

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Front Line Power Solutions, LLC

N/A

Application of \_\_\_\_\_, d/b/a \_\_\_\_\_, for approval to offer, render, furnish, or supply natural gas supply 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:

Front Line Power Solutions, LLC, 3 Shannon Ct, Unit 310, Bristol, RI 02809  
4014744776  
Website: N/A www.fpsenergy.com

**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.

Corporation Service Company, Dauphin County  
2595 Interstate Dr #103, Harrisburg, PA 17110  
Phone Numbers: (717) 526-4330, (800) 622-2300  
Facsimile Number: (717) 526-4401

**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.

John T Holmes  
3 Shannon Ct Unit 310, Bristol, RI 02809 4014744776  
'jholmes@frontlinepowersolutions.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.

N/A

**e. CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** 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 Natural Gas 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 NGSS.

John T Holmes  
3 Shannon Ct Unit 310, Bristol, RI 02809  
4014744776  
'jholmes@frontlinepowersolutions.com'

Timothy Dahler  
3 Shannon Ct Unit 310, Bristol, RI 02809  
4013019915  
tdahler@fpsenergy.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.

**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**

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

### 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.

Not Applicable

- 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.

Front Line Power Solutions, LLC has a delinquent Energy Broker license (A-2013-2360865) \ that expired on 4/30/2020.



#### 4. OPERATIONS

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

Definitions

- Supplier – an entity which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of a natural gas distribution company
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of natural gas but does not take title to the natural gas.

- The Applicant is presently doing business in Pennsylvania as a
- natural gas interstate pipeline
  - municipality providing service outside its municipal limits
  - local gas distribution company
  - retail supplier of natural gas services in the Commonwealth
  - a natural gas producer
  - a broker/marketer engaged in the business of supplying natural gas 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:

- Supplier or Aggregator of natural gas services
- Municipal supplier of natural gas services
- Cooperative supplier of natural gas services
- Broker/Marketer engaged in the business of supplying natural gas services
  - Check here to verify that your organization will not be taking title to the natural gas nor will you be making payments for customers.
- Other (Describe):



**C. PROPOSED SERVICES:** Describe in detail the natural gas supply services which the Applicant proposes to offer.

Broker/marketer engaged in the business of supplying electricity services

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

- |  |   |
|--|---|
| <input type="checkbox"/> Columbia                    | <input type="checkbox"/> Peoples Gas Company          |
| <input type="checkbox"/> National Fuel Gas           | <input type="checkbox"/> Philadelphia Gas Works       |
| <input type="checkbox"/> PECO                        | <input type="checkbox"/> UGI Utilities – Gas Division |
| <input type="checkbox"/> Peoples Natural Gas Company | <input type="checkbox"/> Valley Energy                |
|  | <input checked="" type="checkbox"/> All of the above  |

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

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)
- Large Commercial Customers - (6,000 Mcf or more annually)
- 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 targeted 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.

02/02/2022

## 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.

Not Applicable

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

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints 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 Complaints

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

NA

## 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:

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

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

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

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

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

b.) **NGDCs:** 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 Natural Gas 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 NGDC is as follows.

<p><b>Columbia Gas of PA, Inc.</b>  Transport Support Services  290 W. Nationwide Blvd.  Columbus, OH 43215  PH: 614.460.4980  e-mail: <a href="mailto:transportevaluations@nisource.com">transportevaluations@nisource.com</a></p>	<p><b>National Fuel Gas Distribution Corp.</b>  Joanne E. Maciok  6363 Main Street  Williamsville, NY 14221  PH: 716.857.7670  FAX: 716.857.7479  e-mail: <a href="mailto:maciokj@natfuel.com">maciokj@natfuel.com</a></p>
<p><b>Peoples Natural Gas Company LLC</b>  Carol Scanlon  375 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6931  FAX: 412.208.6577  e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>PECO</b>  Carlos Thillet, Manager, Gas Supply and Transportation  2301 Market Street, S9-2  Philadelphia, PA 19103  PH: 215.841.6452  Email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a></p>
<p><b>Peoples Gas Company LLC</b>  Carol Scanlon  375 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6931  FAX: 412.208.6577  e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>Philadelphia Gas Works</b>  Ryan Reeves, Director Supply Transportation &amp; Control  800 West Montgomery Avenue  Philadelphia, PA 19122  PH: 215.787.5103  email: <a href="mailto:pgwchoicesupply@pgworks.com">pgwchoicesupply@pgworks.com</a></p>
<p><b>Valley Energy Inc.</b>  Ed Rogers  523 South Keystone Avenue  Sayre, PA 18840-0340  PH: 570.888-9664  FAX: 570.888.6199  email: <a href="mailto:erogers@ctenterprises.org">erogers@ctenterprises.org</a></p>	<p><b>UGI Utilities, Inc. – Gas Division</b>  Sherry Epler  1 UGI Drive  Denver, PA 17517  PH: 610.796.3447  Email: <a href="mailto:sepler@ugi.com">sepler@ugi.com</a></p>



## 7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require. The contact information is located in Section 6.b.
- 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: Hard copies have been mailed directly to the commission.
- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.
  - 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.

Broker / Marketer only

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

Fees collected as a margin of supplier rate paid to broker by supplier

- 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.

John T Holmes, 3 Shannon Court, Unit 310, Bristol, RI 401-240-0071, johnholmes@fpsenergy.com

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application.

*All sections of the Tax Certification Statement must be completed. Submitting N/A on either the Sales Tax License Number or the Employer ID Number (items 7A and 7B) 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.*

Frontline Power Solutions does not collect taxable fees from customers, we are compensated by Licensed Suppliers who are responsible for the sales tax.

## 8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by natural gas distribution companies 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:

Applicant operated as Gas Broker in PA (Lic# A-2014-2441030) from 2014 - 2020

- Applicant's previous experience in the natural gas industry.
- Summary and proof of licenses as a supplier of natural gas 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.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

Applicant operated as Gas Broker in PA (Lic# A-2014-2441030) from 2014 - 2020 and ceased doing business due to Covid -19

- b. **PROPOSED MARKETING METHOD** (check all that apply)

- Internal – Applicant will use its own internal resources/employees for marketing
- External NGS – Applicant will contract with a **PUC LICENSED NGS**
- Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
- External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or non-selling marketer**
- 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.

