



September 29, 2020

RECEIVED

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

SEP 30 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Secretary Chiavetta:

Attached please Paragon Advisors' application for a natural gas brokerage license. Please let me know if you have any questions or require any additional information:

Phone: (203) 245-9131
Fax: (203) 779-1050
Email: latorre@emailparagon.com

Thank you for your attention to the attached application.

Sincerely,

Thomas A. LaTorre
Principal

Copy to: (without confidential financials)

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

PECO
Carlos Thillet, Manager, Gas Supply and Transportation
2301 Market Street, S9-2
Philadelphia, PA 19103

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of **Paragon Advisors LLC**, for approval to offer, render, furnish, or supply natural gas supply services as a **Broker/Marketer** to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

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

Paragon Advisors LLC
Thomas LaTorre
PO Box 332
Madison CT 06443
(203) 245-9131
www.paragonenergyadvisors.com

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

- 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.

Corporation Service Company
2595 Interstate Drive
Suite 103
Harrisburg, PA 17110

- 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.

Paragon Advisors LLC
Thomas LaTorre
PO Box 332
Madison CT 06443
Phone: (203) 245-9131
Fax: (203)779-1050
www.paragonenergyadvisors.com
latorre@emailparagon.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 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.

Thomas LaTorre is the Principal and sole member of Paragon Advisors LLC. There are no other employees

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

X 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

Paragon Advisors LLC Application for Broker License for Natural Gas

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.

Paragon Advisors is registered with Department of State under entity# 3909569. See Attachment A.

- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.

Paragon Advisors LLC is organized in CT. See Attachment B for Articles of organization.

- Give name and address of officers.

Thomas LaTorre is the Principal and sole member of Paragon Advisors LLC. There are no other employees

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.

Paragon Advisors has no affiliates

- b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

Paragon Advisors has no predecessors

4. OPERATIONS

- a. **APPLICANT'S PRESENT OPERATIONS:** *(select and complete the appropriate statement)*

Definitions

- Supplier – an entity which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of a natural gas distribution company

Paragon Advisors LLC Application for Broker License for Natural Gas

- **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)

OR

- The Applicant is not presently doing business in Pennsylvania. (as a natural gas broker)**

Paragon Advisors is actively doing business in PA as a licensed electricity broker (A-2009-2137003) since

- 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.

Paragon Advisors has been helping large energy users manage their energy consumption and expenses for nearly 20 years. Paragon Advisors helps clients understand their energy profile and identify opportunities to help reduce their total energy costs through efficiency projects, curtailment programs such as demand response, capacity obligation reduction and the strategic use of electricity and natural gas supply options. Paragon Advisors educates clients on the national, regional and local drivers of energy costs and how best to interpret the fundamentals of supply and demand and their impact on energy commodity costs and client specific pricing. Paragon Advisors acts an advocate for clients to help them utilize all tools and resources available to them to manage their energy plans, consumption and cost. Paragon Advisors is licensed in many other states including CT, MA & MD and has been assisting Pennsylvania electricity users as a broker (A-2009-2137003) since 2010.

Specific to natural gas supply options, Paragon Advisors reviews various supply options including utility default service, third party suppliers and the contractual and strategic implications of various supply arrangements including swing parameters, fixed vs NYMEX based pricing, term lengths and other contractual considerations. In order to make an informed decision, Paragon Advisors reviews national and regional market dynamics that have an impact on current and future prices such as supply/demand trends, prompt-month and longer-term NYMEX strip prices, weather outlooks, weekly EIA inventory reports and other market intelligence.

Paragon Advisors LLC Application for Broker License for Natural Gas

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

- Columbia
- National Fuel Gas
- PECO
- Peoples Natural Gas Company
- Peoples Natural Gas – Equitable Div
- Peoples Gas Company
- Philadelphia Gas Works
- UGI Utilities – Gas Division
- Valley Energy
- 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.

Immediately upon issuance 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.

Paragon Advisors has never been a defendant of a criminal or civil proceeding

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

N/A

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.

