

# PRUDENTIAL ENERGY

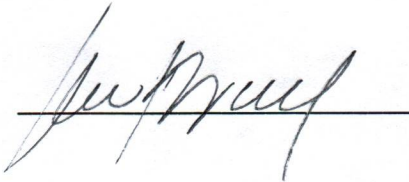
Kyle Bray, President  
Prudential Energy Services Corporation  
9225 Katy Freeway Ste. 204  
Houston, TX 77024

Docket No. A-2020-3021873  
Utility Code: 1223448

10/9/2020

Please see attached utility bonding letters.

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

A handwritten signature in cursive script, appearing to read 'Kyle Bray', is written over a horizontal line.



September 10, 2020

Kyle Bray  
Prudential Energy Services Corporation  
9225 Katy Freeway, Suite 204  
Houston, Texas 77024

Dear Kyle Bray:

We are pleased that Prudential Energy Services Corporation 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, Prudential Energy Services Corporation 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. Prudential Energy Services Corporation has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Prudential Energy Services Corporation 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 Prudential Energy Services Corporation changes in the future, Columbia Gas might deem it appropriate to require Prudential Energy Services Corporation 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



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)

September 25, 2020

Kyle Bray  
President  
Prudential Energy Services Corporation  
9225 Katy Freeway, Suite 204  
Houston, Texas 77024

Dear Mr. Bray:

We are pleased that Prudential Energy Services Corporation 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 Prudential Energy Services Corporation is not currently serving customers on the Peoples systems, we have determined at this time that Prudential Energy Services Corporation 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 Prudential Energy Services Corporation 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



# VALLEY ENERGY

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

September 11, 2020

**VIA EMAIL**

Prudential Energy  
Mr. Kyle Bray  
9225 Katy Freeway, Suite 204  
Houston, TX 77024  
[kyleb@prudentialenergy.com](mailto:kyleb@prudentialenergy.com)

Dear Mr. Bray:

We understand that Prudential Energy 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 Prudential Energy intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Prudential Energy 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 Prudential Energy 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



**National Fuel**

July 27, 2020

Kyle Bray, President  
Prudential Energy Services Corporation  
9225 Katy Freeway  
Houston, TX 77024

Dear Kyle,

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

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

October 7, 2020

Prudential Energy Services Corporation  
9225 Katy Freeway, Suite 204  
Houston, TX 77024

Re: Broker Requirements

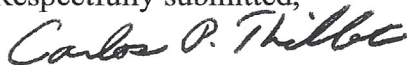
Dear Prudential Energy Services Corporation:

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

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

Respectfully submitted,

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

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



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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October 7, 2020

Mr. Kyle Bray, President  
Prudential Energy Services Corporation  
9225 Katy Freeway, Suite 204  
Houston, TX 77024  
Email: [kyleb@prudentialenergy.com](mailto:kyleb@prudentialenergy.com)

RE: Security Requirement Bond for Prudential Energy Services Corporation

Dear Mr. Bray:

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

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Prudential Energy Services Corporation does not need to post a bond or other form of security to operate in its service territory. If the services provided by Prudential Energy Services Corporation should change, Philadelphia Gas Works reserves the right to require security from Prudential Energy Services Corporation 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, appearing to read 'J. Zuk', is written over the typed name.

JOHN ZUK  
Sr. Vice President, Gas Management

/dls



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

610-796-3400

VIA E-MAIL

September 16, 2020

Prudential Energy  
9225 Katy Freeway  
Suite 204  
Houston, TX 77024

**ATTENTION: Kyle Bray, President**

**RE: Prudential Energy  
Application to Serve as a Natural Gas Broker**

Dear Mr. Bray,

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

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

Sincerely,

A handwritten signature in blue ink that reads 'Sherry Epler'.

Sherry Epler  
Senior Manager  
Tariff & Supplier Administration

SE/rks