

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

To the Pennsylvania Public Utility Commission:

### 1. IDENTIFICATION AND CONTACT INFORMATION

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

Zentility, INC.  
301 4th Street, PO Box 20  
Annapolis, MD 21403  
www.zentility.com  
877-936-8454

- 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.

Kyle Nicholson  
434 N. Front St  
Wormsleyburg, PA 17043  
717-766-9244

- 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.

Cassandra Heller, Director of Finance  
5 Michigan Drive  
Natick, MA 01760  
508-685-5026  
cheller@zentility.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.

No attorney is being used

- 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.

Ryan Peusch, President  
301 4th Street, STE 20  
Annapolis, MD 21403  
443-710-1920  
rpeusch@zentility.com

Craig Tobe, Chief Technology Officer  
5 Michigan Drive  
Natick, MA 01760  
610-551-2667  
ctobe@zentility.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.

**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. See Attachment A
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. See Attachment B
- Give name and address of officers. See Attachment C

### 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.

None

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.

HomeAde, LLC d.b.a./ Zentility  
1350 Magnolia Avenue  
Annapolis, MD 21403  
www.zentility.com  
443-710-1920

## 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)      Electric Energy Broker

or

- The Applicant is not presently doing business in Pennsylvania.

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

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

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

Zentility, INC. utilizes their Zen Marketplace to broker deals for residential and commercial customers in exchange for a small fee per amount used. The Zen Marketplace allows suppliers to bid on contracts from our customers.

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

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

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

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)
- Residential and Small Commercial as Mixed Meter **ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)**
- Large Commercial Customers - (6,000 Mcf or more annually)
- Industrial Customers
- Governmental Customers
- All of above (Except Mixed Meter)
- Other (Describe):

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

Upon granting of license

## 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.

No such proceedings.

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

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. **Applicant should also include if it had a Pennsylvania PUC EGS or NGS license previously cancelled by the Commission.** If the Applicant has no actions or complaints to list, explicitly state such.

Applicant has no such actions.

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

## 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.

<p><b>Columbia Gas of PA, Inc.</b>  Michele Caddell  290 W. Nationwide Blvd.  Columbus, OH 43215  PH: 614.460.6841  FAX: 614.460.8447  e-mail: <a href="mailto:mcaddell@nisource.com">mcaddell@nisource.com</a></p>	
<p><b>Peoples Natural Gas Company LLC – Equitable Division</b>  Carol Scanlon  375 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6931  FAX: 412.208.6577  e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>National Fuel Gas Distribution Corp.</b>  Joanne E. Maciok  6363 Main Street  Williamsville, NY 14221  PH: 716.857.7670  FAX: 716.857.7479  e-mail: <a href="mailto:maciokj@natfuel.com">maciokj@natfuel.com</a></p>
<p><b>Peoples Natural Gas Company LLC</b>  Carol Scanlon  375 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6931  FAX: 412.208.6577  e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>PECO</b>  Carlos Thillet, Manager, Gas Supply and Transportation  2301 Market Street, S9-2  Philadelphia, PA 19103  PH: 215.841.6452  Email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a></p>
<p><b>Peoples Gas Company LLC</b>  Carol Scanlon  375 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6931  FAX: 412.208.6577  e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>Philadelphia Gas Works</b>  Ryan Reeves, Director Supply Transportation &amp; Control  800 West Montgomery Avenue  Philadelphia, PA 19122  PH: 215.787.5103  email: <a href="mailto:pgwchoicesupply@pgworks.com">pgwchoicesupply@pgworks.com</a></p>
<p><b>Valley Energy Inc.</b>  Ed Rogers  523 South Keystone Avenue  Sayre, PA 18840-0340  PH: 570.888-9664  FAX: 570.888.6199  email: <a href="mailto:erogers@ctenterprises.org">erogers@ctenterprises.org</a></p>	<p><b>UGI Utilities, Inc. – Gas Division</b>  Sherry Epler  1 UGI Drive  Denver, PA 17517  PH: 610.796.3447  Email: <a href="mailto:sepler@ugi.com">sepler@ugi.com</a></p>

## 7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require. The contact information is located in Section 6.b.
- 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. Please see Attachment D
  - 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. Please see Attachment E
  - 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 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.
- d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.

Zentility, INC collects its fee directly from the supplier when the customer has paid their utility bill.



- 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.

Cassandra Heller, Director of Finance  
5 Michigan Drive  
Natick, MA 01760  
508-685-5026  
cheller@zentility.com

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

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

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

## 8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by natural gas distribution companies does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

- a. **EXPERIENCE, PLAN, STRUCTURE:** such information may include:

- Applicant's previous experience in the natural gas industry. Attachment F
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions. Attachment G
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

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

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

c. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes  
 No

If yes, will the Applicant be using verification procedures?

- Yes  
 No

If yes, describe the Applicant's verification procedures.

d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

In order to ensure all marketing is performed in an ethical manner for both employees and subcontractors, Zentility trains new employees as well as routinely holds marketing meetings that the training is being continued as well as verified on a regular basis.

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 Attachment H

## 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.

## 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.

**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.

**12. NEWSPAPER PUBLICATIONS**

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

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.


