

A-2021-3024519

Received by Sec Bureau via e-mail
on 3/10/21



February 17, 2021

Steven Moffitt
Palm Energy LLC
8901 Quality Rd
Bonita Springs, FL 34135

Dear Steven Moffitt:

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

A handwritten signature in cursive script that reads "Kyhia Davis".

Kyhia Davis
Manager of Choice and Transportation Support Services



VALLEY ENERGY

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

February 24, 2021

VIA EMAIL

Palm Energy LLC
regulatory@palmenergyllc.com

To Whom It May Concern:

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



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

610-796-3400

VIA E-MAIL

February 25, 2021

Palm Energy, LLC
8901 Quality Road
Suite 100
Bonita Springs, FL 34134

ATTENTION: Steven Moffitt, President

**RE: Palm Energy, LLC
Application to Serve as a Natural Gas Broker**

Dear Mr. Moffitt,

Based on your assertion that Palm Energy, LLC (“Palm Energy”) is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc.-Gas Division (“UGIU”) has concluded that Palm Energy will not need to post security with UGIU. This is based on the declaration that Palm Energy 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 Palm Energy 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,

Sherry Epler
Senior Manager
Tariff & Supplier Administration

SE/rks



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

2/24/2021

Mr. Steven Moffitt, President
8901 Quality Road
Bonita Springs, FL 34135

Email: regulatory@palmenergyllc.com

RE: Security Requirement Bond for Palm Energy LLC

Dear Mr. Moffitt

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

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Palm Energy LLC does not need to post a bond or other form of security to operate in its service territory. If the services provided by Palm Energy LLC should change, Philadelphia Gas Works reserves the right to require security from Palm Energy 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. C. Zuk', is written over a large, faint blue graphic of a flame or leaf shape that serves as a background for the signature area.

JOHN C. ZUK
Sr. Vice President, Gas Management

/dls



375 North Shore Drive
Pittsburgh, Pennsylvania 15212

www.peoples-gas.com

Carol Scanlon
Manager, Rates

Peoples Service Company LLC
Phone: 412-208-6931
Email: Carol.Scanlon@peoples-gas.com

March 5, 2021

Steven Moffitt
President
Palm Energy LLC
8901 Quality Rd
Bonita Springs FL 34135

Dear Mr. Moffitt:

We are pleased that Palm Energy LLC 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 Palm Energy LLC is not currently serving customers on the Peoples systems, we have determined at this time that Palm Energy LLC 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 Palm Energy LLC 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.

Sincerely,

Carol Scanlon
Manager, Rates
Peoples Natural Gas Company LLC

Cc: Stephen Kelly
Mina Speicher



An Exelon Company

March 9, 2021

Steven Moffitt
Palm Energy LLC
8901 Quality Rd
Bonita Springs, FL 34135

Re: Broker Requirements

Dear Palm Energy LLC:

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



National Fuel

February 23, 2021

Steve Moffitt, President
Palm Energy LLC
8901 Quality Road
Bonita Springs, FL 34135

Dear Steve,

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

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