No such actions

Paragon Advisors LLC Application for Broker License for Natural Gas

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

N/A

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)*

SEE 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>Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com</p>	
<p>Peoples Natural Gas Company LLC – Equitable Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577</p>	<p>National Fuel Gas Distribution Corp. Joanne E. Maciok 6363 Main Street Williamsville, NY 14221 PH: 716.857.7670 FAX: 716.857.7479 e-mail: maciokj@natfuel.com</p>

Paragon Advisors LLC Application for Broker License for Natural Gas

e-mail: Carol.Scanlon@peoples-gas.com	
Peoples Natural Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com	PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com
Peoples Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com	Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com
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	UGI Utilities, Inc. – Gas Division Sherry Epler 1 UGI Drive Denver, PA 17517 PH: 610.796.3447 Email: sepler@ugi.com

7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require. The contact information is located in Section 6.b.

Paragon Advisors is not a natural gas supplier, will not take title to any natural gas, be involved in client billing for natural gas services or have any impact on utility natural gas infrastructure or pool requirements. See Attachment C for bonding letter from PECO.

- 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.
Paragon Advisors has no affiliated or subsidiary companies
- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)
Paragon Advisors is a private LLC with no parent financials or credit information
- Applicant's accounting statements, including balance sheet and income statements for the past two years.
Income statements provided with confidentially notice

Paragon Advisors LLC Application for Broker License for Natural Gas

- 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.

Paragon Advisors is a private LLC and does not have a credit rating with any financial service organizations

- 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.

As a single member LLC Paragon Advisors does not have audited financial statements

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

- c. **SUPPLIER FUNDING METHOD:** If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.

N/A Paragon Advisors will operate as a Broker

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

Paragon Advisors either is paid or referral fee by the contracted supplier chosen by its clients or on occasion has a specific engagement fee it charges clients directly for all services provided.

- 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.

Paragon Advisors LLC
Thomas LaTorre
PO Box 332
Madison CT 06443
Phone: (203) 245-9131
Fax: (203)779-1050
latorre@emailparagon.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.

SEE Appendix D (Confidential)

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.

Paragon Advisors services are completely advisory in nature and will have no impact on the quality or availability of service provided by natural gas distribution companies.

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

- Applicant's previous experience in the natural gas industry.
Paragon Advisors has nearly 20 years of experience assisting over 100 clients in deregulated energy markets in CT, RI, MA and has been a licensed electricity broker (A-2009-2137003) in PA since 2010
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.

PA Electricity broker (A-2009-2137003)
MA Electricity broker (EB-092)
MA Natural Gas broker (RA-189)
CT Aggregator Registration (docket #06-10-15)
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
Paragon Advisors works with commercial and industrial electricity and natural gas users
- Staffing structure and numbers as well as employee training commitments.
Thomas LaTorre is the only member of Paragon Advisors
- Business plans for operations within the Commonwealth.

As stated in Section 4.C, Paragon Advisors will work with natural gas users within the Commonwealth in the following ways. Paragon Advisors has been helping large energy users manage their energy consumption and expenses for nearly 20 years. Paragon Advisors helps clients understand how they are using energy and identify opportunities to help reduce their total energy costs through efficiency projects, curtailment programs such as demand response, capacity obligation reduction and the strategic use of electricity and natural gas supply options. Paragon Advisors educates clients on the national, regional and local drivers of energy costs and how best to interpret the fundamentals of supply and demand and their impact on energy commodity costs and client specific pricing. Paragon Advisors acts an advocate for clients to help them utilize all tools and resources available to them to manage their energy profile, consumption and cost. Paragon Advisors is licensed in many other states including CT, MA & MD and has been assisting Pennsylvania electricity users as a broker (A-2009-2137003) since 2010.