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

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

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

*(Example Publications are provided at Appendices F and G)*

**13. SIGNATURE**

Applicant:   
 By: Craig Tobe  
 Title: CTO

**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:** Zentility, INC.

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

PUC Secretary's Bureau Use

## Appendix C

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

### CERTIFICATE OF SERVICE TEMPLATE

On this the 11 day of June 2020, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

<p><b>Office of Consumer Advocate</b> 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120</p>	<p><b>Office of the Attorney General</b> Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120</p>
<p><b>Office of the Small Business Advocate</b> Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101</p>	<p><b>Commonwealth of Pennsylvania</b> Department of Revenue Bureau of Compliance Harrisburg, PA 17128-0946</p>
<p><b>Columbia Gas of PA, Inc.</b> Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: <a href="mailto:mcaddell@nisource.com">mcaddell@nisource.com</a></p>	<p><b>Bureau of Investigation &amp; Enforcement</b> Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120</p>
<p><b>Peoples Natural Gas Company LLC – Equitable Division</b> Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>National Fuel Gas Distribution Corp.</b> Joanne E. Maciok 6363 Main Street Williamsville, NY 14221 PH: 716.857.7670 FAX: 716.857.7479 e-mail: <a href="mailto:maciokj@natfuel.com">maciokj@natfuel.com</a></p>
<p><b>Peoples Natural Gas Company LLC</b> Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>PECO</b> Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a></p>
<p><b>Peoples Gas Company LLC</b> Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>Philadelphia Gas Works</b> Ryan Reeves, Director Supply Transportation &amp; Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: <a href="mailto:pgwchoicesupply@pgworks.com">pgwchoicesupply@pgworks.com</a></p>

**Valley Energy Inc.**

Ed Rogers  
523 South Keystone Avenue  
Sayre, PA 18840-0340  
PH: 570.888-9664  
FAX: 570.888.6199  
email: [erogers@ctenterprises.org](mailto:erogers@ctenterprises.org)

**UGI Utilities, Inc. – Gas Division**

Sherry Epler  
1 UGI Drive  
Denver, PA 17517  
PH: 610.796.3447  
Email: [sepler@ugi.com](mailto:sepler@ugi.com)



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Craig Tebe, Chief Technology Officer





Attachment A- Section 2 Item B

Certificate of Registration

Please see next page

THE NEW WAY TO TAKE CARE OF YOUR ENERGY

INFO@ZENTILITY.COM  443.710.1920

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE

05/20/2020

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

I DO HEREBY CERTIFY THAT,

Zentility, INC

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

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



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

*Katly Bookman*

Secretary of the Commonwealth

Certification Number: TSC200520090211-1

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



Attachment B- Section 2 Item B  
Incorporation Documents within Delaware

Please see next page

THE NEW WAY TO TAKE CARE OF YOUR ENERGY

INFO@ZENTILITY.COM  443.710.1920

# Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CONVERSION OF A MARYLAND LIMITED LIABILITY COMPANY UNDER THE NAME OF "HOMEADE, LLC" TO A DELAWARE CORPORATION, FILED IN THIS OFFICE ON THE SEVENTH DAY OF AUGUST, A.D. 2019, AT 3:16 O`CLOCK P.M.*



  
Jeffrey W. Bullock, Secretary of State

7557850 8100V  
SR# 20198164833

Authentication: 204036476  
Date: 11-19-19

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

STATE OF DELAWARE  
CERTIFICATE OF CONVERSION  
FROM A LIMITED LIABILITY COMPANY TO A  
CORPORATION PURSUANT TO SECTION 265 OF  
THE DELAWARE GENERAL CORPORATION LAW

- 1.) The jurisdiction where the Limited Liability Company first formed is Maryland.
- 2.) The jurisdiction immediately prior to filing this Certificate is Maryland.
- 3.) The date the Limited Liability Company first formed is April 24, 2014.
- 4.) The name of the Limited Liability Company immediately prior to filing this Certificate is HomeADE, LLC.
- 5.) The name of the Corporation as set forth in the Certificate of Incorporation is Zentility, Inc.

IN WITNESS WHEREOF, the undersigned being duly authorized to sign on behalf of the converting Limited Liability Company have executed this Certificate on the 7<sup>th</sup> day of August, A.D. 2019.

By: R. R.

Name: Ryan Peusch  
Print or Type

Title: Chief Executive Officer  
Print or Type

# Delaware

Page 1

TelFirstState

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "ZENTILITY, INC.", FILED IN THIS OFFICE ON THE SEVENTH DAY OF AUGUST, A.D. 2019, AT 3:16 O`CLOCK P.M.



7557850 8100  
SR# 20198164833

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Jeffrey W. Bullock, Secretary of State

Authentication: 204036477

Date: 11-19-19

**STATE of DELAWARE**  
**CERTIFICATE of INCORPORATION**  
**A STOCK CORPORATION**

**First:** The name of this Corporation is Zentility, Inc.

**Second:** Its registered office in the State of Delaware is to be located at 919 North Market Street, Suite 950, in the City of Wilmington, County of New Castle, Zip Code 19801.

The registered agent in charge thereof is Incorp Services, Inc.

