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FEB 10 2021

8901 Quality Rd. Suite 100
Bonita Springs, FL 34134
1 (844) 397-2692
www.PalmEnergyLLC.com

1/28/2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Subject: Electric Generation Supplier (EGS) License Application (Broker/Marketer)

Dear Recipient:

Enclosed please find out completed EGS Application to act as a Broker/Marketer. This package includes the following:

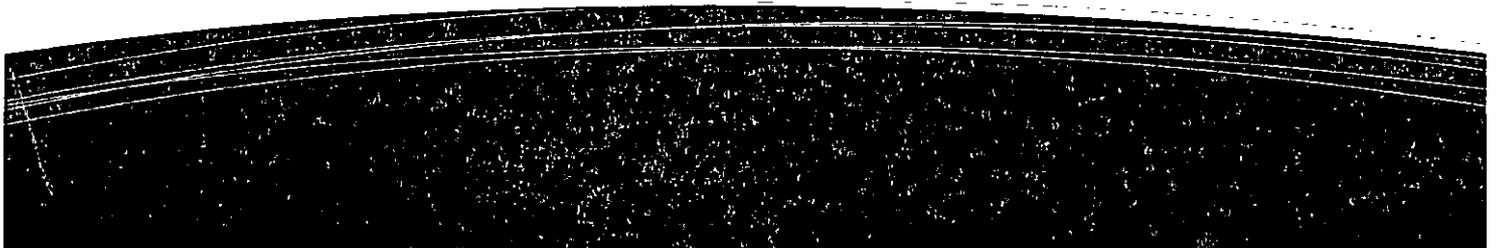
1. Completed and Signed Application
2. State of PA Entity Filing Application
3. State of PA Letter of Good Standing
4. Palm Energy LLC – Florida Charter Documents
5. Appendix C – Proof of Service
6. Letter of Credit (Copy) – Certified Copy has been sent separately (CONFIDENTIAL)
7. 2 Years of Financials (CONFIDENTIAL)
8. 3 Bank Statements (CONFIDENTIAL)
9. Letter of Responsibility (CONFIDENTIAL)
10. Tax Certificate
11. Supplemental Document for Technical Fitness (CONFIDENTIAL)
12. Steve Moffitt Resume in Support of Technical Fitness (CONFIDENTIAL)
13. Check for Application Fee - \$350
14. Appendix A
15. Appendix B
16. Notarized Affidavits for Proof of Publication

Upon review, if there are any questions or additional information required, please contact us. Thank you for your time and review.

Sincerely,

Steven Moffitt

Steven Moffitt
President
Palm Energy LLC
C: (713) 205-3174
E: Steve.Moffitt@PalmEnergyLLC.com



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FEB 10 2021

Version Revised 03/08/18

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Palm Energy LLC , d/b/a NA , for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) Broker/Marketer (no title to commodity) 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:

Palm Energy LLC
8901 Quality Rd
Bonita Springs, FL 34135

www.palmenergyllc.com

(239) 319-1193

- 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.

**CAPITOL CORPORATE SERVICES, INC.
125 LOCUST STREET HARRISBURG PA 17101
Phone: 800-345-4647
Fax: 800-432-3622**

- 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.

Steven Moffitt
President
Palm Energy LLC
regulatory@palmenergyllc.com
(239) 319-1193

- 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.

N/A – An attorney was not used to prepare this application

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** (Required of ALL Applicants) 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 Electric 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 EGSs.

Steven Moffitt
President
Palm Energy LLC
CustomerService@palmenergyllc.com
(239) 319-1193

Georgina Hill
Assistant to the President
8901 Quality Rd
Bonita Springs, FL 34135
(239) 319-1097
Georgina.Hill@palmenergyllc.com

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, Form PA-953.

OR

The Applicant will not be using a fictitious name.

Palm Energy LLC is NOT using a DBA in PA

- 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

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.

Approved state entity filing, and good standing document included with application.

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

Palm Energy LLC was formed in Florida. Attached is a copy of our charter documentation.

- Give name and address of officers.

**Steven Moffitt – President and Manager
James Richmond - Manager
Jeanne Richmond - Manager**

All located at:

**8901 Quality Rd
Bonita Springs, FL 34135**

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.

Palm Energy LLC is a subsidiary of E2Comply, LLC. Neither company is a utility.

- 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.

Not Applicable

4. OPERATIONS

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

Definitions

- Supplier – an entity that sells electricity to end-use customers utilizing the jurisdictional transmission and distribution facilities of an EDC.
- Aggregator - an entity that purchases electric energy and takes title to electric energy as an intermediary for sale to retail customers.
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of electric energy but does not take title to electric energy.

- The Applicant is presently doing business in Pennsylvania as a

- municipal electric corporation
- electric cooperative
- local gas distribution company
- provider of electric generation, transmission or distribution services
- broker/marketer engaged in the business of supplying electricity services
- Other; Identify the nature of service being rendered.

or

- The Applicant is not presently doing business in Pennsylvania.