Specific to natural gas supply options, Paragon Advisors reviews various supply options including utility default service, third party suppliers and the contractual and strategic implications of various supply arrangements including swing parameter, fixed vs NYMEX based pricing, term lengths and other contractual parameters. In order to make an informed decision, Paragon Advisors reviews national and regional market dynamics that have an impact on current and future prices such as supply/demand trends, prompt-month and longer-term NYMEX strip prices, weather outlooks, weekly EIA inventory reports and other market intelligence.

- 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**

Paragon Advisors LLC Application for Broker License for Natural Gas

- 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.

Paragon Advisors conducts very little marketing as the majority of its new clients come from referrals of existing clients. Any marketing that is conducted is done so solely by its Principal, Thomas LaTorre

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.

Tom LaTorre is the founder and principal of Paragon Advisors LLC, a firm that develops long-term strategic energy management and procurement strategies for large energy users. Tom is regularly sought out by clients and organizations to provide interpretation of the volatile energy market and offer guidance on procuring and managing energy in deregulated markets. Paragon Advisors advocates a holistic approach to energy management including disciplined hedging strategies and customer-side demand and load management practices and efficiency diligence. Paragon Advisors' clients have successfully managed volatile energy pricing, curtailed volumes, stabilized their energy costs and have saved hundreds of thousands of dollars in the process.

Prior to founding Paragon Advisors, Tom spent over 15 years in senior management positions at America Online (AOL) and AT&T. Tom has extensive experience in contract negotiation, business development, pricing management, strategic planning and P&L management.

As Vice President of External Affairs for AOL's Moviefone brand, Tom managed all business development and sales management for the online and telephony-based service that is the nation's largest movie listing guide and ticketing service. Tom and his teams negotiated, implemented and managed all partnership agreements and sales contracts with national movie theater chains. He

developed all pricing strategies and contract terms and conditions. Tom was responsible for evaluating and pursuing all domestic and international business ventures for the Moviefone brand and was a member of the Senior Leadership Team.

Prior to joining AOL, Tom was Regional Sales Director for AT&T's voice, video, data and internet solutions to corporate clients. With Tom's leadership his team of account managers throughout Connecticut & Western Massachusetts generated annual sales in excess of \$100 million. Tom negotiated all custom contracts, established pricing plans and managed all direct and indirect sales channels

While at AT&T's Network Systems Division (currently Lucent Technologies), he held strategic planning and product management positions. Tom lead a strategic planning organization responsible for long range planning and managing P&L responsibility for a business unit that generated over \$650M in annual sales. Previously, Tom was a product manager for AT&T responsible for all new product introduction activities for a state of the art fiber optic access system.

Tom graduated with honors from Bentley College with a B.S. in Marketing Management. He lives with his wife and two children in Madison, Connecticut where he is an active member of many civic organizations.

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.

N/A

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.

X 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 30th following the end of the calendar year per 52 Pa. Code § 62.110.

X AGREED

Paragon Advisors LLC Application for Broker License for Natural Gas

- 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.

SEE 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.

SEE 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

13. SIGNATURE

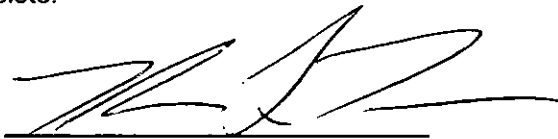
Applicant: 

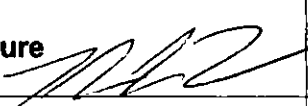
By: Thomas LaTorre

Title: Member

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: 

	Signature	
X	Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)	
X	Application Affidavit	Appendix A
X	Operations Affidavit	Appendix B
X	Proof of Publication	Attachment D
X	Tax Certification Statement	Appendix D
X	Commonwealth Department of State Verification	Attachment A
X	Certificate of Service	Appendix C

Applicant's Use

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

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SEP 30 2020

[Commonwealth/State] of Connecticut :

*Town of
Middletown*

ss.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

County of New Haven

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

[He/she is the Member (Office of Affiant) of Paragon Advisors LLC (Name of Applicant);]