**Third:** The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

**Fourth:** The total number of shares of all classes of stock that the Corporation has authority to issue is 30,000 consisting of (a) 27,000 shares of Common Stock, \$0.00001 per share ("Common Stock"), (b) 3,000 shares of Preferred Stock, \$0.00001 per share ("Preferred Stock"). The Preferred Stock may be issued from time to time in one or more series, each of such series to consist of such number of shares and to have such terms, rights, powers and preferences, and the qualifications and limitations with respect thereto, as stated or expressed herein.

**A. COMMON STOCK**

The following rights, powers privileges and restrictions, qualifications, and limitations apply to the Common Stock. There shall be two classes of Common Stock: Class A and Class B. The holders of the Class A Common Stock are entitled to one vote for each share of Common Stock held at all meetings of stockholders (and actions in lieu of meetings). Unless required by law, there shall be no cumulative voting. The number of authorized shares of Common Stock may be increased or decreased (but not below the number of shares thereof then outstanding) by (in addition to any vote of the holders of one or more series of Preferred Stock that may be required by the terms of the Certificate) the affirmative vote of the holders of shares of capital stock of the Corporation representing a majority of the votes represented by all outstanding shares of capital stock of the Corporation entitled to vote, irrespective of the provisions of Section 242(b)(2) of the General Corporation Law. The holders of the Class B Common Stock are not entitled to vote at any meetings of stockholders (or actions in lieu of meetings).

**B. PREFERRED STOCK**

The following rights, powers and privileges, and restrictions, qualifications and limitations, shall apply to the Preferred Stock. Holders of the Preferred Stock shall be entitled to

preferred dividends in the amount of four percent (4.0%) of their initial capital contributions annually prior to the first to occur of the following: (i) a Sale of the Corporation; or (ii) a liquidation of the Corporation (the earlier of (i) and (ii) being the "Preferred Payment Date"). Sale of the Corporation means (a) the sale of all of the issued and outstanding stock of the Corporation, (b) the sale of all or substantially all of the assets of the Corporation, or (c) the merger or consolidation of the Corporation with or into an entity in which the shareholders do not have Control immediately following such merger or consolidation. Control (including the terms "Controlled by and "under Common Control with") means the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of an entity (whether through the ownership of voting securities, by contract, as trustee or executor or otherwise). Without limiting the generality of the foregoing, control shall be deemed to exist upon the ownership of securities entitling the holder thereof to exercise more than 50% of the voting power in the election of directors of such entity (or other persons or body performing similar functions). Prior to the Corporation paying dividends to its common shareholders, the Corporation shall pay all accrued but unpaid preferred dividends to the preferred stockholders.

**Fifth:** The name and mailing address of the incorporator are as follows:

Name: Wayne M. Lee

Mailing address: 1750 Tysons Blvd., Suite 1500  
McLean, VA 22102

**I, The Undersigned,** for the purpose of forming a corporation under the laws of the State of Delaware, do make, file and record this Certificate, and do certify that the facts herein stated are true, and I have accordingly hereunto set my hand this 7<sup>th</sup> day of August, A.D. 2019.

BY: Wayne M. Lee (Incorporator)

NAME: \_Wayne M. Lee





**Attachment C - Section 2**

*Provide the names, titles and addresses of the applicant's principal officers.*

Ryan Peusch, President & CEO  
1350 Magnolia Avenue  
Annapolis MD 21403

Craig Tobe, Chief Technology Officer  
1350 Magnolia Avenue  
Annapolis, MD 21403



