



159 20th St., Suite 1B  
Brooklyn, NY 11232

P. 212 590 0145

info@feller.law  
www.feller.law

**VIA ELECTRONIC FILING and FEDERAL EXPRESS**

July 13, 2021

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

**Re: Electric Generation Supplier License Application of City Power & Gas, LLC (“CPG”); Docket No. A-2021-3025378**

Dear Secretary Chiavetta:

CPG hereby submits its response to the data requests issued on June 14, 2021, and includes:

- Section 5.a. and b. (Responses updated to include criminal/civil proceedings within last five years); and
- Section 7.a. (Response updated to include original Letter of Credit correctly reflecting Applicant’s name).

In addition, in accordance with Pa. Code Section 54.32, CPG encloses under separate cover and requests that its responses and corresponding attachments to the following be treated as confidential:

- Section 5.a. and b. (Responses updated to include criminal/civil proceedings within last five years); and
- Section 7.a. (Response updated to include original Letter of Credit correctly reflecting Applicant’s name).

This information is treated as confidential by CPG, and public disclosure of such information could be potentially harmful to its position as a competitive Electric Generation Supplier. CPG further requests that its responses to any subsequent requests for additional information or clarification which staff might make with regards to these same requests also be permitted to be filed under seal. A separate public version is also attached.

Thank you, and please direct any questions or concerns about the information enclosed to the undersigned.

Respectfully,  
/s/ Michelle Mann  
Michelle Mann  
Director of Government Affairs and  
Regulatory Paralegal  
Feller Law Group, PLLC  
Phone: (718) 690-3480  
Email: michellemann@feller.law  
*On behalf of City Power & Gas, LLC*

Enclosures

## VERIFICATION

I, Michelle Mann, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Respectfully,

/s/ Michelle Mann

Michelle Mann

Director of Government Affairs and  
Regulatory Paralegal

Feller Law Group, PLLC

Phone: (718) 690-3480

[Email: michellemann@feller.law](mailto:michellemann@feller.law)

*On behalf of City Power & Gas, LLC*

Date: July 13, 2021

## 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.

*Please refer to Exhibit 5a - **CONFIDENTIAL and REDACTED***

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

*Please refer to Exhibit 5b - **CONFIDENTIAL and REDACTED***

- 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.

*Please refer to Exhibit 5c and 5d - **CONFIDENTIAL and REDACTED**.*

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

*Please refer to Exhibit 5c and 5d - **CONFIDENTIAL and REDACTED**.*



Response to June 14, 2021, Data Requests

COMPLIANCE, SECTION 5 (a) – 5 (b).

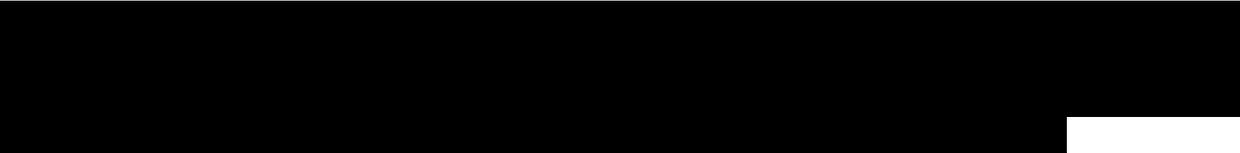




Table 5(a-b)

Party	Relationship	Agency/Court	Proceeding Name	Subject/Citation	Present Status and/or Resolution
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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**FINANCIAL FITNESS, SECTION 7 (a)**

Please see enclosed the revised letter of credit.



