

October 22, 2020

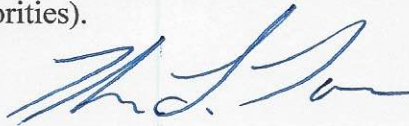
Pennsylvania Public Utility Commission  
Secretary Chiavetta  
400 North Street  
Keystone Building  
Harrisburg, PA 17120

Dear Secretary Chiavetta:

Attached please Paragon Advisors' response to the Commission's request for additional data for Docket A-2020-3022398. This information is being filed electronically (without confidential information) and also original hardcopy mailed. 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](mailto:latorre@emailparagon.com)

I, Thomas LaTorre, 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).



Docket No. A-2020-3022398  
Paragon Advisors LLC  
Data Requests

1. Reference Application, Section 4.d, Proposed Service Area – Applicant failed to provide a bonding letter for Philadelphia Gas Works. Please provide the missing documentation. **Response: Bonding Letter Attached**
2. Reference Application, Section 7.b, Financial Fitness – Applicant provided minimal documentation to demonstrate financial fitness. Please provide financial fitness documentation that may include two recent consecutive years of income tax filings or three recent consecutive months of bank statements. **Response: Three consecutive months of bank statements sent via US Mail. Provided under Confidentiality protection.**
3. Reference Application, Section 8.a, Technical Fitness – Applicant indicated that it is licensed to operate in Connecticut, Massachusetts and Maryland. Please provide copies of the licenses for these jurisdictions. **Response: Copies of licenses attached.**

4. Reference Application, Section 11, Application and Operations Affidavits – The Affidavits submitted are missing the notary stamps. Please resubmit the Affidavits officially stamped by a notary. **Response: Notarized Affidavits attached.**
  
5. Reference Application, Section 12, Notarized Proofs – Applicant provided proof of publication for the Philadelphia Inquirer. This publication is not an accepted publication per page 16, section 12 of the natural gas supplier application package found online at [https://www.puc.pa.gov/documents/utility-files/354/Gas\\_Lic\\_App.pdf](https://www.puc.pa.gov/documents/utility-files/354/Gas_Lic_App.pdf). To comply with section 12 of the application, please provide a notarized proof of publication for the Philadelphia Daily News. **Response: Paragon Advisors has been informed the legal posting with Philadelphia Inquirer will suffice. Notarized Proof of publication with Philadelphia Inquirer attached.**





**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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October 22, 2020

Mr. Thomas LaTorre  
Paragon Advisors LLC  
P.O. Box 332  
Madison, CT 06443  
Email: [latorre@emailparagon.com](mailto:latorre@emailparagon.com)

RE: Security Requirement Bond for Paragon Advisors LLC

Dear Mr. LaTorre:

Philadelphia Gas Works ("PGW") is aware that Paragon Advisors LLC has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works.

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

However, you have indicated, and it is Philadelphia Gas Works' understanding, that Paragon Advisors LLC intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services Paragon Advisors LLC will never take title to any delivered natural gas.

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Zuk", is positioned above the printed name.

JOHN ZUK

Sr. Vice President, Gas Management

/dls



THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

CHARLES D. BAKER  
GOVERNOR

KARYN E. POLITO  
LIEUTENANT GOVERNOR

KATHLEEN A. THEOHARIDES  
SECRETARY OF ENERGY  
AND ENVIRONMENTAL AFFAIRS

ONE SOUTH STATION  
BOSTON, MA 02110  
(617) 305-3500

MATTHEW H. NELSON  
CHAIR

ROBERT E. HAYDEN  
COMMISSIONER

CECILE M. FRASER  
COMMISSIONER

December 2, 2019

Thomas LaTorre, Principal Member  
Paragon Advisors  
781 Boston Post Rd., PO Box 332  
Madison, CT 06443

Dear Mr. LaTorre,

The Department of Public Utilities ("Department") has reviewed Paragon Advisors's ("Company") application for renewal of its **Electricity Broker License, EB-092**, and is pleased to inform you that the Company's application for renewal has been approved.

As a condition of maintaining this license, the Company must file updated information within 30 days of any material or organic change in the information required by 220 CMR 11.05(2), and must comply with all relevant requirements of G.L. c. 164, and the regulations promulgated thereunder, including 220 CMR 11.00, 12.00. Consistent with the information included with the Company's application, the activities the Company is licensed to provide are limited to electricity broker services to commercial and industrial customers. If, at a later date, the Company seeks to provide electricity broker services to residential customers, it must first seek and obtain Department approval at the time of renewal of its license. If the Company decides to request renewal of its license next year, please submit the renewal application no later than **January 1, 2021**. The renewal application is available at: <https://www.mass.gov/information-for-competitive-suppliers-and-electricity-brokers>.