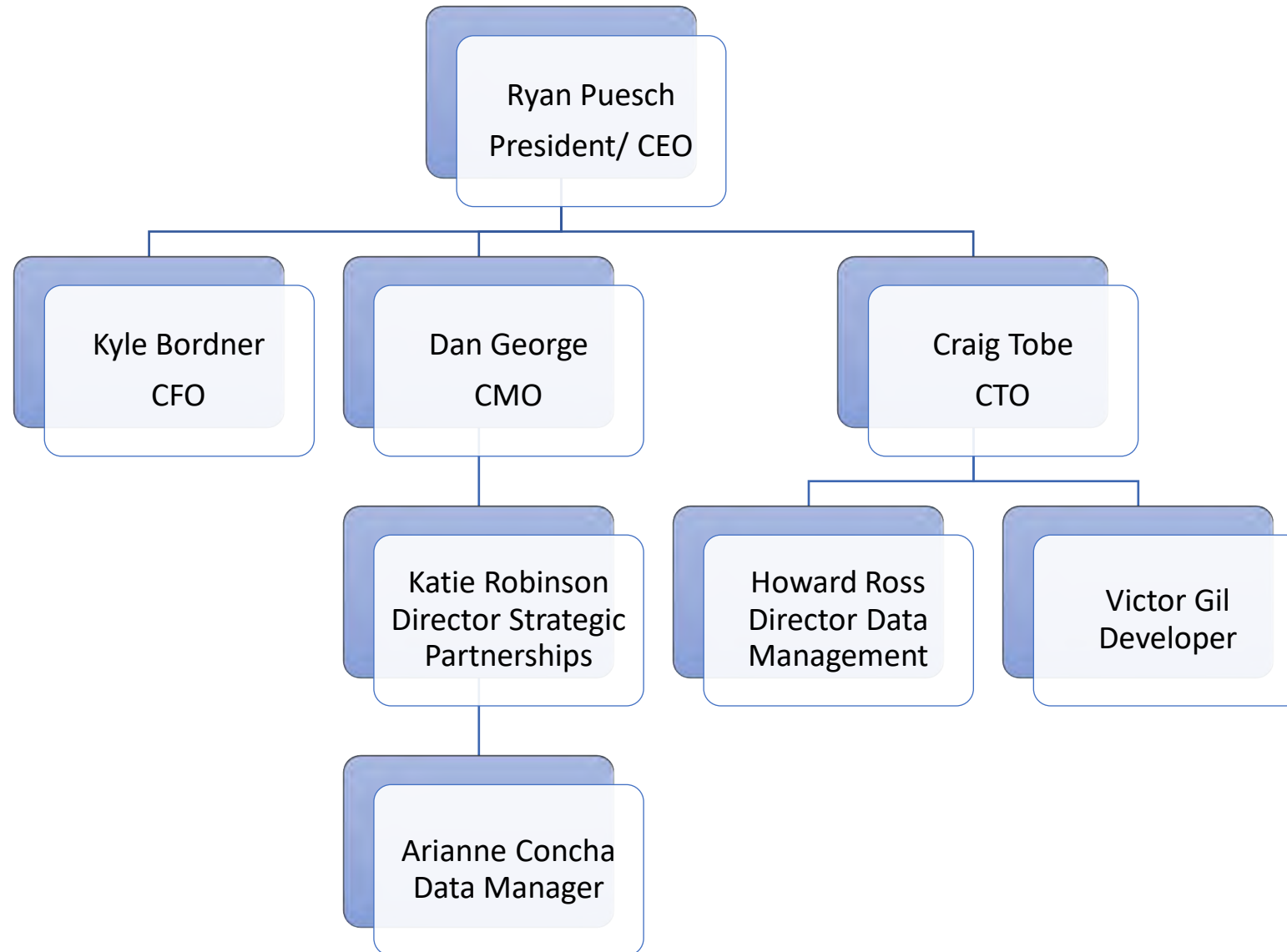
Attachment D

Please see next page for Organizational Chart

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INFO@ZENTILITY.COM  443.710.1920

# Zentility, INC. Organizational Structure





Attachment E

Dunn & Broadstreet Credit Report

Due to the confidential nature of this report, it will be filled separately from the application

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## Attachment F

### Previous Experience

Zentility INC is an *automated energy service* formed to provide transparency to a complex and under-educated market in which energy is a big cost and an even bigger opportunity for businesses. Through its patent-pending algorithmic decision engine, the company is *reimagining* how businesses manage their energy. Its automated energy management service puts clients first. In doing so, the company has created an effortless way to manage energy for *a new generation* of business owners. Zentility, INC. converted from HomeAde, LLC, which operated for over 5 years, in August of 2019.

#### **The Team:**

***Ryan Peusch, Chief Executive Officer*** - 10 years of diverse experience in energy management, business development, technology product management, and consulting. He worked in Business Development for Exelon, the leading U.S. power generator and Retail Energy Supplier, helping to develop and provide in-depth education on complex product structures and energy settlement options within the following industry segments: Power, Natural Gas, Load Response, Energy Efficiency, Solar, and Renewable Energy. He managed over \$30 million in energy related contracts while at Exelon.

***Craig Tobe, Chief Technology Officer*** - Senior architect specializing in developing and scaling client/server applications. Craig created the marketplace which our company is based around. He has contributed to the success of major applications at companies like eBay, Constant Contact, FINRA, NPR, the American Red Cross, and many others across the finance, e-commerce, marketing, and media sectors.



Attachment G

Proof of other Natural Gas Broker Licenses and Jurisdictions

Florida- license not required

Virginia- A-90

New York- license not required

Pennsylvania- Pending

New Hampshire- DM 20-94

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

AT RICHMOND, MARCH 16, 2020

SCC-CLERK'S OFFICE  
INSTRUMENT CONTROL CENTER  
2020 MAR 16 P 2: 19

20200320153

APPLICATION OF

ZENTILITY, INC.

CASE NO. PUR-2019-00204

For a license to do business as an  
electricity and natural gas aggregator

ORDER GRANTING LICENSE

On January 13, 2020, Zentility, Inc. ("Zentility" or "Company") completed an application with the State Corporation Commission ("Commission") for a license to do business as an electricity and natural gas aggregator in the Commonwealth of Virginia ("Application").<sup>1</sup> The Company seeks authority to market electricity and natural gas aggregation services to eligible commercial, industrial, and residential customers throughout Virginia.<sup>2</sup> Zentility attested that it would abide by all applicable regulations of the Commission as required by 20 VAC 5-312-40 B of the Commission's Rules Governing Retail Access to Competitive Energy Services ("Retail Access Rules").<sup>3</sup>

---

<sup>1</sup> The Company filed its initial Application on December 2, 2019. The Company filed additional information on January 13, 2020, after which it was deemed complete.