National, State, County, and Federal (PACER) Background Checks, Including Social Security Validation, AKA Record Search, 10 Year SSN History Search, National Sex Offender Registry, OFAC, Terrorist Watch Lists

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.

Sales Agent Contract Agreements, Customer Support Surveys

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.

John T Holmes - Owner / CEO

## 9. DISCLOSURE STATEMENT:

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

**DISCLOSURE STATEMENTS:** If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas 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.

N/A



## 10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **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 § 62.114.

AGREED

- b. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission:

- Reports of Gross Receipts: Applicant shall file an annual report with the Commission on an annual basis no later than April 30<sup>th</sup> following the end of the calendar year per 52 Pa. Code § 62.110.

AGREED

- c. **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. § 2208(d). Transferee will be required to file the appropriate licensing application.

AGREED

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

ACKNOWLEDGED

- e. **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 § 62.105.

AGREED

- f. **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

**g. 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 thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.

AGREED

**h. 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

**i. 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**  
(All 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.
- b.) OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the Public Utility Code of Pennsylvania and applicable federal and state laws. An example copy of this Affidavit can be found at Appendix B.

## 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 NGDC. For example, an applicant that wants to operate in Peoples Natural Gas would need to run ads in The Erie Times-News, the Pittsburgh Post-Gazette, and the Johnstown Tribune-Democrat. 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 or Philadelphia Inquirer	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Columbia Gas	X	X		X		X	X
National Fuel Gas	X			X			
PECO			X				
Peoples Natural Gas	X			X			X
Peoples Gas Company				X			
Philadelphia Gas Works			X				
UGI Utilities – Gas Div.	X	X	X	X	X	X	X
Valley Energy					X	X	
Entire Commonwealth	X	X	X	X	X	X	X

*(Newspaper Publication Templates are provided at Appendices F and G)*

## 13. SIGNATURE

Applicant: Front Line Power Solutions, LLC  
 By: John T Holmes  
 Title: CEO



**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 is complete.

**Applicant:** Front Line Power Solutions, LLC

Applicant's Use	<b>Signature</b>	
	<b>Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)</b>	
	<b>Application Affidavit</b>	
	<b>Operations Affidavit</b>	
	<b>Proof of Publication</b>	
	<b>Tax Certification Statement</b>	
	<b>Commonwealth Department of State Verification</b>	
	<b>Certificate of Service</b>	

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Rhode Island :

: ss.

County of Bristol :

John T Holmes, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the CEO (Office of Affiant) of Front Line Power Solutions, LLC (Name of Applicant);]

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

Front Line Power Solutions, LLC  
That the Applicant herein \_\_\_\_\_ 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).  
Front Line Power Solutions, LLC

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

Front Line Power Solutions, LLC  
That the Applicant herein \_\_\_\_\_ acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

Front Line Power Solutions, LLC  
That the Applicant herein \_\_\_\_\_ 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.

[Signature]  
Signature of Affiant

Sworn and subscribed before me this 22 day of March, 2022.

[Signature]  
Signature of official administering oath  


My commission expires 2/11/2024.

Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Rhode Island :

: ss.

County of Bristol :

John T Holmes, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the John T Holmes, CEO (Office of Affiant) of Front Line Power Solutions, LLC (Name of Applicant);]

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

Front Line Power Solutions, LLC

That \_\_\_\_\_, 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.

Front Line Power Solutions, LLC

That \_\_\_\_\_, 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.

Front Line Power Solutions, LLC

That \_\_\_\_\_, 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)**

Front Line Power Solutions, LLC

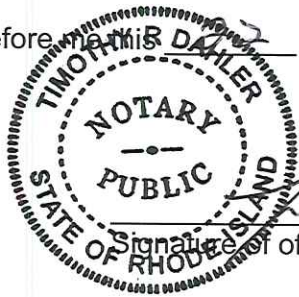
That \_\_\_\_\_, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 and the standards and billing practices of 52 PA. Code Chapter 56.

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.

  
\_\_\_\_\_  
Signature of Affiant

Sworn and subscribed before me this 7<sup>th</sup> day of March, 2022.



  
\_\_\_\_\_  
Signature of official administering oath

My commission expires 9/14/2024.

## Appendix C

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

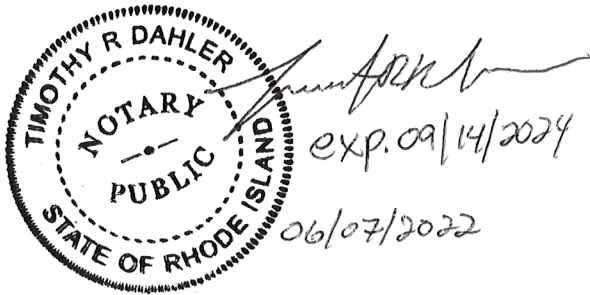
### CERTIFICATE OF SERVICE


On this the 7 day of June 2021 I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas 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:

<p><b>Office of Consumer Advocate</b> 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17120</p>	<p><b>Office of the Attorney General</b> Bureau of Consumer Protection Strawberry Square, 14th Floor Harrisburg, PA 17120</p>
<p><b>Office of the Small Business Advocate</b> Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101</p>	<p><b>Department of Revenue</b> Bureau of Compliance PO Box 281230 Harrisburg, PA 17128-1230</p>
<p><b>Bureau of Investigation &amp; Enforcement</b> Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120</p>	
<p><b>Columbia Gas of PA, Inc.</b> Transport Support Services 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.4980 e-mail: <a href="mailto:transportevaluations@nisource.com">transportevaluations@nisource.com</a></p>	<p><b>National Fuel Gas Distribution Corp.</b> Joanne E. Maciok 6363 Main Street Williamsville, NY 14221 PH: 716.857.7670 FAX: 716.857.7479 e-mail: <a href="mailto:maciokj@natfuel.com">maciokj@natfuel.com</a></p>
<p><b>Peoples Natural Gas Company LLC</b> Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>PECO</b> Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a></p>
<p><b>Peoples Gas Company LLC</b> Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: <a href="mailto:Carol.Scanlon@peoples-gas.com">Carol.Scanlon@peoples-gas.com</a></p>	<p><b>Philadelphia Gas Works</b> Ryan Reeves, Director Supply Transportation &amp; Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: <a href="mailto:pgwchoicesupply@pgworks.com">pgwchoicesupply@pgworks.com</a></p>