- b. **APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a *(may check multiple)*:

- Generator of electricity
- Supplier of electricity
- Aggregator engaged in the business of supplying electricity
- Broker/Marketer engaged in the business of supplying electricity services
 - Check here to verify that your organization will not be taking title to the electricity nor will you be making payments for customers.
- Electric Cooperative and supplier of electric power
- Other (Describe):

c. **PROPOSED SERVICES:** Describe in detail the electric services or the electric generation services which the Applicant proposes to offer.

Below is a high level overview of the products and services Palm Energy intends to provide to customers:

1. **Resiliency Services – Palm Energy will provide distributed energy systems with the intention of solving customers power resiliency needs during outages from weather disturbances or other factors. Palm Energy will provide this solution through a Resiliency Agreement, which may involve brokering the customers power and/or gas supply. Palm Energy plans to provide this solution across North America in both regulated and deregulated energy markets.**
2. **Power and Gas Commodity Brokerage and Risk Management – Palm Energy’s primary focus will be to provide Reliability Services with power and gas commodity brokerage included within the scope of the Resiliency Agreement; however, to the extent customers are seeking discrete power and gas brokerage services from Palm, Palm may provide. Palm’s approach to providing discrete power and gas brokerage services is to do so with transparent fee structures whether that is through a consulting payment or an agreed-upon and documented usage based fee embedded in the power or gas rate.**
3. **Utility Bill Management Services – Palm Energy will provide utility bill management services including data and analytics.**
4. **Demand Response Services – Palm Energy will provide demand response and ancillary services to customers across North America. Accordingly, Palm has filed for the appropriate licenses in the pertinent jurisdictions.**

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

- Citizens' Electric
- Duquesne Light
- Met-Ed
- PECO
- Penelec
- Penn Power

- Pike
- PPL
- UGI Utilities
- Wellsboro
- West Penn

Entire Commonwealth of PA

e. **CUSTOMERS:** Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (25 kW and Under)
- Residential and Small Commercial as Mixed Meter ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)
- Large Commercial Customers - (Over 25 kW)
- 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.

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.

Applicant has no proceedings to list.

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

Not Applicable

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints, in the Commonwealth of Pennsylvania or any state, 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.

Applicant has no actions or complaints to list.

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

Applicant has no actions or complaints to list.

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)***

- 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:

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

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

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

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

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

- b. **EDCs:** 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 Electric 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 EDC is as follows.

Pike County Light & Power Company:
Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

West Penn:
Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

PECO:
Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Duquesne Light:
Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

PPL:
Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

Met-Ed, Penelec, and Penn Power:
Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

UGI:
UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

Citizens' Electric Company:
Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Wellsboro Electric Company:
Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2809(c)(1)(i), the Applicant is required to file a bond or other instrument to ensure its financial responsibilities and obligations as an EGS. Therefore, the Applicant is...

Furnishing the ORIGINAL of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$250,000.

- Furnishing the **ORIGINAL** of another initial security for Commission approval, to ensure financial responsibility, such as a parental guarantee, in the amount of \$250,000.
- For Marketers and Brokers** - Filing for a modification to the \$250,000 requirement and furnishing the **ORIGINAL** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$10,000. Applicant is required to provide information supporting an amount less than \$250,000. Such supporting information must include indication that the Applicant will not take title to electricity and will not pay electricity bills on behalf of its customers. Further details for modification may be described as well.

CRITICAL BONDING NOTES:

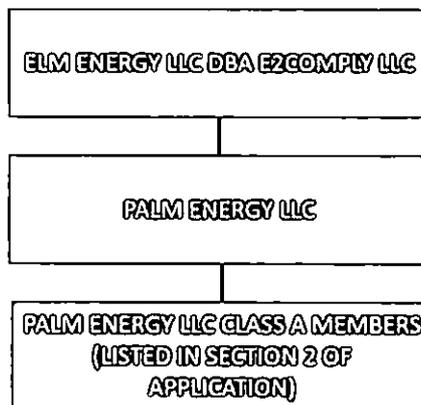
Applicant is required to maintain a bond or other financial instrument the entire time it maintains an EGS license with the Commonwealth of Pennsylvania. If Applicant's security instrument is not continuous, Applicant **MUST** submit a Rider, Amendment, or Continuation Certificate annually based on the expiration date of its security instrument.

At least sixty days (60) prior to the security instrument's expiration date, Applicant should contact Stephen Jakab at sjakab@pa.gov to determine the appropriate bonding amount based on a percentage of Applicant's gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. Once the amount has been determined, Applicant should overnight the updated security instrument(s) at least thirty (30) days prior to the expiration date to ensure adequate time for staff review and approval of the security instrument(s).

Template versions of a continuous bond, fixed-term bond, continuous letter of credit, and parental guarantee are attached at Appendix E, F, G, & H, respectively. Applicant's security must follow language from these examples, and must include the unmodified language outlined in Appendix D. Any deviation from these examples must be identified in the application and may not be acceptable to the Commission.

- 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.



TO SATISFY THE BELOW INFORMATION REQUESTS, PALM HAS FURNISHED THE FOLLOWING, PER THE RECOMMENDATION OF COMMISSION STAFF:

1. 2 YEAR(S) FINANCIALS FOR PARENT COMPANY
2. 3 RECENT BANK STATEMENTS
3. LETTER OF RESPONSIBILITY

- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)
- Applicant's accounting statements, including balance sheet and income statements for the past two years.
- 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.
- 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.
- 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.

