

**H**awke  
  **M**ckeon &  
   **S**niscak LLP

**ATTORNEYS AT LAW**

Todd S. Stewart  
(717) 236-1300 x242  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

March 10, 2021

**VIA FEDERAL EXPRESS**  
**OVERNIGHT DELIVERY**

**RECEIVED**

MAR 10 2021

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

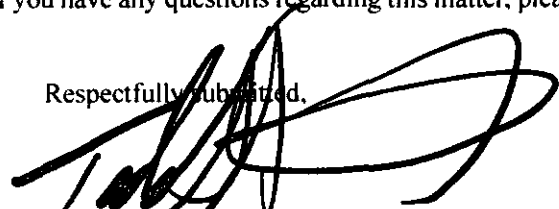
RE: Docket No. A-2021-\_\_\_\_\_ ; **CORRECTED LETTER TO APPLICATION OF SOUTHSTAR ENERGY SERVICES LLC D/B/A PENNSYLVANIA ENERGY (UTILITY CODE: 1221510) TO AMEND ITS NATURAL GAS SUPPLIER LICENSE TO INCLUDE THE SERVICE TERRITORIES OF PECO ENERGY, THE PHILADELPHIA GAS WORKS AND NATIONAL FUEL GAS DISTRIBUTION**

Dear Secretary Chiavetta:

It has come to my attention that the Cover Letter to the recently filed Application of SouthStar Energy Services LLC d/b/a Pennsylvania Energy to Amend its Natural Gas Supplier License to Include the Service Territories of PECO Energy, The Philadelphia Gas Works and Natural Fuel Gas Distribution (filed on March 5, 2021 via FedEx) had a comma in the "RE line after the word Services and in the signature line after the word Services." Enclosed for refileing with the Commission is a CORRECTED Letter removing those commas. Copies of the Letter have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions regarding this matter, please do not hesitate to contact me.

Respectfully submitted,



Todd S. Stewart  
Counsel for SouthStar Energy Services LLC d/b/a  
Pennsylvania Energy

TSS/jld  
Enclosures  
cc: Per Certificate of Service

 **Hawke**  
  **McKeon &**  
   **Sniscak LLP**  
**ATTORNEYS AT LAW**

Todd S. Stewart  
(717) 236-1300 x242  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

March 5, 2021

**VIA FEDERAL EXPRESS**  
**OVERNIGHT DELIVERY**

RECEIVED

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

MAR 10 2021  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

RE: Docket No. A-2021-\_\_\_\_\_ ; **APPLICATION OF SOUTHSTAR ENERGY SERVICES LLC D/B/A PENNSYLVANIA ENERGY (UTILITY CODE: 1221510) TO AMEND ITS NATURAL GAS SUPPLIER LICENSE TO INCLUDE THE SERVICE TERRITORIES OF PECO ENERGY, THE PHILADELPHIA GAS WORKS AND NATIONAL FUEL GAS DISTRIBUTION**

Dear Secretary Chiavetta:

The purpose of this letter is to request the expansion of the license of SouthStar Energy Services LLC d/b/a Pennsylvania Energy ("Pennsylvania Energy") to include the service territories of PECO Energy Company, The Philadelphia Gas Works and National Fuel Gas Distribution Company. On October 17, 2018, SouthStar Energy Services LLC d/b/a Pennsylvania Energy ("Pennsylvania Energy") filed an Application with the Pennsylvania Public Utility Commission ("Commission") seeking authority to act as a natural gas supplier ("NGS") in the Pennsylvania service territories of Columbia Gas of Pennsylvania, Peoples Natural Gas Company, LLC, Peoples Natural Gas Company, LLC – Equitable Division and Peoples Gas Company, LLC. By Order dated February 7, 2019, the Commission granted the requested authority.<sup>1</sup> On March 10, 2020, Pennsylvania Energy filed an application to expand its license to include the service territories of the then newly consolidated UGI affiliates. By Secretarial Letter issued April 1, 2020, that request was granted. Based upon the information provided herein, Pennsylvania Energy requests that its licensed territory be expanded as requested herein.

<sup>1</sup> See, *Application of SouthStar Energy Services LLC*, Docket No. A-201803995507, (Order entered February 7, 2019).

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
March 5, 2021  
Page 2

As the Commission is aware, Pennsylvania Energy is part of a corporate family encompassing over 200 entities (see **Attachment A** for the updated list), and as a result there is ongoing litigation and regulatory actions involving Pennsylvania Energy's parent and affiliates as disclosed in its most recent 10-K filings. However, there have been no material changes to the information disclosed in the most recent SEC filings with respect to litigation and/or regulatory actions, or structural organizational issues involving SouthStar.

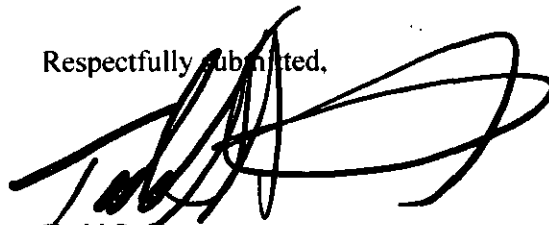
One change has occurred to the organizational information included in the initial License application, Shannon O. Pierce has been appointed to the position of Vice President for Growth and Chief of External Affairs.