**Valley Energy Inc.**  
Ed Rogers  
523 South Keystone Avenue  
Sayre, PA 18840-0340  
PH: 570.888-9664  
FAX: 570.888.6199  
email: [erogers@ctenterprises.org](mailto:erogers@ctenterprises.org)

**UGI Utilities, Inc. – Gas Division**  
Sherry Epler  
1 UGI Drive  
Denver, PA 17517  
PH: 610.796.3447  
Email: [sepler@ugi.com](mailto:sepler@ugi.com)



  
\_\_\_\_\_  
John Holmes, President  
Front Line Power Solutions, LLC





**BANK OF AMERICA** 

PO BOX 25118  
TAMPA, FL 33622-5118

NS 0126 287 501 05164 #001 AB 0.461

FRONT LINE POWER SOLUTIONS, LLC  
OPERATING ACCOUNT  
149 HOPEWORTH AVE  
BRISTOL RI 02809-4826

Case Number 220124NS009149

Account(s) ending in: 4150

Date January 24, 2022

Account information

bankofamerica.com

We're confirming your account(s) was opened on October 6, 2014, and remains open.

Thank you for banking with us.

Bank of America and the Bank of America logo are registered trademarks of the Bank of America Corporation.  
Bank of America, N.A. Member FDIC.

RIQDEPACC ACNF

## Corporate Profile

Frontline Power Solutions, LLC (“Frontline”), an electric power and natural gas commodity brokerage licensed to conduct business in eleven deregulated U.S. states since 2013. Collectively, Frontline is a full service energy consulting firm offering comprehensive energy solutions for municipal and private industry clientele. Frontline’s staff and strategic partner network is comprised of consultants, procurement specialists, engineers, contractors, and software developers enabling us to handle a wide array of projects ranging from third party energy procurement to utility audits to energy management systems. We offer our clients a unique and customized approach to each customer’s energy needs.

## Corporate Objectives

Frontline’s market initiative is to bring comprehensive energy management solutions to a pre-qualified clientele of which meet the client’s objectives pertaining to overall energy cost reduction. The ideal Frontline client exists in the commercial, industrial, and/or municipal sector and has an annual energy spend of \$100,000 or more. It is Frontline’s goal to aid facility managers, energy managers, and operations managers in becoming an outsourced energy department—offering an array of energy services from document management, utility auditing, billing management, commodity procurement, automation, and efficiency strategy.

Mission Statement: To deliver exceptional energy management strategies to our clients.

## Commodity Procurement

Commercial and industrial entities can benefit from entering into electric power and natural gas commodity supply arrangements with energy suppliers in several ways. In a traditional swap agreement, energy suppliers absorb market risk on behalf of the client in exchange for a fixed price component. These agreements allow end-users to avoid market volatility and forecast costs. Alternatively, end-users can participate in the open market to capture savings during downward trends. At Frontline, we advise our clients on choosing the right commodity supply agreements for their energy loads and risk tolerance.

Each commodity supply agreement begins with an understanding our client’s energy load profile. Base on this data, we prepare an RFP on our client’s behalf outlining the specific commodity supply product and special contract language. This RFP is sent out to all licensed electric and natural gas generation suppliers in the market to procure the best services and pricing in the supply market.

## Electric & Gas Supplier Channel Partners

AEP Energy  
Ambit Energy  
Atlantic Energy  
Champion Energy  
ConEdison Solutions  
Constellation  
Crius Energy  
Direct Energy  
EDF  
First Point Power  
Engie  
Great Eastern Energy

IGS  
Major Energy  
Mega Energy  
Mint Energy  
Nordic Energy  
PSEG  
Snyder Bros  
Sprague Energy  
Sunwave Gas and Power  
Supreme Energy  
Talen Energy  
UGI Energy Services  
WGL Energy

## SCOPE OF SERVICES

### Energy Management

Frontline begins each relationship by acquiring a thorough understanding of our client's objectives for their proposed project. Based on these objectives, Frontline will prepare an intelligent, cost-effective strategy to meet the client's goals and time schedule, and will prepare the required resources to competently execute the proposed project. Our staff and partners have the necessary skills, licenses, and certifications to perform these tasks in accordance with acceptable regulatory practices. The following is a list of services provided by Frontline and our supplier channel partners:

### Frontline Services:

- Preliminary Project Assessment
- Utility Studies and Audits
- Electric and Natural Gas Generation Supply Procurement Risk Management
- Market Intelligence Reports
- Document Management
- Power Quality Assessment
- Renewable Energy Project Coordination
- Energy Credit Procurement
- Demand Response Execution and Management
- Vendor Qualification and Vetting
- Phase Balancing Application and Reactive Load Reduction
- Harmonic Studies and Assessments



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Atlantic Energy  
Champion Energy  
ConEdison Solutions  
Constellation  
Crius Energy  
Direct Energy  
EDF  
First Point Power  
Engie  
Great Eastern Energy

IGS  
Major Energy  
Mega Energy  
Mint Energy  
Nordic Energy  
PSEG  
Snyder Bros  
Sprague Energy  
Sunwave Gas and Power  
Supreme Energy  
Talen Energy  
UGI Energy Services  
WGL Energy

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- Vendor Qualification and Vetting
- Phase Balancing Application and Reactive Load Reduction
- Harmonic Studies and Assessments