Sincerely,

A handwritten signature in blue ink that reads "Cecile M. Fraser".

Cecile M. Fraser  
Delegated Commissioner





THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

CHARLES D. BAKER  
GOVERNOR

KARYN E. POLITO  
LIEUTENANT GOVERNOR

KATHLEEN A. THEOHARIDES  
SECRETARY OF ENERGY  
AND ENVIRONMENTAL AFFAIRS

ONE SOUTH STATION  
BOSTON, MA 02110  
(617) 305-3500

MATTHEW H. NELSON  
CHAIR

ROBERT E. HAYDEN  
COMMISSIONER

CECILE M. FRASER  
COMMISSIONER

October 31, 2019

Thomas LaTorre  
Paragon Advisors, LLC  
781 Boston Post Rd  
PO Box 332  
Madison, CT 06443

Mr. LaTorre,

The Department of Public Utilities has reviewed Paragon Advisors, LLC's ("Paragon") application renewal of its Gas Retail Agent license to serve commercial and industrial customers in the Commonwealth of Massachusetts. I am pleased to inform you that the application has been approved. Paragon's license number is RA-189.

As a condition of maintaining its license, Paragon must file updated information within 30 days of any material change in the information required by 220 CMR 14.04(2), and must comply with all relevant requirements of G.L. c. 164, and the regulations promulgated thereunder, including 220 CMR 12.00, 14.00. If you decide to request a renewal of Paragon's license next year, please submit a renewal application no later than October 1, 2020.

Sincerely,

A handwritten signature in black ink that reads "George Yankos".

George Yankos, Director, Gas Division

W. KEVIN HUGHES  
CHAIRMAN

HAROLD D. WILLIAMS  
LAWRENCE BRENNER  
ANNE E. HOSKINS  
JEANNETTE M. MILLS

## STATE OF MARYLAND



## PUBLIC SERVICE COMMISSION

#21, 7/22/15 AM; ML#s 166824 and 170506  
License Reference No.: IR-3504

July 22, 2015

Thomas LaTorre, Principal  
Paragon Advisors LLC  
781 Boston Post Road  
Box 332  
Madison, CT 06443

Dear Mr. LaTorre:

On April 10, 2015, Paragon Advisors, LLC ("Company") filed an Application for a License to Supply Electricity or Electric Generation Services in Maryland under COMAR 20.51. The Company proposes to provide electricity supplier services in Maryland for commercial and industrial customers as described in the application. Additional information was filed on July 7, 2015.

After considering this matter at the July 22, 2015 Administrative Meeting, the Commission granted the Company a license to supply electricity or electric generation services in Maryland (License Reference Number IR-3504). The license granted by the Commission under this Letter Order is limited solely to electricity supplier broker services for the customer classes and service territories applied for and recommended by Staff. Additionally, the Company is directed to provide marketing and training materials specific to its Maryland operations to the Commission Staff 30 days prior to commencing operations in Maryland.

Finally, the Company is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People's Counsel.

By Direction of the Commission,

A handwritten signature in blue ink that reads 'David J. Collins'.

David J. Collins  
Executive Secretary

DJC/st

cc: Phil VanderHeyden, Electricity Division  
Obi Linton, Director, External Relations

WILLIAM DONALD SCHAEFER TOWER • 6 ST. PAUL STREET • BALTIMORE, MARYLAND 21202-6806

410-767-8000 • Toll Free: 1-800-492-0474 • FAX: 410-333-6495  
MDRS: 1-800-735-2258 (TTY/Voice) • Website: [www.psc.state.md.us/pse/](http://www.psc.state.md.us/pse/)



# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL  
TEN FRANKLIN SQUARE  
NEW BRITAIN, CT 06051

**DOCKET NO. 06-10-15 APPLICATION OF PARAGON ADVISORS LLC FOR A  
CERTIFICATE OF REGISTRATION AS AN ELECTRIC  
AGGREGATOR**

December 6, 2006

By the following Commissioners:

Anthony J. Palermino  
Donald W. Downes  
John W. Betkoski, III

## **DECISION**

### **I. INTRODUCTION**

#### **A. SUMMARY**

In this Decision, the Department of Public Utility Control grants Paragon Advisors LLC an Electric Aggregator Certificate of Registration to serve commercial, industrial and municipal customers in Connecticut.

#### **B. BACKGROUND OF THE PROCEEDING**

By application filed October 9, 2006 (Application) pursuant to § 16-245(I) of the General Statutes of Connecticut (Conn. Gen. Stat.), Paragon Advisors LLC (Paragon or

Company) applied to the Department of Public Utility Control (Department) for a registration to operate as an electric aggregator within Connecticut.