The Commission's Regulations require that notice of this application be published in required newspapers. The proofs of publication for the newspapers listed by the Commission for the NGDC service territories herein requested, are attached as **Attachment B**.

Also attached is a check for \$350.00 for the filing fee and letters from National Fuel Gas Distribution, PECO Energy and the Philadelphia Gas Works, indicating that Pennsylvania Energy has satisfied their respective financial security requirements. (See, **Attachment C**)

Based upon the foregoing, Pennsylvania Energy respectfully requests that its natural gas supplier license be amended to include the service territories of PECO Energy, The Philadelphia Gas Works and National Fuel Gas Distribution.

Respectfully submitted,



Todd S. Stewart

*Counsel for SouthStar Energy Services LLC  
d/b/a Pennsylvania Energy*

TSS/jld  
Enclosures  
cc: Per Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that on this day I served a true and correct copy of the foregoing document upon the parties, listed below, in accordance with the requirements of §1.54 (relating to service by a party).

### VIA FIRST CLASS MAIL

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

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

Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101-1303

Office of Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 14<sup>th</sup> Floor  
Harrisburg, PA 17120

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

**RECEIVED**

MAR 10 2021

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

### VIA ELECTRONIC MAIL

Columbia Gas of Pennsylvania  
Transport Support Services  
290 W. Nationwide Blvd.  
Columbus, OH 43215  
[transportevaluations@nisource.com](mailto:transportevaluations@nisource.com)

Joanne E. Maciok  
National Fuel Gas Distribution Corp.  
6363 Main Street  
Williamsville, NY 14221  
[maciokj@natfuel.com](mailto:maciokj@natfuel.com)

Carol Scanlon  
Peoples Natural Gas Company, LLC  
225 North Shore Drive  
Pittsburgh, PA 15212  
[Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com)

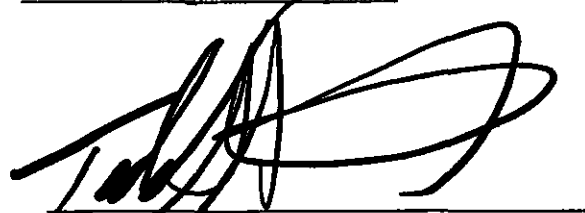
Carol Scanlon  
Peoples Gas Company, LLC  
225 North Shore Drive  
Pittsburgh, PA 15212  
[Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com)

Sherry Epler  
UGI Utilities, Inc. – Gas Division  
1 UGI Drive  
Denver, PA 17517  
[sepler@ugi.com](mailto:sepler@ugi.com)

Ed Rogers  
Valley Energy Inc.  
523 South Keystone Avenue  
Sayre, PA 18840-0340  
[erogers@ctenterprises.org](mailto:erogers@ctenterprises.org)

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

Carlos Thillet, Manager  
Gas Supply and Transportation  
PECO  
2301 Market Street, S9-2  
Philadelphia, PA 19103  
[Carlos.thillet@exeloncorp.com](mailto:Carlos.thillet@exeloncorp.com)

A handwritten signature in black ink, appearing to read 'Todd S. Stewart', is written over a horizontal line.

Todd S. Stewart

DATED: March 10, 2021

ORIGIN ID: IPTA (570) 425-3054  
TODD S. STEWART  
HAWKE MCKEON & SNISCAK LLP  
771 WINDING HOLLOW ROAD

SHIP DATE: 10MAR21  
ACTWGT: 1.00 LB  
CAD: 5875296/NET4340

HERNDON, PA 17830  
UNITED STATES US

BILL SENDER

TO **ROSEMARY CHIAVETTA, SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMM.  
400 NORTH STREET**

5K7ADPA03AFEA

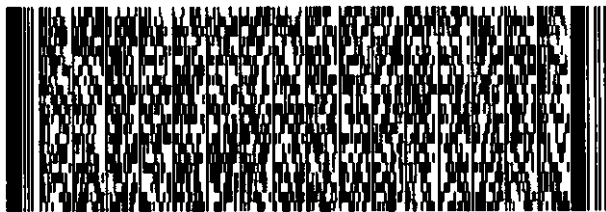
**HARRISBURG PA 17120**

(999) 999-9999

REF TSSALD 14080001

INV  
FD

DEPT



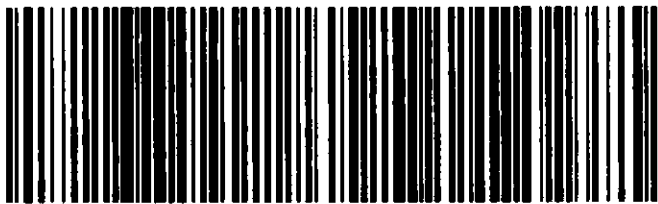
**THU - 11 MAR 10:30A  
PRIORITY OVERNIGHT**

TRK#  
0201

**7731 1948 5657**

**16 MDTA**

**17120  
PA-US MDT**



**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on [fedex.com](http://fedex.com). FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

**RECEIVED**

**MAR 18 2021**

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