## JOHN T HOLMES

- 2013-Present **CEO, Frontline Power Solutions**, Bristol RI,  
Licensed energy ESCO operating in all deregulated states. Responsible for the development of all operational procedures and scaling of corporate expansion. Responsible for investor relations and reporting.
- 2011-2013 **CEO Negawatt Business Solutions**, a division of Glacial Energy. St Thomas USVI.  
Energy Efficiency, Demand Response, Responsible for the development of all operational procedures and direction corporate expansion.
- 2009-2011 **Senior Vice President Glacial Energy**, St Thomas USVI.  
Launched and managed the development of all Pennsylvania energy Markets. Generating \$146M in gross revenue within 18 months. Responsible for all hiring, training. Responsible for all back office operations and procedures.
- 2007-2009 **Regional Director, Glacial Energy**, St Thomas USVI.  
Launched and managed the development of the Rhode Island Energy market. Captured 14 percent of the commercial energy Market, resulting in 45M in gross revenue. Responsible for all hiring, training and back office operations and procedures.
- 2006-2007 **Business Development Manager**, Glacial Energy, St Thomas USVI  
Sold energy supply contracts to commercial users. 8 million annual Kwh's sold monthly.
- 1993-2005 **CEO, Direct Access Inc.**, Providence Rhode Island  
Advertising/Promotional firm. Developed 30 direct sales offices. Sold promotional packages business to business, door to door.
- 1991-1993 **Divisional Vice President**, Safety Plus Inc. Lexington Ky.  
Direct sales of fire safety equipment to commercial and residential customers.
- 1989-1991 **Boston Office Manager** Safety, Plus Inc., Lexington Ky.  
Hired, trained and maintained 15 direct sales representatives. #1 office out of 196 offices.
- 1988-1989 **Sales Representative**, Safety Plus Inc. Lexington Ky.  
Sold fire safety equipment to commercial businesses.

Education | Hawthorne College, Antrim NH • 1988 | BS-Aviation Management



## JOHN T HOLMES

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Hawthorne College, Antrim NH • 1988  
BS-Aviation Management

**Timothy R. Dahler**  
299 Washington Road  
Barrington, RI 02806  
c: 401.301.9915 | dahler.tim@gmail.com

## **Experience:**

### **Az Fresh Farms, Kingman, AZ**

August 2019-Present

#### *Chief Technical Officer / Partner*

Agriculture technology start-up; 50-acre controlled environment greenhouse and vertical farm

- Research and financial modeling for 50-acre greenhouse project, including design, technology, energy, and lighting systems.
- Procure and manage contractor quotes and engineering for \$62+ million greenhouse facility
- Identify and vet new agriculture technology in automation, irrigation, monitoring, pest control, plant nutrition, packaging, and environmental controls.

### **PowerTrak Grow, Bristol, RI**

January 2018-Present

#### *Chief Technical Officer / Partner*

Agriculture technology development, design consulting and technology sales.

- Develop, identify, and procure state of the art lighting systems for controlled environment agriculture facilities
- Facility design and rendering of 5000 square foot to 50-acre indoor vertical farms and greenhouses.
- Create environment lighting simulations for peak efficiency of grow lighting and spectrum.
- Design and implementation of state-of-the-art hydroponic growing systems

### **Frontline Power Solutions, LLC., Bristol, RI**

March 2014-Present

#### *Chief Technical Officer*

- Developed online commercial retail energy supply sales marketing and payment management system (CRM) and developed automated supplier bidding software.
- Responsible for tracking and payroll for over 2000 commercial accounts and 100+ commissioned sales staff.
- Responsible for State and local ESCO licensing applications and renewals.
- Developed and administered 25 person in-house marketing call center.
- Supervised commercial electric/gas pricing desk, clerical, marketing and IT personnel.
- Managed energy supplier channel partnerships and contracts (52 National ESCOs).

### **Concept Link, LTD., 2 College Street, Providence, RI**

March 1997-2014

#### *Partner/Founder*

Concept Link is an established full-service professional digital media and design solutions center. Using state-of-the-art technology, Concept Link provides a broad range of advertising production services including.

#### 1. Production, Design & Technical Consulting

- Advertising Creative and Production
- Website Design & Development
- Point-of-Purchase Design
- Industrial Design – Product Design & Development
- Fine Art Large Format Printing/ Display Graphics
- Computer Training & Consulting



## **Responsibilities:**

- Management of print production, network, and computer hardware and software systems in an integrated Macintosh and PC environment for two retail locations.
- Research of equipment acquisition and cost auditing of all printers, computer systems, and consumables.
- Maintained relationships with vendors for all necessary supplies and hardware systems. Management, development and design of client creative production, client relations, corporate marketing proposals, advertising, packaging and point of purchase materials.
- Training and management of employees and interns

## **Notable Projects:**

(RISD) Prints by Concept Link: Fall 2002 – 2018. Development, implementation and staffing of an on campus digital imaging center for Rhode Island School of Design / Brown students, faculty and staff to augment current on campus technology and provide print production and educational consulting. Supply cost auditing, equipment acquisition, and consumable attainment services providing the RISD community and administration with cost effective and professional digital imaging options. Training and consultation to student body and staff on high level technical systems and group project competitions.

Rhode Island Treasures Exhibition: Solely responsible for content collection, project management database development, graphic design, large format digital output, and graphic installation of an 10,000 square foot exhibit sponsored by the Providence Tourism Council featuring over 125 Rhode Island artifacts, 70 integrated individual exhibits, 240 - 3' x 8' graphic panels, and over 120 mounted graphics. Worked closely with over 35 lending institutions (museums), sponsors, contractors, vendors, media partners, writers, and exhibit directors.

FujiFilm, USA: March 1997--2014. Design and development of one-hour mini-labs, point of purchase, and promotional programs for chain drug and department stores across the country including: Wal-Mart, Target, Kmart, CVS, Walgreen's, Rite-Aid, etc. Design and develop corporate marketing tools including physical mini-lab department design, 3D renderings, CD-Rom multimedia sales tools, PowerPoint presentations, in store point of purchase program design, and packaging programs including production and distribution.