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

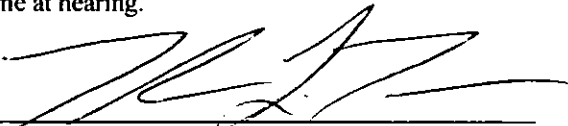
That the Applicant herein Paragon Advisors LLC has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

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

That the Applicant herein Paragon Advisors LLC 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 Paragon Advisors LLC 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 of Affiant

Sworn and subscribed before me this 30th day of September 2020



Signature of official administering oath

*Attorney M. Elizabeth Volpe
Commissioner of Court (991)*

My commission expires _____

Appendix B

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OPERATIONS AFFIDAVIT

SEP 30 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

[Commonwealth/State] of Connecticut :

SS.

County of New Haven :

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

[He/she is the Member (Office of Affiant) of Paragon Advisors LLC
(Name of Applicant);]

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

That Paragon Advisors LLC 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 Paragon Advisors LLC 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 Paragon Advisors LLC 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 **Paragon Advisors LLC** 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.

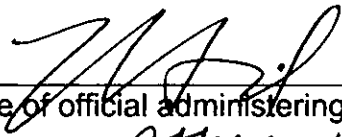
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the 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 30th day of **September 2020**



Signature of official administering oath
Attorney Michele Volpe

My commission expires ~~_____~~ Commission for Court (1991)

Appendix C

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

CERTIFICATE OF SERVICE TEMPLATE

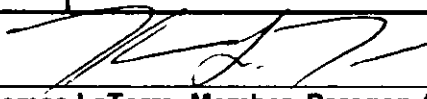
On this the 30th day of September 2020, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

<p>Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120</p>	<p>Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120</p>
<p>Office of the Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101</p>	<p>Department of Revenue Bureau of Compliance PO Box 281230 Harrisburg, PA 17128-1230</p>
<p>Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com</p>	<p>Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120</p>
<p>Peoples Natural Gas Company LLC – Equitable Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>National Fuel Gas Distribution Corp. Joanne E. Maciok 6363 Main Street Williamsville, NY 14221 PH: 716.857.7670 FAX: 716.857.7479 e-mail: maciokj@natfuel.com</p>
<p>Peoples Natural Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com</p>
<p>Peoples Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com</p>
<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</p>	<p>UGI Utilities, Inc. – Gas Division Sherry Epler 1 UGI Drive Denver, PA 17517 PH: 610.796.3447 Email: sepler@ugi.com</p>

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SEP 30 2020

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Thomas LaTorre, Member, Paragon Advisors LLC

Paragon Advisors LLC Application for Broker License for Natural Gas

Attachments on following pages:

- Attachment A: Paragon Advisors PA Department of State Status
- Attachment B: Paragon Advisors CT Articles of Organization
- Attachment C: PECO Bonding Letter
- Attachment D: Legal Notice Posting: I am still waiting for the affidavit from the Philadelphia Inquirer for proof of posting. Attached are a copy of the actual posting from the 9/09/20 edition and a copy of the paid receipt for the notice.
- Attachment E: Financial Summary (PROVIDED UNDER CONFIDENTIALY PROTECTION)

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Attachment A

Business Entity

<https://www.corporations.state.pa.us/corp/soskb/Corp.asp?2785018>



PENNSYLVANIA
Department of State

Corporations

[Online Services](#) | [Corporations](#) | [Forms](#) | [Contact Corporations](#) | [Business Services](#)

Search
By Business Name
By Business Entity ID
Verify
Verify Certification
Online Orders
Register for Online
Orders
Order Good Standing
Order Certified Documents
Order Business List
My Images
Search for Images

Business Entity Filing History

Date: 11/24/2009 (Select the link above
to view the Business
Entity's Filing History)

Business Name History

Name	Name Type
Paragon Advisors LLC	Current Name

Limited Liability Company - Foreign - Information

Entity Number: 3909569
Status: Active
Entity Creation Date: 10/5/2009
State of Business.: CT
Registered Office Address: % Corporation Service
Company
PA
Dauphin
Mailing Address: No Address

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SEP 30 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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Commonwealth of PA Privacy Statement

Attachment B

ARTICLES OF ORGANIZATION OF PARAGON ADVISORS LLC

The undersigned hereby forms a limited liability company under the Connecticut Limited Liability Company Act.