### **C. CONDUCT OF THE PROCEEDING**

No Party requested a hearing. The Department determined that a hearing was not necessary in this matter; and thus, none was held. Conn. Gen. Stat. § 16-245(l)(4).

### **D. PARTIES TO THE PROCEEDING**

The Department recognized Paragon Advisors LLC, 170 Boston Post Road, Suite 105, Madison, Connecticut 06443; and the Office of Consumer Counsel, Ten Franklin Square, New Britain, Connecticut 06051, as Parties to the proceeding.

## **II. DEPARTMENT ANALYSIS**

Paragon proposed to serve commercial, industrial and municipal customers throughout Connecticut. Paragon's headquarters are located at 170 Boston Post Road, Suite 105, Madison, Connecticut 06443. The Company's main telephone number is 203-245-9131. Paragon is a limited liability company formed on May 13, 2005 in Connecticut. Its contact person for regulatory matters is Tom LaTorre. Application, p. 2. Paragon has no affiliates or subsidiaries. Application, Exhibit A-11. Paragon provided its 2006 Profit and Loss Statement along with a 2006 and 2007 budget. Response to Interrogatory EL-1.

Pursuant to Conn. Gen. Stat. § 16-245(l)(3), the Company disclosed that neither Paragon nor any of its officers are currently under investigation or have ever been fined, sanctioned or penalized in any state for violation of any consumer protection law or regulation. Application, A-14. Further, Paragon also affirmed that it will comply with the National Labor Relations Act and the Connecticut Unfair Trade Practices Act and applicable regulations. Application, Affidavit #2.

## **III. CONCLUSION AND ORDERS**

### **A. CONCLUSION**

After reviewing the Application, the Department grants Paragon a Certificate of Registration to provide electric aggregation services to commercial, industrial and municipal customers in the state of Connecticut. Paragon is reminded that it is under a continuing obligation to notify the Department of any changes to the information provided in the Application.

### **B. ORDERS**

1. Paragon shall provide the Department with any changes to its customer service practices, procedures, or policies in writing at least ten (10) business days prior to the effective date of such changes.



2. Paragon shall maintain its customer complaint records to indicate: (1) the date of the complaint; (2) the name and address of the complainant; (3) the address or location of the complaint; (4) a description of the complaint; and (5) a description of the resolution of the complaint.

**DOCKET NO. 06-10-15 APPLICATION OF PARAGON ADVISORS LLC FOR A  
CERTIFICATE OF REGISTRATION AS AN ELECTRIC  
AGGREGATOR**

This Decision is adopted by the following Commissioners:

Anthony J. Palermino

Donald W. Downes

John W. Betkoski, III

CERTIFICATE OF SERVICE

The foregoing is a true and correct copy of the Decision issued by the Department of Public Utility Control, State of Connecticut, and was forwarded by Certified Mail to all parties of record in this proceeding on the date indicated.

*Louise E. Rickard*

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Louise E. Rickard  
Acting Executive Secretary  
Department of Public Utility Control

December 6, 2006

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Date

Appendix A

APPLICATION AFFIDAVIT

[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 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 22<sup>nd</sup> day of October 2020.

  
Signature of official administering oath  
Jennifer L. O'Donnell  
Notary Public

My commission expires 11/30/2024



Appendix B

OPERATIONS AFFIDAVIT

[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 22<sup>nd</sup> day of October 2020.

  
\_\_\_\_\_  
Signature of official administering oath  
Jennifer L. O'Donnell  
Notary Public

My commission expires: 11/30/2024





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

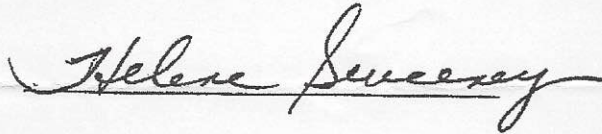
**STATE OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA**

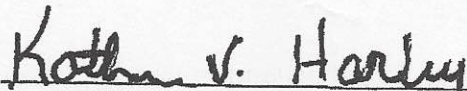
Helene Sweeney being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the 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:

September 10, 2020

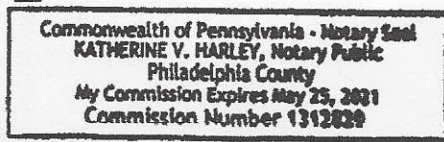
Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

Sworn to and subscribed before me this 10th day of September, 2020.



  
\_\_\_\_\_  
Notary Public

My Commission Expires:



**Copy of Notice of Publication**

**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 06843  
Phone (203) 245-9131  
FAX (203) 779-1050