NOT APPLICABLE AS APPLICANT WILL BE OPERATING AS A BROKER/MARKETER ONLY

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

Palm Energy LLC will be compensated in one of two ways:

- 1. A discrete \$/MWh broker fee embedded within electricity rate**
- 2. A discrete consulting fee which Palm will invoice Customer for, and Customer will pay directly to Palm.**

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.

Eric Clark
 Controller
 Eric.Clark@e2comply.com
 309-678-0200
 2116 W Townline Rd
 Peoria, IL 61615

f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix I 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.

8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by electric utilities does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

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

FOR THIS SECTION PLEASE REFER TO SUPPLEMENTAL DOCUMENT ENTITLED "SUPPLEMENTAL INFORMATION"

- Applicant's previous experience in the electricity industry.
- Summary and proof of licenses as a supplier of electric services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.
- 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 EGS – Applicant will contract with a PUC **LICENSED EGS** broker/marketer
- Affiliate – Applicant will use a **NON-EGS** affiliate marketing company and or individuals.
- External Third-Party – Applicant will contract with a **NON-EGS** third party marketing company and or individuals
- 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.

Prospecting and Sales are led by Senior Utility Leaders. Sales collateral and tools are prepared by the operational team in PDF form so they cannot be manipulated. Broker margin is reviewed and approved by non-sales leaders, and margin levels above certain thresholds are escalated for approval by the President of the business. New marketing material is approved by the President of the business. Operative documents including Risk Management policies are adhered to by all staff. Our interest is to grow a business using the strength of our integrity and network and our reputation is very important.

- 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.

**Steven Moffitt
President
Palm Energy LLC**

Resume included with application

- f. **FERC FILING:** Applicant has:

- Filed an Application with the Federal Energy Regulatory Commission to be a Power Marketer.
- Received approval from FERC to be a Power Marketer at Docket or Case Number _____.
- Not applicable

9. DISCLOSURE STATEMENTS:

Disclosure Statements: If proposing to serve Residential and/or Small Commercial (under 25 kW) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix J to this Application.

- Electricity 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.

Not applicable for an applicant applying for a license exclusively as a broker/marketer.

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **PJM LOAD SERVING ENTITY REQUIREMENT:** As a prospective EGS, the applicant understands that those EGSs which provide retail electric supply service (i.e. takes title to electricity) must provide either:
- proof of registration as a PJM Load Serving Entity (LSE), or

- proof of a contractual arrangement with a registered PJM LSE that facilitates the retail electricity services of the EGS.

The Applicant understands that compliance with this requirement must be filed within 120 days of the Applicant receiving a license. As well, the Applicant understands that compliance with this requirement may be filed with this instant application.

(Select only one of the following)

- AGREED - Applicant has included compliance with this requirement in the instant application, labeled in correspondence with this section (10).
- AGREED - Applicant will provide compliance with this requirement within 120 days of receiving its license
- ACKNOWLEDGED - Applicant is not proposing to provide retail electric supply service at this time, and therefore is not presently obligated to provide such information

- b. 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 § 54.43, as well as any future amendments.

AGREED

- c. REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission or the Department of Revenue, as appropriate:

- Retail Electricity Choice Activity Reports: The regulations at 52 Pa. Code §§ 54.201--54.204 require that all active EGSs report sales activity information. An EGS will file an annual report reporting for customer groups defined by annual usage. Reports must be filed using the appropriate report form that may be obtained from the PUC's Secretary's Bureau or the forms officer, or may be down-loaded from the PUC's internet web site.
- Reports of Gross Receipts: Applicant shall report its Pennsylvania intrastate gross receipts to the Commission on a quarterly and year to date basis no later than 30 days following the end of the quarter.
- The Treasurer or other appropriate officer of Applicant shall transmit to the Department of Revenue by March 15, an annual report, and under oath or affirmation, of the amount of gross receipts received by Applicant during the prior calendar year.
- Net Metering Reports: Applicant shall be responsible to report any Net Metering per the Standards on http://www.puc.pa.gov/consumer_info/electricity/alternative_energy.aspx. Scroll down to the Net Metering Standards Section.
- Applicant shall report to the Commission the percentages of total electricity supplied by each fuel source on an annual basis per 52 Pa. Code § 54.39(d).
- Applicant will be required to meet periodic reporting requirements as may be issued by the Commission to fulfill the Commission's duty under Chapter 28 pertaining to reliability and to inform the Governor and Legislature of the progress of the transition to a fully competitive electric market.

AGREED

d. **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. Section 2809(D). Transferee will be required to file the appropriate licensing application.

AGREED

e. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling electricity in the Commonwealth of PA, and an annual supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.

ACKNOWLEDGED

f. **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 § 54.34.

AGREED

g. **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

h. **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 twenty (20) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 54.34.

AGREED

i. **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

j. **Electronic Data Interchange:** The Applicant acknowledges the Electronic Data Interchange (EDI) requirements and the relevant contacts for each EDC, as listed at Appendix M.