FIRST: The name of the limited liability company (the "Company") is Paragon Advisors LLC.

SECOND: The purposes to be promoted or carried out by the Company shall be to engage in any lawful act or activity for which limited liability companies may be formed under the Connecticut Limited Liability Company Act.

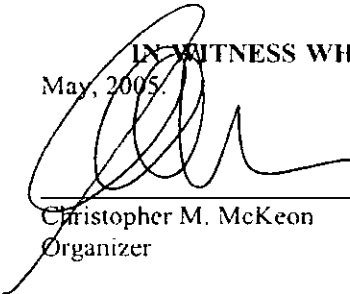
THIRD: The Agent for Service of Process for the Company shall be Christopher M. McKeon, 31 Hotchkiss Lane, Madison, Connecticut 06443 (residence); 59 Elm Street, Suite 405, New Haven, Connecticut 06510 (business).

FOURTH: The principal office of the Company shall be 170 Boston Post Road, Suite 105, Madison, Connecticut 06443.

FIFTH: Member information is as follows:

Name	Title	Residence Address	Business Address
Thomas LaTorre	Sole Member	377 Boston Post Road Madison, CT 06443	170 Boston Post Road, Suite 105, Madison, CT 06443

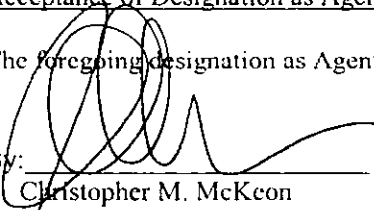
IN WITNESS WHEREOF, I have executed these Articles of Organization on this 13th day of May, 2005.



Christopher M. McKeon
Organizer

Acceptance of Designation as Agent for Service

The foregoing designation as Agent for Service of Process is hereby accepted:

By: 

Christopher M. McKeon

F:\Doc\Pers\Donna\LLC Docs\Formation\Art. Organization-Connecticut (Sole Member).doc

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SEP 30 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Office of the Secretary of the State of Connecticut

I, the Connecticut Secretary of the State, and keeper of the seal thereof,
DO HEREBY CERTIFY, that articles of organization for

PARAGON ADVISORS LLC

a domestic limited liability company, were filed in this office on May 13, 2005.

Articles of dissolution have not been filed, and so far as indicated by the records of this office such
limited liability company is in existence.



Secretary of the State

Date Issued: October 09, 2014

Business ID: 0821216

Standard

Certificate Number: 2014288722001

Note: To verify this certificate, visit the web site <http://www.concord.sots.ct.gov>

September 28, 2020

Paragon Advisors
781 Boston Post Road
PO Box 332
Madison, CT 06443

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SEP 30 2020

Re: Broker Requirements

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU


Dear Paragon Advisors:

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

 > Legal Notices

PENNSYLVANIA PUBLIC UTILITY C...



PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

Application of Paragon Advisors LLC (d/b/a "Paragon Advisors") For Approval To Offer, Render, or Furnish Natural Gas Services as a Supplier, Aggregator, or Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services, To The Public In The Commonwealth Of Pennsylvania.

Paragon Advisors LLC 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 or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. Paragon Advisors LLC proposes to sell natural gas and related services in PECO and Philadelphia Gas Works under the provisions of the new Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Paragon Advisors LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Paragon Advisors attorney at the address listed below.

