now? We monitor the market always looking for a better price for your next contract.





Thank you for taking the time to do your research on our company and what we are trying to accomplish in the Philadelphia region. You can find more information on our website: [puleoenergy.com](http://puleoenergy.com)

We are looking forward to earning your business and having a long term relationship!

- Sam Puleo, Puleo Energy

## Contact Us

---

Puleo Energy  
1055 Virginia Drive  
Suite 205  
Fort Washington, PA 19034  
610-955-2994  
[info@puleoenergy.com](mailto:info@puleoenergy.com)

FEB 20 2013

PA PULTECH ENERGY SOLUTIONS  
SECURITY DIVISION

# Application Attachment J New Customer Letter

ATTACHMENT J



1055 Virginia Drive, Suite 103  
Fort Washington, PA 19034  
800-671-5123  
[puleoenergy.com](http://puleoenergy.com)

Sample Customer  
123 Main Street  
Sample, PA 19000

Dear Mr. Customer,

Thank you for choosing Puleo Energy as your energy broker. We are happy to have you as a new customer and are excited about being at your service.

We have outlined the terms of your new natural gas supply agreement below. Please call us if you have any questions.

<b>Your New Gas Supplier</b>	ABC Gas Supply Inc. 800-111-2222 <a href="http://www.abcgas.com">www.abcgas.com</a>
<b>Your New Price</b>	\$0.389 / CCF (fixed – please refer to contract)
<b>Contract Term</b>	24 billing cycles
<b>Contract Start – Contract End</b>	June 2020 – June 2022
<b>Cancellation Fees</b>	Liquidated damages (please refer to contract)
<b>Supplier Renewal Terms</b>	Month-to-month variable price.
<b>Your Puleo Energy Contact</b>	Sam Puleo
<b>Contact Number</b>	610-955-2994
<b>Contact Email</b>	<a href="mailto:Sam.puleo@puleoenergy.com">Sam.puleo@puleoenergy.com</a>