AGREED

k. **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

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.

SIGNED AND NOTARIZED APPLICATION INCLUDED HEREIN

- b. **OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the reliability protocols of the North American Electric Reliability Council, the appropriate regional reliability council(s), and the Commission, and that you agree to comply with the operational requirements of the control area(s) within which you provide retail service. An example copy of this Affidavit can be found at Appendix B.

SIGNED AND NOTARIZED APPLICATION INCLUDED HEREIN

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 EDC. For example, an applicant that wants to operate in Penn Power 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
Citizens' Electric						X	
Duquesne				X			
Met Ed		X	X		X		
PECO			X				
Penelec	X	X			X	X	X
Penn Power	X			X			
Pike					X		
PPL		X	X		X	X	
UGI					X		
Wellsboro						X	
West Penn		X		X		X	X

Entire Commonwealth	X	X	X	X	X	X	X
---------------------	---	---	---	---	---	---	---

(Example Publications are provided at Appendices K and L)

13. SIGNATURE

Applicant: Palm Energy LLC

By: *[Signature]*

Title: President

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 are complete.

Applicant: Palm Energy LLC

✓	Signature	✓
✓	Filing Fee (CERTIFIED CHECK OR MONEY ORDER ONLY)	✓
✓	Application Affidavit	✓
✓	Operations Affidavit	✓
✓	Proof of Publication	✓
✓	Bond, Letter of Credit, or Parental/Affiliate Guarantee	
✓	Tax Certification Statement	✓
✓	Commonwealth Department of State Verification	✓
✓	Certificate of Service	✓

Applicant's Use

PUC Secretary's Bureau Use

PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

RETURN PER INSTRUCTIONS ON EXPEDITE FORM	Foreign Registration Statement DSCB:15-412 (rev. 2/2017)
	TCO201102DD0442

Read all instructions prior to completing. This form may be

Fee: \$250 I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):

- | | | |
|---|--|---|
| <input type="checkbox"/> Business Corporation | <input type="checkbox"/> Limited Partnership | <input type="checkbox"/> Business Trust |
| <input type="checkbox"/> Nonprofit Corporation | <input type="checkbox"/> Limited Liability (General) Partnership | <input type="checkbox"/> Professional Association |
| <input checked="" type="checkbox"/> Limited Liability Company | <input type="checkbox"/> Limited Liability Limited Partnership | |

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:

Palm Energy LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation is: Florida

4. The street and mailing address of the association's principal office.

<u>8901 Quality Rd</u>	<u>Bonita Springs</u>	<u>FL</u>	<u>34135</u>
Number and street	City	State	Zip

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association's jurisdiction of formation in that jurisdiction:

<u>8901 Quality Rd</u>	<u>Bonita Springs</u>	<u>FL</u>	<u>34135</u>
Number and street	City	State	Zip

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FEB 10 2021

PA DEPT OF STATE

NOV 02 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

5. The (a) address of the association's proposed registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) OR (b) - not both:

(a) _____
 Number and street City OR State Zip County

(b) c/o: Capitol Corporate Services, Inc. Dauphin
 Name of Commercial Registered Office Provider County

6. Check one of the following:

- The association may not have series.
- The association may have one or more series.

7. Effective date of registration of foreign association (check, and if appropriate complete, one of the following):

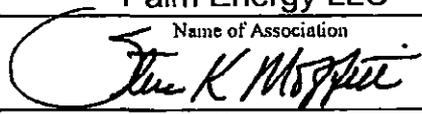
- The Foreign Registration Statement shall be effective upon filing in the Department of State.
- The Foreign Registration Statement shall be effective on: _____ at _____
 Date (MM/DD/YYYY) Hour (if any)

8. To be completed by Limited Liability Companies only. Check, and if appropriate complete, one of the following:

- The association is a limited liability company which is not organized to render any of the below professional service(s).
- The association is a restricted professional limited liability company organized to render one or more of the following professional service(s): (If this box is checked, one or more of the fields below must be checked.)

Chiropractic Dentistry Law Medicine and surgery
 Optometry Osteopathic medicine and surgery Podiatric medicine Public accounting
 Psychology Veterinary medicine

IN TESTIMONY WHEREOF, the undersigned association has caused this Foreign Registration Statement to be signed by a duly authorized representative thereof this _____ day of _____, 20_____.

Palm Energy LLC
 Name of Association

 Signature Steven Moffitt
President
 Title

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE

11/02/2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

I DO HEREBY CERTIFY THAT,

Palm Energy LLC

is duly registered to do business under the laws of the Commonwealth of Pennsylvania and remains a registered Foreign Limited Liability Company so far as the records of this office show, as of the date herein.

I DO FURTHER CERTIFY THAT this Certificate of Registration shall not imply that all fees, taxes and penalties owed to the Commonwealth of Pennsylvania are paid.



