

November 22, 2021

**VIA EMAIL**

Secretary Chiavetta  
Pennsylvania Public Utility Commission  
400 North Street, Keystone Building  
Harrisburg, PA 17120  
rchiavetta@pa.gov

**RE: All Choice Energy MidAmerica LLC d/b/a Raava Energy EGS License Application (“Application”); Docket Number A-2021-3024563; Response to Comments of the Pennsylvania Public Utility Commission (“Commission”) to Application (Update/Revision)**

Dear Secretary Chiavetta:

The undersigned is counsel to All Choice Energy MidAmerica LLC d/b/a Raava Energy (“Applicant”).

Applicant submitted the Application via the PA PUC eFiling System as well as an Update/Revision under the aforementioned Docket Number, and, hereby respectfully submits the attached responses to comments received from the Commission on August 24, 2021.

The remainder of the responses will be submitted separately with a petition for confidential treatment.

Feel free to contact me at 917-664-1305 or [jsteamer@steamerhart.com](mailto:jsteamer@steamerhart.com) with questions.

Sincerely,



Julie B. Steamer

Encl.

**Steamer Hart LLP**

86 Fleet Place, Ste. 32E

Brooklyn, New York 11201

917-664-1305 tel 212-500-7973 fax

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Docket No. A-2021-3024563  
All Choice Energy MidAmerica LLC d/b/a Raava Energy  
Responses to Data Requests dated August 24, 2021

1. EGS Application Update – On August 2, 2021, applicant filed updated EGS application pages with the Commission. The updated pages only included the information that was changing, leaving all other sections on those pages blank. All sections on the updated application pages must be filled out completely. Please provide the updated application pages with the appropriate corrections.

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of All Choice Energy MidAmerica LLC, d/b/a Raava Energy, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) [as specified in item #4b below] 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:  
All Choice Energy MidAmerica LLC d/b/a Raava Energy  
3 School Street, Suite 101B  
Glen Cove, New York 11542  
www.raavaenergy.com  
Phone: 844-344-2672  
\*Applicant will only do business as an EGS in Pennsylvania under the d/b/a Raava Energy.
- 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.  
Esquire Assist Ltd.  
125 Locust St.  
Harrisburg, PA 17101  
Phone: 717-232-9398  
Fax: 717-232-6248
- 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.  
Julie B. Steamer, Esq., General Counsel  
Steamer Hart LLP  
86 Fleet Place, Suite 32E  
Phone: 917-664-1305 Fax: 212-500-7973  
E-mail: jsteamer@steamerhart.com
- 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.  
Julie B. Steamer, Esq., General Counsel  
Steamer Hart LLP  
86 Fleet Place, Suite 32E  
Phone: 917-664-1305 Fax: 212-500-7973  
E-mail: jsteamer@steamerhart.com
- 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.  
1. Christopher Polke, CEO, 3 School Street, Suite 101B, Glen Cove, New York 11542  
Phone: 347-239-7400 Fax: 516-213-1296 Email: cpolke@allchoiceenergy.com  
2. Jonathan Parrella, Director of Operations, 3 School Street, Suite 101B, Glen Cove, New York 11542  
Phone: 203-858-1915 Fax: 516-213-1296 Email: jparrella@allchoiceenergy.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. See Attachment 2.a.

**or**

The Applicant will not be using a fictitious name.

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**

c. **PROPOSED SERVICES:** Describe in detail the electric services or the electric generation services which the Applicant proposes to offer. See Attachment 4.c.

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)
- Large Commercial Customers - (Over 25 kW)
- Industrial Customers
- Governmental Customers
- All of above
- Other (Describe):
- Residential and Small Commercial Customers in a Mixed Meter Capacity -

This customer class reflects situations in which a large commercial, industrial, and/or governmental customer account also contains features of residential and/or small commercial customers. In this instance, the residential and/or small commercial portion must be an incidental portion of the larger account. **This customer class alone does not allow marketing targetted directly to residential and/or small commercial customers.** Further information may be found in the Requirements Applicable to Mixed Meter Scenarios Secretarial Letter served March 25, 2011, at Docket No. M-2009-2082042.

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth. The Applicant intends to commence actively market within the Commonwealth as soon as this Application is approved by the PA Public Utility Commission and all EDI flight testing as been completed.

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. See Attachment 8.d.

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.

See Attachment 8.e.

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 ER21-1197-000.
- 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.

2. Reference Application, Section 7.a, Financial Fitness – Applicant provided a financial security in which it lists its name as All Choice Energy MidAmerica, LLC. However, per the PA Department of State website, applicant’s name is All Choice Energy MidAmerica LLC (without a comma). Please provide an updated financial security in which the applicant’s name matches All Choice Energy MidAmerica LLC, exactly.

Rider to Bond with correct spelling of All Choice Energy MidAmerica LLC is in process and will be provided as soon as possible.



5. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide the New York electric industry license for its affiliate. Please provide the missing documentation.

Attachment 8.a.

See Attached.



**Department of  
Public Service**

Three Empire State Plaza, Albany, NY 12223-1350  
www.dps.ny.gov

**Public Service Commission**  
**John B. Howard**  
Interim Chair and  
Interim Chief Executive Officer

**Diane X. Burman**  
**James S. Alesi**  
**Tracey A. Edwards**  
Commissioners

March 9, 2021

Mr. Christopher Polke  
All Choice Energy, LLC  
3 School Street, Suite 101B  
Glen Cove, NY 11542

RE: All Choice Energy, LLC – Revised Eligibility

Dear Mr. Polke:

Thank you for submitting the recent updates to your ESCO Retail Access Application Package pursuant to the Public Service Commission's December 2019 Order Adopting Changes to the Retail Access Energy Market and Establishing Further Process. This letter is to inform you that the documentation submitted has been reviewed by Staff and determined to be in compliance with the Uniform Business Practices and the requirements set forth in the December 2019 Commission Order. Therefore, Staff acknowledges All Choice Energy, LLC, is deemed eligible to serve a Renewable Variable Rate electric product to residential and small non-residential customers (mass market customers) in New York State. If you currently have eligibility to serve large commercial and industrial customers, that eligibility has not been affected.

Be advised that to maintain your ESCO eligibility, you must notify Staff of any substantive legal, financial, or business-related changes to your company as they occur. If your business plan changes and you decide to expand your service, you must immediately submit the appropriate documentation for Staff review and determination of how it affects your current eligibility.

Please do not hesitate to contact me if you have any further questions or concerns at (518) 474-5858 or [Kathleen.oriley@dps.ny.gov](mailto:Kathleen.oriley@dps.ny.gov).

Sincerely,

Kathleen O'Riley  
Office of Consumer Services

I, Christopher Polke, 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).

*Christopher Polke*

Christopher Polke

September 27, 2021