

159 20th St., Suite 18 Brooklyn, NY 11232

Р. 212 590 0145

info@feller.law www.feller.law

VIA ELECTRONIC FILING and FEDERAL EXPRESS

June 30, 2021

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

Re: Natural Gas Supplier License Application of City Power & Gas, LLC ("CPG"); Docket No. A-2021-3025383

Dear Secretary Chiavetta:

CPG hereby submits its response to the Confidential Data Requests issued on May 14, 2021, and includes:

- <u>Section 5.a.</u> (Response updated to address civil matter.)
- <u>Section 5.c. and d.</u> (Updated to provide additional information on compliance matters.)
- <u>Section 7.b.</u> (Financial Fitness updated to include three recent consecutive months of bank statements and two recent consecutive years of tax returns);
- Section 7.b. (UCC Filings included for entities listed in Dun & Bradstreet credit report);
- Section 7.b. (Updated to provide additional information related to bankruptcy resolution) and
- <u>Section 7.b.</u> (Enclosed copy of resolution of filing of Special Events).

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:

- <u>Section 5.a.</u> (Response updated to address civil matter.)
- <u>Section 5.c. and d.</u> (Updated to provide additional information on compliance matters.)
- <u>Section 7.b.</u> (Financial Fitness updated to include three recent consecutive months of bank statements and two recent consecutive years of tax returns);
- Section 7.b. (UCC Filings included for entities listed in Dun & Bradstreet credit report);
- <u>Section 7.b.</u> (Updated to provide additional information related to bankruptcy resolution) and
- <u>Section 7.b.</u> (Enclosed copy of resolution of filing of Special Events).

This information is treated as confidential by CPG, and public disclosure of such information could be potentially harmful to its position as a competitive Natural Gas 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, /<u>s/ Michelle Mann</u> 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*

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,

<u>/s/ Michelle Mann</u> 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

Date: June 30, 2021

REDACTED

Response to May 14, 2021, Data Requests

COMPLIANCE, SECTION 5 (a-b).

COMPLIANCE, SECTION 5 (c-d)

ITEM 1

SECTION 7b - FINANCIAL FITNESS

REDACTED

ITEM 2 UCC REDACTED

ITEM 2

SECTION 7b - FINANCIAL FITNESS

SPECIAL EVENTS

REDACTED