IN TESTIMONY WHEREOF, I have hereunto set
my hand and caused the Seal of the Secretary's
Office to be affixed, the day and year above written

Katly Bockman

Secretary of the Commonwealth

Certification Number: TSC201102181867-1

Verify this certificate online at <http://www.corporations.pa.gov/orders/verify>

State of Florida



Department of State

I certify the attached is a true and correct copy of Articles of Organization of PALM ENERGY LLC, a limited liability company, organized under the laws of the State of Florida, filed on February 13, 2020, effective February 12, 2020, as shown by the records of this office.

The document number of this company is L20000050509.

Given under my hand and the
Great Seal of the State of Florida
at Tallahassee, the Capital, this the
Sixteenth day of October, 2020



Laurel M. Lee

Laurel M. Lee

Secretary of State

**Electronic Articles of Organization
For
Florida Limited Liability Company**

L20000050509
FILED 8:00 AM
February 13, 2020
Sec. Of State
thampton

Article I

The name of the Limited Liability Company is:

PALM ENERGY LLC

Article II

The street address of the principal office of the Limited Liability Company is:

8901 QUALITY ROAD
BONITA SPRINGS, FL. US 34135

The mailing address of the Limited Liability Company is:

8901 QUALITY ROAD
BONITA SPRINGS, FL. US 34135

Article III

Other provisions, if any:

ANY AND ALL LAWFUL PURPOSES

Article IV

The name and Florida street address of the registered agent is:

CONA LAW PLLC
3785 AIRPORT ROAD
SUITE C
NAPLES, FL. 34105

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: CHRIS CONA

Article V

The name and address of person(s) authorized to manage LLC:

Title: MGR
JAMES RICHMOND
8901 QUALITY ROAD
BONITA SPRINGS, FL. 34135 US

Title: MGR
JEANNE RICHMOND
8901 QUALITY ROAD
BONITA SPRINGS, FL. 34135 US

L20000050509
FILED 8:00 AM
February 13, 2020
Sec. Of State
thampton

Article VI

The effective date for this Limited Liability Company shall be:

02/12/2020

Signature of member or an authorized representative

Electronic Signature: CHRIS CONA

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

Appendix A

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APPLICATION AFFIDAVIT

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

[Commonwealth/State] of Florida :

ss.

County of Lee :

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

[He/she is the President (Office of Affiant) of Palm Energy LLC (Name of Applicant);]

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

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

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

That the Applicant herein Steven Moffitt 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 Steven Moffitt 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.

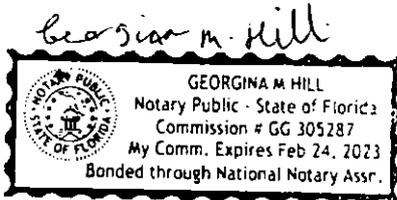
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

Steven K Moffitt
Signature of Affiant

Sworn and subscribed before me this 5th day of January 2021.

Georgina M. Hill
Signature of official administering oath

My commission expires Feb 24, 2023.



Appendix B

OPERATIONS AFFIDAVIT

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[Commonwealth/State] of Florida :

PA PUBLIC UTILITY COMMISSION
SS. SECRETARY'S BUREAU

County of Lee :

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

[He/she is the President (Office of Affiant) of Palm Energy LLC (Name of Applicant);]

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

That Steven Moffitt, 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 Steven Moffitt, 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 Steven Moffitt, 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 Steven Moffitt, 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.

Steven K Moffitt
Signature of Affiant

Sworn and subscribed before me this 5th day of January, 2021.

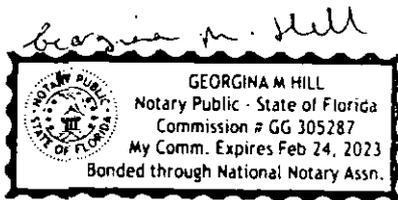
Georgina M. Hill
Signature of official administering oath

My commission expires Feb. 24, 2023.

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FEB 10 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



TIMES PUBLISHING COMPANY

TIMES SQUARE
 205 W. 12th STREET
 ERIE, PENNSYLVANIA 16534-0001
 TEL: (814) 870-1600 FAX: (814) 870-1814
 INVOICE

BILLING PERIOD 1/16/2021 - 1/16/2021	ADVERTISER/CLIENT NAME Palm Energy LLC
TOTAL AMOUNT DUE \$0.00	UNAPPLIED AMOUNT
TERMS OF PAYMENT DUE UPON RECEIPT	

PAGE # 1	BILLING DATE 01/16/2021	INV # 27230	BILLED ACCOUNT NAME AND ADDRESS Palm Energy LLC 8901 Quality Rd Bonita Springs, FL 34135	REMITTANCE ADDRESS TIMES PUBLISHING COMPANY P.O. BOX 6137 ERIE, PA 16512-6137
BILLED ACCT # 151208				

Erie Times-News | GOERIE

PLEASE DETACH AND RETURN UPPER PORTION WITH YOUR REMITTANCE

DATE	PO Number	AD#	DESCRIPTION	SIZE	RATE	AMOUNT	NET
1/13/2021		423877	Legal cr card AMEX payment				-409.00
1/16/2021		423877	LEGAL / PUC Notice	2 x 3.00	67.00	409.00	409.00

PLEASE PAY THIS AMOUNT ==> \$0.00

INVOICE NUMBER	BILLING PERIOD	BILLED ACCOUNT NUMBER	ADVERTISER/CLIENT NAME
27230	1/16/2021 - 1/16/2021	151208	Palm Energy LLC

TO ENSURE PROPER CREDIT TO YOUR ACCOUNT:

1. Allow 3 days for mail payments.
2. Make check or money order payable to **TIMES PUBLISHING COMPANY**
DO NOT MAIL CASH
3. Make sure your name and account number appear on your check or money order.
4. Mail your payment and the stub above in the pre-addressed envelope provided.