<sup>2</sup> Pursuant to § 56-577 of the Code of Virginia ("Code"), retail choice for electricity is only permitted pursuant to the customer classes, load parameter, and renewable energy sources set forth therein. Retail choice thereunder, exists only in the service territories of Virginia Electric and Power Company d/b/a Dominion Energy Virginia ("Dominion"), Appalachian Power Company, and the electric cooperatives. Pursuant to plans as required by Code § 56-235.8 A, retail choice for natural gas service exists only in the service territories of Washington Gas Light Company and Columbia Gas of Virginia, Inc. Access to large commercial and industrial gas customers in all gas distribution service territories has existed under Federal Energy Regulatory Commission authority since the mid-1980s.

<sup>3</sup> 20 VAC 5-312-10 *et seq.*

On January 15, 2020, the Commission entered an Order for Notice and Comment ("Procedural Order") that, in part, required the Company to serve a copy of the Procedural Order on or before January 24, 2020, to each of the utilities listed in Attachment A of the Procedural Order and to provide proof of service by January 31, 2020. The Procedural Order further directed the Staff of the Commission ("Staff") to analyze the Application and present its findings in a report ("Staff Report").

On February 13, 2020, the Company filed a letter indicating that it served the Procedural Order on February 3, 2020, and requesting that the Commission accept the proof of service out of time. To allow each of the utilities listed in Attachment A of the Procedural Order additional time to file written comments on the Application, Staff filed a Motion for Modification of Procedural Schedule ("Motion") on February 13, 2020.

On February 18, 2020, the Commission issued an Order Granting Motion accepting the Company's late-filed proof of service and service of notice out of time and extending the dates to file written comments, the Staff Report, and comments on the Staff Report to February 25, 2020, March 2, 2020, and March 9, 2020, respectively.

Dominion filed comments on February 24, 2020.

On March 2, 2020, Staff filed its report, which summarized Zentility's Application and evaluated its financial and technical fitness. Staff recommended that Zentility be granted a license to provide electric and natural gas aggregation services to eligible commercial, industrial, and residential customers in the Virginia service territories that are open to retail competition.

Zentility did not file a response to the Staff Report or the comments filed by Dominion.



NOW THE COMMISSION, upon consideration of the Application, the Staff Report, and applicable law, finds that Zentility's Application for a license to provide electric and natural gas aggregation services should be granted, subject to the conditions set forth below.

Accordingly, IT IS ORDERED THAT:

(1) Zentility is hereby granted license No. A-90 to provide competitive aggregation service of electricity and natural gas to commercial, industrial, and residential customers throughout the service territories open to competition in the Commonwealth of Virginia. This license to act as an aggregator is subject to the provisions of the Retail Access Rules, this Order, and other applicable statutes.

(2) This license is not valid authority for the provision of any product or service not identified within the license itself.

(3) This case shall remain open for consideration of any subsequent amendments or modifications to this license.

AN ATTESTED COPY hereof shall be sent by the Clerk of the Commission to Molly Martinez, Director of Operations, Zentility, Inc., 1350 Magnolia Avenue, Annapolis, Maryland 21403; Lauren W. Biskie, Esquire, Dominion Energy Services, Inc., Law Department, 120 Tredegar Street, Richmond, Virginia 23219; and C. Meade Browder, Jr., Senior Assistant Attorney General, 202 N. 9th Street, 8th Floor, Richmond, Virginia 23219. A copy shall also be delivered to the Commission's Office of General Counsel and the Divisions of Utility Accounting and Finance and Public Utility Regulation.

CHAIRWOMAN  
Dianne Martin

STATE OF NEW HAMPSHIRE

TDD Access: Relay NH  
1-800-735-2964

COMMISSIONERS  
Kathryn M. Bailey  
Michael S. Giaimo



Tel. (603) 271-2431

FAX No. 271-3878

EXECUTIVE  
DIRECTOR  
Debra A. Howland

Website:  
[www.puc.nh.gov](http://www.puc.nh.gov)

PUBLIC UTILITIES COMMISSION

21 S. Fruit St., Suite 10  
Concord, N.H. 03301-2429

June 12, 2020

Craig Tobe, Chief Technology Officer  
Zentility, Inc.  
301 4<sup>th</sup> Street, Suite 20  
Annapolis, MD 21403

Re: DM 20-094, Zentility, Inc.  
Application to Register as Provider of Natural Gas Aggregation Service

Dear Mr. Tobe:

On June 10, 2020, Zentility, Inc. (Zentility) submitted an application with the Commission to register as a provider of natural gas aggregation service.

Commission Staff filed a memorandum on June 12, 2020, in which it confirmed its review of the application and its conclusion that the application meets the requirements for registration under N.H. Code Admin. Rules Puc 3000. Staff recommended that Zentility's registration application be approved for a two-year term.

The Commission has approved Staff's recommendation. Accordingly, Zentility's application for registration is approved, effective as of June 12, 2020. The registration is for a term of two years and expires at the close of business on June 12, 2022. Pursuant to Puc 3003.05(a), you must submit a renewal application at least 60 days prior to the expiration of the approved registration term, on or before April 13, 2022.

Please be aware that registered providers of natural gas aggregation service are subject to specific requirements contained in N.H. Code Admin. Rules Puc 3000 – Competitive Natural Gas Supplier and Aggregator Rules. These rules are available at: <http://www.puc.nh.gov/Regulatory/Rules/PUC3000.pdf>.

Sincerely,

A handwritten signature in cursive script that reads "Debra A. Howland".