## **Highlights:**

Obtained first ever outside vendor contract with the Rhode Island School of Design to provide educational and digital imaging consulting services to students, faculty, and staff. Maintained contract for 16 years.

Developed networked in-house accounting software package including invoicing, accounts payable, accounts receivable, quote generation, custom search functions, customer tracking, job logging, marketing, and detail reporting using FileMaker Pro.

Met School Mentor: High school internship program. Mentored three students over four years two full days per work/school week – each student graduated with full academic scholarships to Brown University, Springfield College and URI.

**Samsonite, Main Street, Warren, Rhode Island.**

Freelance Database Design

1996-1997

Converted Adobe Illustrator luggage design templates into FileMaker Pro relational databases to streamline industrial design and manufacturing order forms.

Communicated daily with design team to enhance design production processes and create cost effective means of communication with off-shore manufacturing firms.

**Software Experience:**

<u>Software</u>	<u>Level of Proficiency</u>	<u>Years of Experience</u>
Adobe Photoshop	High	20 +
Adobe Illustrator	High	18 +
Adobe Acrobat	High	8 +
Adobe InDesign	High	10 +
Adobe Premiere	Proficient	18 +
FileMakerPro	High	22 +
Microsoft Office	High	20 +
Dreamweaver	High	15 +
Trimble Sketch Up	High	8 +
AutoCad	Familiar	10 +

Expert in advanced hardware / software aspects of Apple, Microsoft, Linux computer systems including both WAN and LAN networking, system administration, hardware/software installation and troubleshooting.

**Education: Roger Williams University, Bristol, Rhode Island 1990-1994**  
**Bachelor of Fine Arts**  
**Major: Painting, Printmaking**  
**Minor: Computer Information Systems**

Filing Fee: \$150.00

ID Number: \_\_\_\_\_



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

Office of the Secretary of State  
Corporations Division  
148 W. River Street  
Providence, Rhode Island 02904-2615

**LIMITED LIABILITY COMPANY**

**ARTICLES OF ORGANIZATION**

Pursuant to the provisions of Chapter 7-16 of the General Laws of Rhode Island, 1956, as amended, the following Articles of Organization are adopted for the limited liability company to be organized hereby:

1. The name of the limited liability company is:

**Front Line Power Solutions, LLC**

2. The address of the limited liability company's resident agent in Rhode Island is:

**443 Hope Street**

**Bristol**

, RI **02809**

(Street Address, not P.O. Box)

(City/Town)

(Zip Code)

and the name of the resident agent at such address is **Alfred R. Rego, Jr.**

(Name of Agent)

3. Under the terms of these Articles of Organization and any written operating agreement made or intended to be made, the limited liability company is intended to be treated for purposes of federal income taxation as:

*(Check one box only)*

a partnership

or

a corporation

or

disregarded as an entity separate from its member

4. The address of the principal office of the limited liability company if it is determined at the time of organization:

**54 Viking Drive, Bristol, Rhode Island**

*(If not determined, so state)*

5. The limited liability company has the purpose of engaging in any lawful business, and shall have perpetual existence until dissolved or terminated in accordance with Chapter 7-16, unless a more limited purpose or duration is set forth in paragraph 6 of these Articles of Organization.

**FILED**

**FEB 01 2013**

BY

DS 189009

DS 8.53

6. Additional provisions, if any, not inconsistent with law, which the members elect to have set forth in these Articles of Organization, including, but not limited to, any limitation of the purposes or duration for which the limited liability company is formed, and any other provision which may be included in an operating agreement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Management of the Limited Liability Company:

A. The limited liability company is to be managed  by its members. *(If you have checked this box, go to item no. 8.)*

or

B. The limited liability company is to be managed  by one (1) or more managers. *(If the limited liability company has managers at the time of the filing of these Articles of Organization, state the name and address of each manager.)*

Manager

Address

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

8. The date these Articles of Organization are to become effective, if later than the date of filing, is: **date of filing**

\_\_\_\_\_ (not prior to, nor more than 30 days after, the filing of these Articles of Organization)

Name and Address of Authorized Person:  
**John T. Holmes, sole member**

\_\_\_\_\_ *443 HOPE ST*  
\_\_\_\_\_ *BRISTOL, RI 02809*

Under penalty of perjury, I declare and affirm that I have examined these Articles of Organization, including any accompanying attachments, and that all statements contained herein are true and correct.

Date: 1-25-13

  
\_\_\_\_\_  
Signature of Authorized Person





# State of Rhode Island and Providence Plantations

**A. Ralph Mollis**

*Secretary of State*

## STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

I, A. RALPH MOLLIS, Secretary of State of the State of Rhode Island  
and Providence Plantations, hereby certify that this document, duly  
executed in accordance with the provisions of Title 7 of the General Laws  
of Rhode Island, as amended, has been filed in this office on this day:

A handwritten signature in black ink that reads "A. Ralph Mollis".

A. RALPH MOLLIS

*Secretary of State*



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS  
401 NORTH STREET, ROOM 206  
P.O. BOX 8722  
HARRISBURG, PA 17105-8722  
WWW.CORPORATIONS.STATE.PA.US/CORP

Front Line Power Solutions, LLC

THE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT WWW.CORPORATIONS.STATE.PA.US/CORP OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 4172292

Mary Dubitsky LicenseLogix, LLC  
150 Grand st. 4th Floor  
White Plains, NY 10601

PENNSYLVANIA DEPARTMENT OF STATE  
CORPORATION BUREAU

Application for Registration - Foreign  
(15 Pa.C.S.)