Classifieds Work!

www.goerie.com/classifieds
 Call: (814) 456-7021

Classified Email: classify@timesnews.com
 Legals Email: legals@timesnews.com

Questions about your bill?	(814) 870-1617
To place a classified ad	(814) 456-7021
For home newspaper delivery	(814) 453-4691

PROOF OF PUBLICATION
in
THE ERIE TIMES-NEWS
COMBINATION EDITION

Palm Energy LLC
8901 Quality Rd
Bonita Springs FL 34135

REFERENCE: 151208 423877
PUC Notice

STATE OF PENNSYLVANIA)
COUNTY OF ERIE) SS:

Lorri Stefanelli, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 01/16/21

TOTAL COST: \$409.00 AD SPACE: 0 Lines

FILED ON: 01/16/21

**NOTICE OF APPLICATION FOR EGS AND
NGS BROKER LICENSE IN PA**

Palm Energy LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide both electricity and natural gas supply services as a broker/marketer. Palm Energy will provide these services to Businesses in The Commonwealth of Pennsylvania. Palm Energy LLC proposes to broker electricity and related services in Citizens' Electric, Duquesne Light, Met-Ed, PECO, Penelec, Penn Power, Pike, PPL, UGI Utilities, Wellsboro, and West Penn EDC's. Palm Energy LLC proposes to sell natural gas in Columbia, National Fuels Gas, PECO, People Natural Gas Territories, Peoples Gas Company, Philadelphia Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Division, and Valley Energy Natural Gas Distribution Service Territories. Palm Energy LLC will operate under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation, Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Palm Energy 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 Palm Energy's address: Palm Energy LLC, 8901 Quality Rd., Bonita Springs, FL 34135 P:(239) 319-1097

EP423877

Sworn to and subscribed before me this 25th day of January 2021

Affiant: Lorri Stefanelli

NOTARY: Barbara Moore

Commonwealth of Pennsylvania - Notary Seal
Barbara J. Moore, Notary Public
Erie County
My commission expires March 23, 2024
Commission number 1114860
Member, Pennsylvania Association of Notaries

PA Media Group
1900 Patriot Dr
Mechanicsburg, PA 17050



The Patriot News

PALM ENERGY
8901 QUALITY RD
BONITA SPRINGS, FL 34135

AD#: 0009849951

Sales Rep: Marianna Aldridge
Account Number: 1000930748
AD#: 0009849951

Remit Payment to:
PA Media Group
Dept 77571
P.O. Box 77000
Detroit, MI 48277-0571

Page 1 of 2

Date	Position	Description	P.O. Number	Ad Size	Costs
01/14/2021	Misc Legal Notice PA	NOTICE OF APPLICATION FOR EGS AND NGS BROKER LICENSE IN PA		1 x 41 L	
				Affidavit Notary Fee - 01/14/2021	\$5.00
				Basic Ad Charge - 01/14/2021	\$193.87
				Total	\$198.87

FOR QUESTIONS CONCERNING THIS AFFIDAVIT, PLEASE CALL 717-255-8119



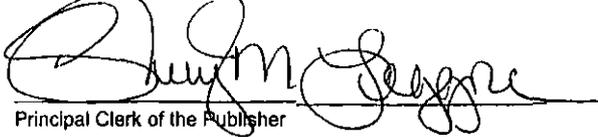
The Patriot News
LEGAL AFFIDAVIT

AD#: 0009849951

Commonwealth of Pennsylvania,) ss
County of Cumberland)

Sheryl Leggore being duly sworn, deposes that he/she is principal clerk of PA Media Group; that The Patriot News is a public newspaper published in the city of Mechanicsburg, with general circulation in Cumberland and Dauphin and surrounding counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Patriot News 01/14/2021


Principal Clerk of the Publisher

Sworn to and subscribed before me this 19th day of January 2021


Notary Public

Commonwealth of Pennsylvania - Notary Seal
Crystal B. Rosensteel, Notary Public
Dauphin County
My commission expires June 27, 2024
Commission number 1299212
Member, Pennsylvania Association of Notaries

**NOTICE OF APPLICATION FOR
EGS AND NGS BROKER LICENSE IN
PA**

Palm Energy LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide both electricity and natural gas supply services as a broker/marketer. Palm Energy will provide these services to Businesses in The Commonwealth of Pennsylvania. Palm Energy LLC proposes to broker electricity and related services in Citizens' Electric, Duquesne Light, Met-Ed, PECO, Penelec, Penn Power, Pike, PPL, UGI Utilities, Wellsboro, and West Penn EDC's. Palm Energy LLC proposes to sell natural gas in Columbia, National Fuels Gas, PECO, People Natural Gas Territories, Peoples Gas Company, Philadelphia Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Division, and Valley Energy Natural Gas Distribution Service Territories. Palm Energy LLC will operate under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Palm Energy 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 Palm Energy's address: Palm Energy LLC, 8901 Quality Rd., Bonita Springs, FL 34135 P: (239) 319-1097

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:

January 14, 2021

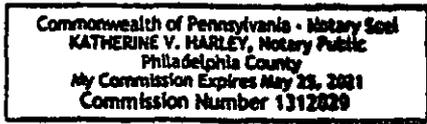
Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to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

Sworn to and subscribed before me this 14th day of
January, 2021.