Debra A. Howland  
Executive Director

cc: Service List  
Docket File



Attachment H

Resumes for Ryan Peusch, CEO, and Craig Tobe, CTO.

Please see next page

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INFO@ZENTILITY.COM  443.710.1920

# RYAN PEUSCH

1350 Magnolia Avenue, Annapolis, MD 21403 · (443) 710-1920  
rpeusch@zentility.com · [www.zentility.com](http://www.zentility.com)

## SUMMARY

---

Ryan Peusch is energy veteran with over 10 years of energy knowledge and expertise. Before starting Zentility, Inc. Ryan was a successful Business Development Manager working at the largest energy company in the United States (Exelon). Ryan was responsible for bringing new, highly technical energy products to market, and developed lasting relationships with customers. Ryan comes with a highly technical background for high-level energy sales, dealing with fortune 500 companies on a regular basis.

## EXPERIENCE

---

### **Zentility, Inc.**

*Chief Executive Officer*, September 2018 – Present

- Dedicated to bringing transparent energy solutions to customers at all times.
- Help customers manage their cost and bring their risk down over time.
- Highly trained on a cutting edge energy products and services.

### **CMES**

*Director of Business Development*, October 2013 – May 2018

- Supported the CMES brand by spreading awareness and marketing online.
- Worked on energy efficiency opportunities, CMES would engineer and perform the efficiency project.

### **Exelon (Constellation Energy)**

*Business Development Manager*, July 2007 – October 2013

- Managed an extensive territory ranging to MD, PA, DC, CT, NY, IL, TX and NJ.
- Increased brand awareness and provided value to all customers.
- Implemented new energy software systems into large commercial real estate organizations in DC.
- Increased customer retention and brought additional customer awareness to their facilities, which resulted in increase in profitability.
- Sold a variety of technical solutions including electricity, natural gas, solar, energy efficiency, and demand response products to high-level market leading companies.

# Craig Tobe

1350 Magnolia Avenue, Annapolis, MD 21403 | (610) 551-2667  
[ctobe@zentility.com](mailto:ctobe@zentility.com) | [www.zentility.com](http://www.zentility.com)

## SUMMARY

---

CTO specializing in designing, organizing, building, growing and scaling systems. I've heavily contributed to the success of major applications at companies like eBay, Constant Contact, FINRA, NPR, American Red Cross, and many others across the finance, e-commerce, marketing, and media sectors.

## EDUCATION

---

Masters in computer science - Towson University

## WORK EXPERIENCE

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### **Zentility, Inc.**

Chief Technology Officer

September 2019 - Present

Co-founder of Zentility which is an automated energy procurement platform targeted at saving customers money.

### **BNY Mellon, Eagle Investment Systems**

Senior Principal Architect

August 2017 – September 2019

Greater Boston Area

Lead the organization and architected their next generation big data platform.

### **Constant Contact**

Performance Architect

May 2013 – August 2017

Greater Boston Area

Lead the organization in best practices for fine-tuning, scaling, optimizing their systems to support their 700,000+ users.

### **eBay Inc.**

Performance Architect

May 2010 – May 2013

Performance architect for their x-commerce platform used by millions of customers around the world.

### **FINRA**

Lead Engineer

July 2007 – May 2010

Rockville, MD

Engineer on the Web Integrated Audit Trail project which is a web-based application used to quickly search financial databases for the detection of illegal trading activity.

Previous companies: BAE Systems, NPR, Red Cross, Social Security Administration.



Attachment I

Affidavits

Please see next pages for Affidavits

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INFO@ZENTILITY.COM  443.710.1920

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Delaware

ss.

County of Kent

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

[He/she is the ~~owner~~ CTO (Office of Affiant) of Zentility, INC (Name of Applicant);]

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

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

That the Applicant herein Zentility, INC. has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

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

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Signature]  
Signature of Affiant

Sworn and subscribed before me this 12 day of May, 2020.

[Signature]  
Signature of official administering oath



Maureen E.K. White  
NOTARY PUBLIC  
Commonwealth of Massachusetts  
My Commission Expires  
October 16, 2029

My commission expires \_\_\_\_\_

Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Delaware

ss.

County of Kent

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

[He/she is the ~~Craig Tobe~~ CTO (Office of Affiant) of Zentility, INC. (Name of Applicant);]

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

That Zentility, INC., 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 Zentility, INC., 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 Zentility, INC., the Applicant herein, certifies to the Commission that it is subject to, will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 22 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28 shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional natural gas sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

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



**Appendix B (Continued)**

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

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

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

  
\_\_\_\_\_  
Signature of Affiant

Sworn and subscribed before me this 12 day of May, 2020.

  
\_\_\_\_\_  
Signature of official administering oath  
MAURICE E. WILK  
NOTARY PUBLIC  
Commonwealth of Massachusetts  
My Commission Expires  
October 16, 2025



My commission expires \_\_\_\_\_.



Attachment J

Notarized Publication Proofs

Please see next pages

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INFO@ZENTILITY.COM  443.710.1920

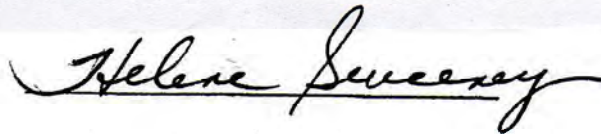
Proof of Publication in The Philadelphia Daily News  
Under Act. No 587, Approved May 16, 1929

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:

April 15, 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.