- Registered Limited Liability General Partnership (§ 8211)  
 Registered Limited Liability Limited Partnership (§ 8211)  
 Limited Partnership (§ 8582)  
 Limited Liability Company (§ 8981)

Name		
Mary Dubitsky LicenseLogix, LLC		
Address		
150 Grand St. 4th Floor White Plains NY 10601		
City	State	Zip Code

Commonwealth of Pennsylvania  
APPLICATION FOR REGISTRATION 3 Page(s)



T1307764028

Fee: \$250

In compliance with the requirements of the applicable provisions (relating to registration), the undersigned, desiring to register to do business in this Commonwealth, hereby states that:

1. The name of the limited liability company/limited liability partnership/limited partnership in the jurisdiction in which it is formed: <u>Frontline Power Solutions, LLC</u>
2. The name under which the limited liability company/limited liability partnership/limited partnership proposes to register and do business in this Commonwealth is: <u>Frontline Power Solutions, LLC</u>
3. The name of the jurisdiction under the laws of which it was organized and the date of its formation: Jurisdiction: <u>RI</u> Date of Formation: <u>1/13/2013</u>
4. The (a) address of its initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is: (a) Number and street City State Zip County  (b) Name of Commercial Registered Office Provider County <u>National Registered Agents, Inc.</u> <u>Dauphin</u>

PA DEPT. OF STATE

PA DEPT. OF STATE 22 2013

MAR 11 2013

DSCB:15-8981/8211/8582-2

5. Check and complete one of the following:

The address of the office required to be maintained by it in the jurisdiction of its organization by the laws of that jurisdiction is:

251 Thames St. Bristol RI 02809

Number and street	City	State	Zip

It is not required by the laws of its jurisdiction of organization to maintain an office therein and the address of its principal office is:

Number and street	City	State	Zip

6. ~~For Restricted Professional Limited Liability Company Only. Strike out if inapplicable: The company is a restricted professional company organized to render the following professional service(s):~~

---

**Limited Liability Partnership and Limited Partnership: Complete paragraphs 7 and 8**

7. The name and business address of each general partner.

Name	Business Address

8. The address of the office at which is kept a list of the names and addresses of the limited partners and their capital contribution is:

Number and street	City	State	Zip	County

The registered partnership hereby undertakes to keep those records until its registration to do business in the Commonwealth is canceled or withdrawn.

IN TESTIMONY WHEREOF, the undersigned has caused this Application for Registration to be signed by a duly authorized officer/member or manager thereof this

11 day of Feb. 2013

Frontline Power Solutions LLC  
Name of Partnership/Company

[Signature]  
Signature

CEO.  
Title



Corporations ▾ Search Business Entities (corpsearch.aspx) Search UCC Transactions (uccsearch.aspx) Forms ▾

Contact Corporations (<http://www.dos.pa.gov/BusinessCharities/Pages/default.aspx>)

Login (<https://hub.business.pa.gov/login>)

Search entity / Select entity / **Order documents**

## Order Business Documents



Date: 06/07/2022

### Business Name History

Name	Name Type
Front Line Power Solutions, LLC	Current Name

### Business Entity Details Officers

Name	Front Line Power Solutions, LLC
Entity Number	4172292
Entity Type	Limited Liability Company
Status	Active
Citizenship	Foreign
Entity Creation Date	02/22/2013
Effective Date	02/22/2013
State Of Inc	RI
Address	%CORPORATION SERVICE COMPANY Dauphin

### Filed Documents

The information presented below is for your reference. To place an order you will need to log in. If you do not have a PENN File account, you may register for an account by clicking here ([/Account/Register\\_account](/Account/Register_account)).

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<input type="checkbox"/>	02/22/2013	Application for Registration 1	2	<input type="text" value="1"/>	\$3.00	<input type="text" value="0"/>	\$40.00				

Select	Date	Document	Pages	Plain Copy Quantity#	Price	Certified Copy Quantity#	Certified Copy Price	Microfilm #	Microfilm Start	Microfilm End	Line Total
<input type="checkbox"/>	03/16/2020	Amendment - Foreign Registration Statement 2	2	<input type="text" value="1"/>	\$3.00	<input type="text" value="0"/>	\$40.00				

Showing 1 to 2 of 2 entries

Previous  Next

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<input type="checkbox"/>	All Dates	All Plain Copies	4	Quantity # <input type="text" value="1"/>	\$12.00						

**Certified Documents**

Select	Date	Document	Pages	Quantity#	Price	Line Total
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<input type="checkbox"/>	06/07/2022	Index and Docket Report	1	<input type="text" value="1"/>	\$15.00	
<input type="checkbox"/>	06/07/2022	Index and Docket Certified Report	1	<input type="text" value="1"/>	\$55.00	

**Order Total :**

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# LOCALiQ

Erie Times- News  
The Daily American

PO Box 630531 Cincinnati, OH 45263-0531

## PROOF OF PUBLICATION

Frontline Power Solutions  
Po Box 63  
Bristol RI 02809-0063

STATE OF PENNSYLVANIA, COUNTY OF ERIE

The Erie Times-News is a newspaper of general circulation, whose principal place of business is at 205 W 12<sup>th</sup> Street, Erie, Pennsylvania. That a copy of the printed notice, hereto attached, is exactly as the same was printed and published in the regular edition of the Erie Times-News, published in the issue dated:

05/13/2022

Sworn to and subscribed before on 05/13/2022

\_\_\_\_\_  
Legal Clerk

\_\_\_\_\_  
Notary, State of WI, County of Brown

7/27/20

My commission expires

Publication Cost: \$298.08

Order No: 7285371

# of Copies:

Customer No: 755169

-1

PO #:

**THIS IS NOT AN INVOICE!**

*Please do not use this form for payment remittance.*

SARAH BERTELSEN  
Notary Public  
State of Wisconsin

### PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Applications of Frontline Power Solutions, LLC. (d/b/a "Frontline Power Solutions") For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania. Frontline Power Solutions, LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a broker/marketer engaged in the business of providing natural gas services. Frontline Power Solutions, LLC will also be filing an application with the PUC for a license to supply electricity or electric generation services as a (1) broker/marketer engaged in the business of supplying electricity. Frontline Power Solutions, LLC proposes to sell electricity, natural gas, and related services in Columbia Gas, National Fuel Gas, PECO, Peoples Natural Gas, Peoples Gas Company, Philadelphia Gas Works, UGI Utilities, Valley Energy, Citizens' Electric, Duquesne, Met Ed, Peco, Penelec, Penn Power, Pike, PPL, UGI, Welsboro, West Penn 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 Frontline Power Solutions, 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 Frontline Power Solutions, LLC. attorney at the address listed below. By and through Counsel: Timothy C. Cavazza Frontline Power Solutions, LLC PO Box 631, Bristol, RI 02801 401-240-0152 info@fpsenergy.com (5-7285371-NT-13)

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION  
NOTICE

PO Box 631  
Bristol, RI 02809  
401-240-0152  
info@fpsenergy.com

*Applications of Frontline Power Solutions, LLC. (d/b/a "Frontline Power Solutions") For Approval To Offer, Render or Furnish Services as a Supplier, Aggregator, and Marketer/Broker Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public in The Commonwealth Of Pennsylvania*

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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Frontline Power Solutions, 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 Frontline Power Solutions, LLC, attorney at the address listed below

By and through Counsel:  
Timothy C. Cavazza  
Frontline Power  
Solutions, LLC.