Helene Sweeney

Katharine V. Harley
Notary Public

My Commission Expires:



Copy of Notice of Publication

NOTICE OF APPLICATION FOR
EGS AND NGS BROKER LICENSE IN PA Palm Energy LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide both electricity and natural gas supply services as a broker/marketer. Palm Energy will provide these services to Businesses in The Commonwealth of Pennsylvania. Palm Energy LLC proposes to broker electricity and related services in Citizens' Electric, Duquesne Light, Met-Ed, PECO, Penelec, Penn Power, Pike, PPL, UGI Utilities, Walleboro, and West Penn EDC's. Palm Energy LLC proposes to sell natural gas in Columbia, National Fuels Gas, PECO, People Natural Gas Territories, Peoples Gas Company, Philadelphia Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Division, and Valley Energy Natural Gas Distribution Service Territories. Palm Energy LLC will operate under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Palm Energy 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 Palm Energy's address: Palm Energy LLC, 8901 Quality Rd., Bonita Springs, FL 34135 P:(239) 319-1097

Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss D. Rullo, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

15 of January, 2021

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.


PG Publishing Company

Sworn to and subscribed before me this day of:
January 15, 2021



Commonwealth of Pennsylvania - Notary Seal
Karen Flaherty, Notary Public
Allegheny County
My commission expires November 16, 2024
Commission number 1386128
Member, Pennsylvania Association of Notaries

COPY OF NOTICE OR PUBLICATION

NOTICE OF APPLICATION FOR EGS AND NGS BROKER LICENSE IN PA
Palm Energy LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide both electricity and natural gas supply services as a broker/marketer. Palm Energy will provide these services to Businesses in The Commonwealth of Pennsylvania. Palm Energy LLC proposes to broker electricity and related services in Citizens Electric, Duquesne Light, Met-Ed, PECC, Penelec, Penn Power, Pike, PPL, UGI Utilities, Wellsboro, and West Penn EDCs. Palm Energy LLC proposes to sell natural gas in Columbia, National Fuels Gas, PECC, People's Natural Gas Territories, Peoples Gas Company, Philadelphia Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Division, and Valley Energy Natural Gas Distribution Service Territories. Palm Energy LLC will operate under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Palm Energy 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 Palm Energy's address: Palm Energy LLC, 8901 Quality Rd., Bonita Springs, FL 34135 P(239) 319-1097

STATEMENT OF ADVERTISING COSTS

Palm Energy LLC
8901 Quality Rd., Attn: Steven M
Bonita Springs Florida 34135

To PG Publishing Company

Total -----



Publisher's Receipt

PG PUBLISHING COMPANY, publisher of general circulation, hereby acknowledges publication costs and certifies that the sam

Office
2201 Sweeney Drive
CLINTON, PA 15026
Phone 412-263-1338

PG Publishir
Pittsburgh Pc
By _____

Pittsburgh Post-Gazette

Legal Advertising Department
412-263-1440 | legaladvertising@post-gazette.com
2201 Sweeney Drive, Clinton, PA 15026

Thank you for advertising with the Pittsburgh Post-Gazette.

Attached is your Affidavit/Proof of Publication for your legal advertisement.

Please do not process payment at this time. An invoice will be mailed separately to your organization from our billing department.

he

I hereby certify that the foregoing is the original Proof subject matter of said notice.

The Scranton Times (Under act P.L. 877 No 160. July 9, 1976)
Commonwealth of Pennsylvania, County of Lackawanna

PALM ENERGY LLC
STEVEN MOFFITT
8901 QUALITY RD BONITA SPRINGS FL 34135

Account # 640130
Order # 82507508
Ad Price: 214.75

NOTICE OF APPLICATION FOR

Sharon Venturi

Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

01.13/2021

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true Sharon Venturi

Sworn and subscribed to before me
this 13th day of January A.D., 2021

Kathleen Weaver
(Notary Public)

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Kathleen Weaver, Notary Public
City of Scranton, Lackawanna County
My Commission Expires June 14, 2021