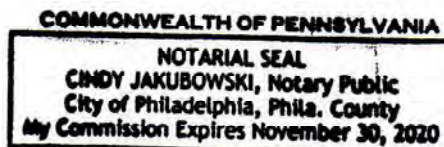


Sworn to and subscribed before me this 15th day of  
April, 2020.



Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE

Applications of **Zentility, INC** 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.

**Zentility, INC** 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. **Zentility, INC** 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. **Zentility, INC** proposes to sell electricity, natural gas, and related services in the entire commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Zentility, INC** 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 **Zentility, INC** at the address listed below.

Zentility, INC  
ATTN: Ryan Pesuch  
301 4th St, Po Box 20  
Annapolis, MD 21403  
877-936-8454

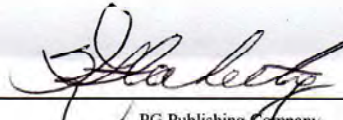
### Proof of Publication of Notice in Pittsburgh Post-Gazette

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

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

**16 of April, 2020**

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

  
\_\_\_\_\_  
PG Publishing Company

Sworn to and subscribed before me this day of:  
April 16, 2020

  
\_\_\_\_\_  
Elizabeth R. Chmura

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

**STATEMENT OF ADVERTISING COSTS**  
Zentility Inc.  
301 4th Street, PO Box 20  
Annapolis Maryland 21403

To PG Publishing Company


Total ----- \$496.00

### Publisher's Receipt for Advertising Costs

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

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

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

By  Samuel J. Arbutina

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

### COPY OF NOTICE OR PUBLICATION

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE  
Applications of Zentility, INC 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.  
Zentility, INC 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. Zentility, INC 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. Zentility, INC proposes to sell electricity, natural gas, and related services in the entire commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Zentility, INC 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 Zentility, INC at the address listed below.  
Zentility, INC  
ATTN: Ryan Pesuch  
301 4th St, Po Box 20  
Annapolis, MD 21403  
877-936-8454

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

ZENTILITY INC  
CASSANDRA HELLER  
301 4TH ST., PO BOX 20 ANNAPOLIS MD 21403

Account # 637521  
Order # 82436921  
Ad Price: 355.80

LEGAL NOTICE PENNSYLVANIA

Lisa Burke

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

04/15/2020

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

Sworn and subscribed to before me  
this 15th day of April A.D., 2020

Kathleen Weaver  
(Notary Public)

COMMONWEALTH OF PENNSYLVANIA  
NOTARIAL SEAL  
Kathleen Weaver, Notary Public  
City of Scranton, Lackawanna County  
My Commission Expires June 14, 2021



**LEGAL NOTICE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE**  
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301 4th St., PO Box 20  
Annapolis, MD 21403  
877-936-8454

**COMMONWEALTH OF PENNSYLVANIA** }  
*County of Cambria* } **SS**

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE**

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**Zentility, INC**  
**ATTN: Ryan Pesuch**  
**301 4th St, Po Box 20**  
**Annapolis, MD 21403**

publish  
that the  
of The  
in the  
of said

County of Cambria, and Commonwealth of Pennsylvania and  
 ove matter published in said publication in the regular issues  
 PA, on April 15, 2020; and that the Affiant is not interested  
 nd that all of the allegations as to time, place and character

On this 15th day of April A.D. 2020, before me, the subscriber, a Notary Public in and for said County and State, personally appeared **Christine Marhefka**, who being duly sworn according to law, deposes and says as **Sales Manager / Major Accounts of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,**

*Christine Marhefka*

**STATEMENT OF ADVERTISING COSTS**

Signed and sworn to before me on  
 15th day of April, 2020,  
 by Christine Marhefka making the statement.

*[Signature]*

0.00 Lines @ \$2.50 per line	0.00
7 Inches @ \$25.00 per inch	175.00
Notary Fee	5.00
Clerical Fee	2.50
<b>Total Cost</b>	<b>182.50</b>

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

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

**PUBLISHER'S RECEIPT FOR ADVERTISING COSTS**

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

\_\_\_\_\_  
 (Name of Newspaper)

By \_\_\_\_\_

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

STATE OF PENNSYLVANIA

COUNTY OF LYCOMING

SS:

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

April 16, 2020

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

**PENNSYLVANIA  
PUBLIC UTILITY  
COMMISSION  
NOTICE**

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Zentility, INC  
ATTN: Ryan Pesuch  
301 4th St, Po Box 20  
Annapolis, MD 21403  
877-936-8454

  
\_\_\_\_\_  
SUN-GAZETTE LLC

Sworn to and subscribed before me

The 21<sup>ST</sup> day of April 20 20

  
\_\_\_\_\_  
Danielle Miller  
Notary Public

COMMONWEALTH OF PENNSYLVANIA  
**NOTARIAL SEAL**  
Danielle Miller, Notary Public  
Lock Haven City, Clinton County  
My commission expires December 27, 2020

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:

For publishing the notice attached

Hereto on the above state dates.....\$ 285.64

Probated same.....\$

Total.....\$ 285.64

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

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

SUN-GAZETTE LLC

BY Robert O. Rolley, Jr.