Paragon Advisors LLC
PO Box 332
Madison, CT 06643
Phone (203) 245-9131
FAX (203) 779-1050

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SEP 30 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Ref# 0003428752-01

The Philadelphia Inquirer

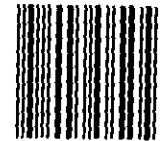
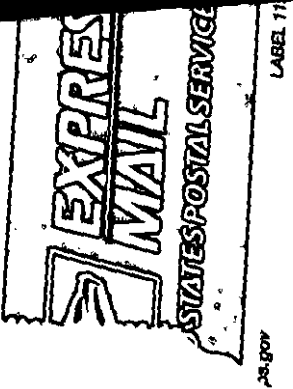
801 MARKET STREET, SUITE 300, PHILADELPHIA, PA 19107

Payment Receipt

Tuesday, September 08, 2020

Transaction Type: Payment
Order Number: 0003428752
Payment Method: Credit Card
Bad Debt: -
Credit Card Number: *****9245
Credit Card Expire Date: 6/28/2022
Payment Amount: 1,189.16
Reference Number: 05669G
Effective Date: 9/8/2020
Category: Classified
Credit to Transaction Number: P1139740
Invoice Text:
Invoice Notes:

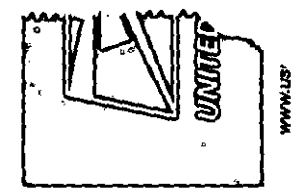
Customer Type: Transient
Customer Category:
Customer Status: Active
Customer Group: No Customer Group
Customer Trade:
Account Number: 600274909
Phone Number: 2032459193
Company / Individual: **Company**
Customer Name: PARAGON ADVISORS LLC
Customer Address: 781 Boston Post Road
Madison CT 06443 USA
Check Number:
Routing Number:



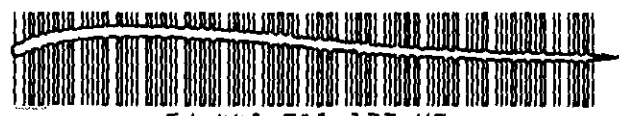
U.S. POSTAGE PAID
 P.M.E. 1-Day
 MADISON, CT
 06443
 SEP 30, 20
 AMOUNT
\$26.60
 R2304N118171-01

1007

17120



PRIORITY MAIL EXPRESS



EJ 448 711 133 US

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) PHONE: 203-245-9131

Person Advisors
 PO Box 332
 Madison, CT 06443

DELIVERY OPTIONS (Customer Use Only)

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

Delivery Options

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

TO: (PLEASE PRINT) PHONE: ()

PA Public Utility Commission
 Commonwealth Keystone Building
 400 North Street
 Harrisburg, PA 17120

ZIP + 4* (U.S. ADDRESSES ONLY)

PAYMENT BY ACCOUNT (If applicable)

USPS* Corporate Acct. No. Federal Agency Acct. No. or Postal Service** Acct. No.

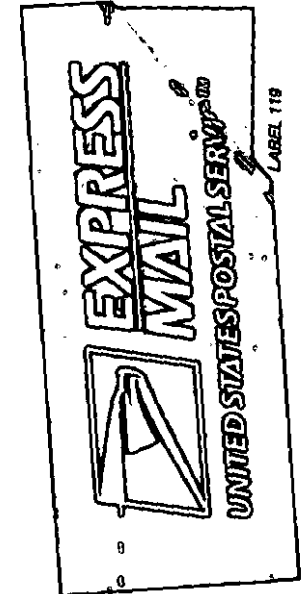
ORIGIN (POSTAL SERVICE USE ONLY)

1-Day 2-Day Military DPD

PO ZIP Code 06443	Scheduled Delivery Date (MM/DD/YY) 10/01/2020	Postage \$ 26.60
Date Accepted (MM/DD/YY) 9/30/2020	Scheduled Delivery Time <input type="checkbox"/> 10:30 AM <input type="checkbox"/> 3:00 PM <input checked="" type="checkbox"/> 2 NOON	Insurance Fee \$
Time Accepted 2:16 PM	10:30 AM Delivery Fee \$	Return Receipt Fee \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total Postage & Fees \$ 26.60
Weight 5.10 lbs. ozs.	Acceptance Employee Initials (Signature)	

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature
Delivery Attempt (MM/DD/YY)	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature



For pickup or delivery, visit USPS.com or call 800-222-1811.
 \$100.00