FEB 9 2014

PAPERWORK REDUCTION ACT SECTION 5010-108  
SECRET/NO FORN DISSEM

# Application Attachment K Customer Quote



# Custom Energy Proposal for Customer ABC

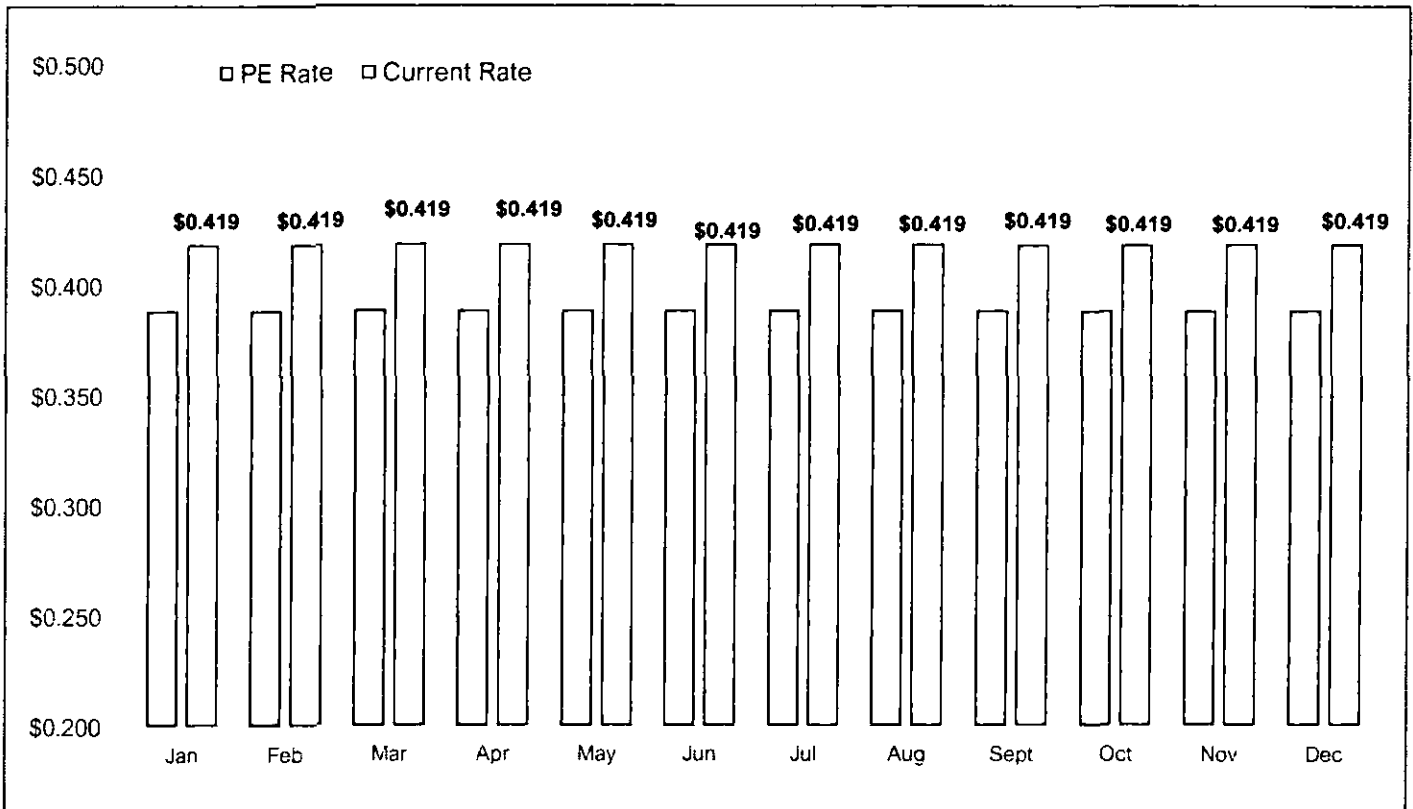
Your 12 month CCF **12,000**

Your 12 month avg. **\$0.419**

Estimated 12 month savings.\* **\$360**

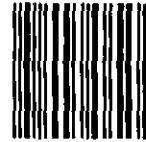
Supplier's 24 Month fixed. **\$0.389**

Estimated 24 Month savings.\* **\$720**





1007



17120

U.S. POSTAGE PAID  
PME 1-Day  
SPRING HOUSE, PA  
18477  
FEB 20, 20  
AMOUNT  
**\$27.95**  
R2305M148235-32

FOR DOMESTIC AND INTERNATIONAL USE



**PRIORITY  
MAIL  
EXPRESS®**



EJ 135 113 924 US

**CUSTOMER USE ONLY**

**FROM:** (PLEASE PRINT) PHONE ( )

Puleo Energy  
Leoco Financial LLC dba  
Puleo Energy  
1055 Virginia Drive Suite 205  
Ft. Washington, Pa 19034

**DELIVERY OPTIONS (Customer Use Only)**

**SIGNATURE REQUIRED** Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

**Delivery Options**

No Saturday Delivery (delivered next business day)  
 Sunday/Holiday Delivery Required (additional fee, where available)  
 10:30 AM Delivery Required (additional fee, where available)  
 \*Refer to USPS.com® or local Post Office® for availability.

**TO:** (PLEASE PRINT) PHONE ( )

Pa Public Utility Commission  
Secretary  
400 North St., Keystone Building  
Harrisburg, Pa 17120  
ZIP + 4® (U.S. ADDRESSES ONLY)

**PAYMENT BY ACCOUNT (if applicable)**

USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

**ORIGIN (POSTAL SERVICE USE ONLY)**

1-Day  2-Day  Military  DPO

PO ZIP Code 19477	Scheduled Delivery Date (MM/DD/YY) 2-21-2020	Postage \$27.95	
Date Accepted (MM/DD/YY) 2-20-2020	Scheduled Delivery Time <input type="checkbox"/> 10:30 AM <input type="checkbox"/> 3:00 PM <input checked="" type="checkbox"/> 12 NOON	Insurance Fee \$	COD Fee \$
Time Accepted 12:39 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	10:30 AM Delivery Fee \$	Return Receipt Fee \$	Live Animal Transportation Fee \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total Postage & Fees 77.95	
Weight 3 lbs. 0 oz.	Flat Rate <input type="checkbox"/> Acceptance Employee Initials /H		

**DELIVERY (POSTAL SERVICE USE ONLY)**

Delivery Attempt (MM/DD/YY) Time  A  P

Delivery Attempt (MM/DD/YY) Time  A  P

■ For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.  
■ \$100.00 insurance included.

PEEL FROM THIS CORNER

\* Money Back Guarantee to U.S., select APO/FPO/DPO, and select International destinations. See DMM and IMM at ps.usps.com for complete details.  
† Money Back Guarantee for U.S. destinations only.

**To: PUC SECRETARY BUREAU**  
Agency: PUC  
Floor:

External Carrier: EXPRESS

2/21/2020 10:00:19 AM



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