PROOF OF PUBLICATION  
In  
THE ERIE TIMES-NEWS  
COMBINATION EDITION

Zentility Inc  
4 Rainbow Dr  
Midway MA 02053

REFERENCE: 150097 401440  
PUC Notice

STATE OF PENNSYLVANIA)  
COUNTY OF ERIE ) SS:

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

PUBLISHED ON: 05/01/20

TOTAL COST: \$610.00 AD SPACE: 0 Lines

FILED ON: 05/01/20

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE**

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**Zentility, INC**  
ATTN: Ryan Pesuch  
301 4th St, Po Box 20  
Annapolis, MD 21403  
877-936-8454

EP-401440

Sworn to and subscribed before me this 5th day of May 2020

Affiant: Lorri Stefanelli

NOTARY: Barbara J. Moore

Commonwealth of Pennsylvania - Notary Seal  
Barbara J. Moore, Notary Public  
Erie County  
My commission expires March 23, 2024  
Commission number 1114860  
Member, Pennsylvania Association of Notaries





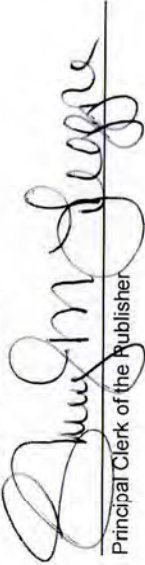
# The Patriot News LEGAL AFFIDAVIT

AD#: 0009579544

Commonwealth of Pennsylvania,) ss  
County of Cumberland)

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

**The Patriot News 04/21/2020**

  
Principal Clerk of the Publisher

Sworn to and subscribed before me this 21th day of April 2020

  
Notary Public

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

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE**

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Zentility, INC  
ATTN: Ryan Pesuch  
301 4th St, Po Box 20  
Annapolis, MD 21403  
877-934-9634



Attachment K Section 7 Item F

Tax Certification Statement

Is being filled separately due to Confidential Nature

THE NEW WAY TO TAKE CARE OF YOUR ENERGY

INFO@ZENTILITY.COM  443.710.1920



Attachment L Section 7 Item A

Bonding Letters

Please see next pages

THE NEW WAY TO TAKE CARE OF YOUR ENERGY

INFO@ZENTILITY.COM  443.710.1920



May 22, 2020

Ryan Puesch, CEO  
Zentility, INC  
301 4th Street, STE 20  
Annapolis, MD 21403

Dear Ryan Puesch, CEO:

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

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

If the creditworthiness requirement or Columbia Gas' exposure to Zentility, INC changes in the future, Columbia Gas might deem it appropriate to require Zentility, INC to provide a bond or other financial security instrument.

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

Sincerely,

*Kylia Davis*

Kylia Davis  
Manager of Choice and Transportation Support Services



**National Fuel**

May 26, 2020

Ryan Peusch, President  
Zentility, Inc.  
301 4th Street, Suite 20  
Annapolis, MD 21403

Dear Ryan,

National Fuel Gas Distribution Corporation (“NFGDC”) is aware Zentility, Inc. (ZI) has filed an application with the Pennsylvania Public Utility Commission to supply natural gas service to the public in Pennsylvania and specifically within the service territory of NFGDC.

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

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

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

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

Yours truly,

Nicole Barker  
Transportation Services Department



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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May 26, 2020

Mr. Ryan Peusch, CEO  
Zentility, INC.  
301 4<sup>th</sup> Street, STE 20  
Annapolis, MD 21703  
Email: [cheller@zentility.com](mailto:cheller@zentility.com)

Mailing Address:  
Cassandra Heller  
4 Rainbow Drive  
Medley, MA 02053

RE: Security Requirement Bond for Zentility, INC.

Dear Mr. Peusch,

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

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

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

Sincerely,

A handwritten signature in blue ink that reads "John Zuk".

JOHN ZUK  
Sr. Vice President, Gas Management

/dls



# VALLEY ENERGY

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

May 27, 2020

## VIA EMAIL

Cassandra Heller  
Director of Finance  
Zentility, Inc.  
301 4th St., Ste. 20  
Annapolis, MD 21403  
[cheller@zentility.com](mailto:cheller@zentility.com)

Dear Ms. Heller:

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

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

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

Sincerely,

Edward E. Rogers  
President & CEO

EER/ss

cc: J. Levering, Valley Energy

June 16, 2020

Zentility, INC.  
301 4th Street, Ste 20  
Annapolis, MD 21403

Re: Broker Requirements

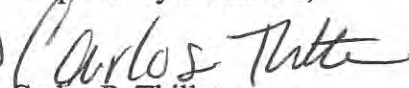
Dear Zentility, INC.

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

(AW) 

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





375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](http://www.peoples-gas.com)

**Carol Scanlon**  
Manager, Rates & Regulation

**Peoples Service Company LLC**  
Phone: 412-208-6931  
Email: [Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com)

May 22, 2020

Ryan Peusch  
CEO & President  
Zentiltiy, INC.  
301 4th St, STE 20  
Annapolis, MD 21403

Dear Mr. Peusch:

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

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

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

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

Sincerely,

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

Cc: Stephen Kelly  
Mina Speicher