**NOTICE OF APPLICATION FOR
EGS AND NGS BROKER
LICENSE IN PA**

Palm Energy LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide both electricity and natural gas supply services as a broker/marketer. Palm Energy will provide these services to Businesses in The Commonwealth of Pennsylvania. Palm Energy LLC proposes to broker electricity and related services in Citizens Electric, Duquesne Light, Met-Ed, PECO, Penelec, Penn Power, Pike, PPL, UGI Utilities, Wellsboro, and West Penn EDC's. Palm Energy LLC proposes to sell natural gas in Columbia, National Fuels Gas, PECO, Peoples Natural Gas Territories, Peoples Gas Company, Philadelphia Gas Company, Philadelphia Gas Works, UGI Utilities - Gas Division, and Valley Energy Natural Gas Distribution Service Territories. Palm Energy LLC will operate under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Palm Energy 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 Palm Energy's address: Palm Energy LLC, 8901 Quality Rd., Bonita Springs, FL 34135 Phone: (239) 319-1097

COMMONWEALTH OF PENNSYLVANIA }
 County of Cambria } SS

**NOTICE OF APPLICATION FOR
 EGS AND NGS BROKER LICENSE IN PA**

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On this 20th day of January A.D. 2021, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Christine Marhefka, who being duly sworn according to law, deposes and says as Sales Manager / Major Accounts of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,

published in the County of Cambria, and Commonwealth of Pennsylvania and that the annexed is a true copy of a notice in the above matter published in said publication in the regular issues of The Johnstown Tribune-Democrat, Johnstown, PA, on January 13, 2021; and that the Affiant is not interested in the subject matter of said notice or advertising and that all of the allegations as to time, place and character of said publication are true.

Christine Marhefka

STATEMENT OF ADVERTISING COSTS

Signed and sworn to before me on
 20th day of January, 2021,
 by Christine Marhefka making the statement.

Juan Ohs

0.00 Lines @ \$2.50 per line	0.00
5.5 Inches @ \$25.00 per inch	137.50
Notary Fee	5.00
Clerical Fee	2.50
Total Cost	145.00

Commonwealth of Pennsylvania - Notary Seal
 Vivian Ohs, Notary Public
 Cambria County
 My commission expires December 6, 2024
 Commission number 1123017
 Member, Pennsylvania Association of Notaries

To The Tribune-Democrat, Johnstown, PA
 For publishing the notice or publication
 attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

VIVIAN OHS for publisher of *TRIBUNE-DEMOCRAT*
 a newspaper of general circulation, hereby acknowledges receipt of the aforesaid
 and publication costs and certifies that the same has been duly paid.

TRIBUNE-DEMOCRAT
 (Name of Newspaper)
 By *Juan Ohs*

PROOF OF PUBLICATON OF NOTICE IN THE WILLIAMSPORT
SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929

STATE OF PENNSYLVANIA

COUNTY OF LYCOMING

SS:

Robert O. Rollev, Jr., Publisher of the Sun-Gazette LLC publishers of the Williamsport Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

January 15, 2021

Affiant further deposes that he is an officer daily authorized by the Sun-Gazette LLC, publisher of the Williamsport Sun-Gazette, to verify the foregoing statement under oath and declare that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all the allegations in the foregoing statement as to time, place and character of publication are true.

NOTICE OF APPLICATION FOR EGS AND NGS BROKER LICENSE IN PA

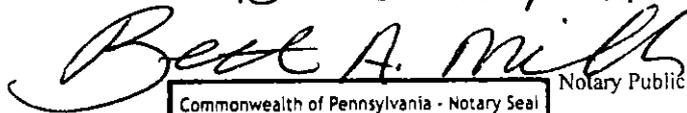
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SUN-GAZETTE LLC

Sworn to and subscribed before me

The 15th day of January 20 21


Notary Public

Commonwealth of Pennsylvania - Notary Seal
BETH A MILLER - Notary Public
Lycoming County
My Commission Expires Jun 4, 2024
Commission Number 1297751

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:

For publishing the notice attached

Hereto on the above state dates.....\$ 231.04

Probated same.....\$

Total.....\$ 231.04

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE SUN-GAZETTE LLC hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid

SUN-GAZETTE LLC

BY Robert O. Rollev, Jr.

Appendix C

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

**Example
CERTIFICATE OF SERVICE**

On this the 28th day of January 2021, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as an Electric Generation 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:

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

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

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

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

Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

RECEIVED
FEB 10 2021

DocuSigned by: **Steve K Moffitt**
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU
Steve Moffitt, President – Palm Energy LLC

PRIORITY
MAIL

ance (restrictions apply)
ernational destinations.

m is required.

exclusions see the

and limitations of coverage.

RECEIVED

FEB 23 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

To schedule free Package Pickup,
scan the QR code.



USPS.COM/PICKUP



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POSTAL SERVICE

Click-N-Ship®

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usps.com 9405 5036 9930 0271 4885 13 0079 5000 0051 7120

\$7.95

US POSTAGE

Flat Rate Env



02/10/2021

Mailed from 34135 062S0000000313

PRIORITY MAIL 3-DAY™

GEORGINA M HILL

Expected Delivery Date: 02/16/21

PALM ENERGY

8901 QUALITY RD

0006

BONITA SPGS FL 34135-7331

C000

SHIP

TO: PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH ST
KEYSTONE BUILDING
HARRISBURG PA 17120-0211

USPS TRACKING #



9405 5036 9930 0271 4885 13

Electronic Rate Approved #038555749