

COMMONWEALTH OF PENNSYLVANIA

PENNSYLVANIA PUBLIC UTILITY COMMISSION COMMONWEALTH KEYSTONE BUILDING 400 NORTH STREET HARRISBURG, PENNSYLVANIA 17120 July 22, 2022

> Docket No. A-2022-3032904 Utility Code: 1225301

CERTIFIED

JOHN T HOLMES CEO FRONT LINE POWER SOLUTIONS LLC 3 SHANNON CT UNIT 310 BRISTOL RI 02809

RE: Natural Gas Supplier License Application

Dear Mr. Holmes:

On June 13, 2022, the Public Utility Commission (Commission) accepted Front Line Power Solutions, LLC's application for a Natural Gas Supplier license. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached question(s).

Please use the Commission's efiling system or an overnight delivery service to submit the requested information to the Secretary of the Commission within 30 days from the date of this letter. The Commission accepts all public documents through our efiling system and strongly recommends companies open an efiling account through the Commission's website at https://efiling.puc.pa.gov. Use of the efiling system will ensure that submissions by the company are received timely and receipt can be verified. Failure to respond timely may result in the application being denied.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above and mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

The overnight address for hard-copy or confidential responses is:

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission 400 North Street Harrisburg, PA 17120 Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], 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).	
	Signature
	Title
	Date
	<u> </u>

Please note that all documents requiring notary stamps must have original signatures.

If Front Line Power Solutions, LLC has decided to withdraw its application, please reply notifying the Commission of such a decision.

Finally, in order to expedite the application review process, please send a copy of your response to Jeff McCracken at jmccracken@pa.gov. If any problems arise that prevent a full timely response or if any clarification of these data requests is needed, please contact Jeff McCracken of the Bureau of Technical Utility Services via e-mail at jmccracken@pa.gov (preferred) or (717) 783-6163.

Sincerely,

Rosemary Chiavetta

Secretary

Enclosure

Docket No. A-2022-3032904 Front Line Power Solutions, LLC Data Requests

- 1. Reference Application, Section 1.c, Regulatory Contact Applicant failed to provide a title for its regulatory contact. Please provide an updated application page with the appropriate corrections.
- 2. Reference Application, Section 1.e, Customer Complaints Contact Info Applicant failed to list the titles for its primary and alternate contact for complaints and customer service. The application requires the full contact information for a primary and an alternate contact. Please provide an updated application page with the appropriate corrections.
- 3. Reference Application, Section 2.b, Chief Officers Applicant failed to provide its chief officers names and addresses. Please provide an updated application page with the requested information.
- 4. Reference Application, Section 3.b, Predecessors Applicant erroneously listed its cancelled license as a predecessor. Information regarding its cancelled licenses should be listed in Section 5.c. Please file an updated application page with the appropriate corrections.
- 5. Reference Application, Section 4.b, Proposed Operations Applicant indicated that it proposes to operate as a Broker/Marketer but failed to indicate that it would not be taking title to the natural gas nor making payments for customers. Please file an updated application page with the appropriate corrections.
- 6. Reference Application, Section 4.c, Description of Proposed Services Applicant provided a description of proposed electricity services in the application package. Please submit an updated application page including the natural gas services which the applicant proposes to offer.
- 7. Reference Application, Section 4.f, Start Date Applicant listed a start date of 02/02/2022, but stated in Section 4.a that it was not presently doing business within the Commonwealth of Pennsylvania. Please update your start date to be a future date, or upon approval of the application.
- 8. Reference Application, Section 5.c, Customer/Regulatory/Prosecutory Actions Applicant failed to list the cancellation of its prior EGS License (Docket No. A-2013-2360865) for financial security EGS regulation non-compliance. Applicant also failed to list the cancellation of its prior NGS License (Docket No. A-2014-2441030) for non-payment of its Annual Fees. Please file an updated application page with the requested information.

- 9. Reference Application, Section 7.a, Financial Fitness Applicant failed to provide a natural gas distribution company bonding letter for each utility in whose service territory it wishes to operate. Please provide the missing documentation.
- 10. Reference Application, Section 7.b, Financial Fitness Applicant provided minimal documentation to demonstrate financial fitness. Please provide financial fitness documentation that may include two recent consecutive years of financial statements, two recent consecutive years of income tax filings, and three recent consecutive months of bank statements, etc.
- 11. Reference Application, Section 7.f, Taxation Applicant failed to provide a Revenue ID Number. Please resubmit a complete Tax Certification Statement.
- 12. Reference Application, Section 8.a, Technical Fitness Applicant failed to provide a license for each state in which it operates in the electric or natural gas industries. Please provide the missing documentation.