# The Patriot News

## LEGAL AFFIDAVIT

AD#: 0010331501

Commonwealth of Pennsylvania,) ss  
County of Cumberland)

Christine Arnold 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 05/12/2022

Principal Clerk of the Publisher

Sworn to and subscribed before me this 12th day of May 2022

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

### PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Applications of **Frontline Power Solutions, LLC**, (d/b/a "Frontline Power Solutions" ) For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.

**Frontline Power Solutions, LLC** will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a broker/marketer engaged in the business of providing natural gas services. **Frontline Power Solutions, LLC** will also be filing an application with the PUC for a license to supply electricity or electric generation services as a (1) broker/marketer engaged in the business of supplying electricity. **Frontline Power Solutions, LLC** proposes to sell electricity, natural gas, and related services in Columbia Gas, National Fuel Gas, PECO, Peoples Natural Gas, Peoples Gas Company, Philadelphia Gas Works, UGI Utilities, Valley Energy, Citizens' Electric, Duquesne, Met Ed, Peco, Penelec, Penn Power, Pike, PPL, UGI, Welsboro, West Penn 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 **Frontline Power Solutions, 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 **Frontline Power Solutions, LLC**, attorney at the address listed below.

By and through Counsel: Timothy C. Cavazza

**Frontline Power Solutions, LLC**,  
PO Box 631, Bristol, RI 02809 |  
401-240-0152 | info@fpsenergy.com

# The Philadelphia Inquirer

801 MARKET STREET, SUITE 300, PHILADELPHIA, PA 19107

## Affidavit of Publication

On Behalf of:  
FRONTLINE POWER SOLUTIONS  
3 SHANNON CT  
SUITE 310  
BRISTOL, RI 02809

STATE OF PENNSYLVANIA COUNTY OF PHILADELPHIA:

Before the undersigned authority personally appeared the undersigned who, on oath represented a and say: that I am an employee of The Philadelphia Inquirer, LLC, and am authorized to make this affidavit of publication, and being duly sworn, I depose and say:

1. The Philadelphia Inquirer, LLC is the publisher of the Philadelphia Inquirer, with its headquarters at 801 Market Street, Suite 300, Philadelphia, Pennsylvania 19107.
2. The Philadelphia Inquirer is a newspaper that which was established in in the year 1829, since which date said daily newspaper has been continuously published and distributed daily in the City of Philadelphia, count and state aforesaid.
3. The printed notice or publication attached hereto set forth on attached hereto was published in all regular print editions of The Philadelphia Inquirer on

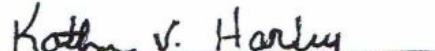
### Legal Notices

as published in Inquirer Legals in the issue(s) of:

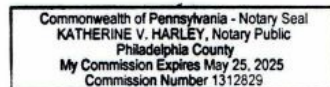
5/18/2022

4. Under oath, I state that the following is true and correct, and that neither I nor The Philadelphia Inquirer, LLC have any is interest in the subject matter of the aforesaid notice or advertisement.



  
Katherine V. Harley  
Notary Public

My Commission Expires:



Ad No: 104133  
Customer No: 114683

## COPY OF ADVERTISEMENT

### PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Applications of **Frontline Power Solutions, LLC. (d/b/a "Frontline Power Solutions")** For Approval To Offer, Render, or Furnish Services as a **Supplier, Aggregator, and Marketer/Broker** Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.

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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Frontline Power Solutions, 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 Frontline Power Solutions, LLC. attorney at the address listed below.

By and through Counsel: Timothy C. Cavazza  
**Frontline Power Solutions, LLC.**  
PO Box 631, Bristol, RI 0280 | 401-240-0152 |  
info@fpsenergy.com



### 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 T. Kopyar, 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:

**12 of May, 2022**

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:  
May 12, 2022



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

**STATEMENT OF ADVERTISING COSTS**

Frontline Power Solutions LLC  
PO Box 631  
Attn: John Holmes  
Bristol, Rhode Island 02809

To PG Publishing Company

Total ----- \$603.50

**Publisher's Receipt for Advertising Costs**

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office  
2201 Sweeney Drive  
CLINTON, PA 15026  
legaladvertising@post-gazette.com  
Phone 412-263-1440

PG Publishing Company, a Corporation, Publisher of  
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By  David A. Lockerbie

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

Attorney For

**COPY OF NOTICE OR PUBLICATION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE  
*Applications of Frontline Power Solutions, LLC. (d/b/a "Frontline Power Solutions") For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and Marketer/ Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.*  
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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Frontline Power Solutions, 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 Frontline Power Solutions, LLC. attorney at the address listed below.  
By and through Counsel:  
Timothy C. Cavazza  
Frontline Power Solutions, LLC.  
PO Box 631, Bristol, RI 02801 |  
401-240-0152  
info@fpsenergy.com

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

FRONTLINE POWER SOLUTIONS  
JOHN T HOLMES  
PO BOX 631 BRISTOL RI 02809

Account # 645286  
Order # 82633413  
Ad Price: 330.26

LEGAL NOTICE PENNSYLVANIA

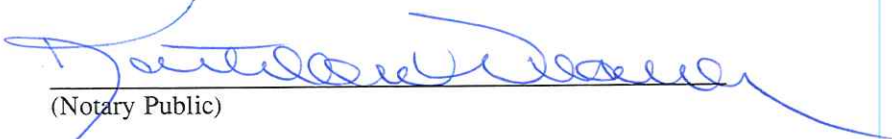
Sharon Venturi

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:

05/17/2022

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 20th day of May A.D., 2022

  
\_\_\_\_\_  
(Notary Public)

Commonwealth of Pennsylvania - Notary Seal  
Kathleen Weaver, Notary Public  
Lackawanna County  
My commission expires June 14, 2025  
Commission number 1314506  
Member, Pennsylvania Association of Notaries

**LEGAL NOTICE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE**  
Applications of **Frontline Power Solutions, LLC** (d/b/a "Frontline Power Solutions") For Approval To Offer, Render, or Furnish Services as a **Supplier, Aggregator, and Marketer/Broker** Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.  
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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Frontline Power Solutions, 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 **Frontline Power Solutions, LLC** attorney at the address listed below. By and through Counsel:  
Timothy C. Cavazza  
**Frontline Power Solutions, LLC**  
PO Box 631, Bristol, RI 0280  
401-240-0152  
info@fpsenergy.com



**WILLIAMSPORT SUN-GAZETTE  
PROOF OF PUBLICATION**

See Proof on Next Page

STATE OF PENNSYLVANIA  
COUNTY OF LYCOMING, CLINTON, SULLIVAN &  
TIOGA/BRADFORD SS:

Robert O. Rolley, Jr. Publisher of the Williamsport Sun-Gazette LLC publishes 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:

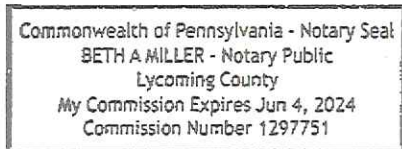
13 May 2022

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

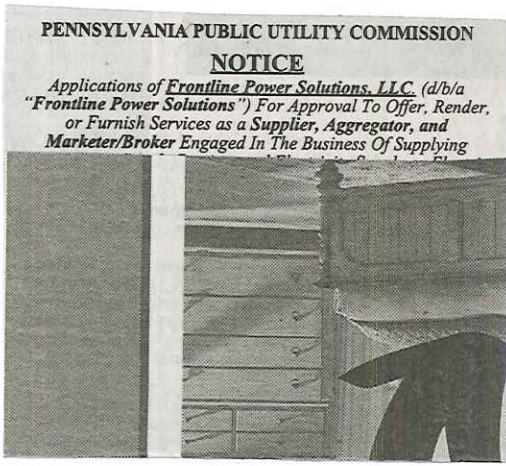
Robert O. Rolley, Jr.  
SUN-GAZETTE LLC

Sworn to and subscribed before me  
The 13<sup>th</sup> day of May, 2022

Beth A Miller  
Notary Public



**COMMONWEALTH OF PENNSYLVANIA** } SS  
*County of Cambria*



On this 20th day of May A.D. 2022, 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 continuously at Johnstown Pa. 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 May 20, 2022; 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 May, 2022,  
 by Christine Marhefka making the statement.

*Vivian Ohs*

0.00 Lines @ \$2.70 per line	0.00
8 Inches @ \$27.00 per inch	216.00
Notary Fee	5.00
Clerical Fee	2.50
<b>Total Cost</b>	<b>223.50</b>

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 *Vivian Ohs*



August 3, 2022

John Holmes  
Frontline Power Solutions LLC  
3 Shannon Ct Unit 310  
Bristol, RI 02809

Dear John Holmes:

We are pleased that Frontline Power Solutions LLC has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Frontline Power Solutions LLC could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. Frontline Power Solutions LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Frontline Power Solutions LLC does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to Frontline Power Solutions LLC changes in the future, Columbia Gas might deem it appropriate to require Frontline Power Solutions LLC to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4980 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

*Kylia Davis*

Kylia Davis  
Manager of Choice and Transportation Support Services



375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](http://www.peoples-gas.com)

**Carol Scanlon**  
Manager, Rates

**Peoples Service Company LLC**  
Phone: 412-208-6931  
Email: [Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com)

July 28, 2022

John Holmes  
CEO  
Frontline Power Solutions LLC  
3 Shannon Ct unit 310  
Bristol RI 02809

Dear Mr. Holmes:

We are pleased that Frontline Power Solutions LLC has applied for a license to provide natural gas services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC (formerly Peoples TWP) ("the Companies").

Since Frontline Power Solutions LLC is not currently serving customers on the Peoples systems, we have determined at this time that Frontline Power Solutions LLC does not need a bond or other financial security requirement to provide these services to the Company's customers.

If a Pool is established, and customers are enrolled which alters the creditworthiness requirement or the Company's exposure to Frontline Power Solutions LLC provision of services on the Peoples' system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

If you have any questions feel free to contact me at 412-208-6931 or by email at [Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com).

Sincerely,

Carol Scanlon  
Manager, Rates  
Peoples Natural Gas Company LLC

Cc: Stephen Kelly  
Mina Speicher





UGI Utilities, Inc.  
1 UGI Drive  
Denver, PA 17517

610-796-3400

**VIA E-MAIL**

August 2, 2022

Frontline Power Solutions, LLC  
3 Shannon Court  
Unit 310  
Bristol, RI 02809

**ATTENTION: John Holmes, Chief Executive Officer**

**RE: Frontline Power Solutions, LLC  
Application to Serve as a Natural Gas Broker**

Dear Mr. Holmes,

Based on your assertion that Frontline Power Solutions, LLC (“Frontline”) is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc.-Gas Division (“UGIU”) has concluded that Frontline will not need to post security with UGIU. This is based on the declaration that Frontline will be acting in conjunction with a licensed natural gas supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the UGIU Tariff. If Frontline wishes to directly serve Choice customers in the service territories of UGIU in the future as a natural gas supplier, it will have to post security as specified in the UGIU Tariff prior to the commencement of the service.

Please feel free to contact me with any additional questions you may have.

Sincerely,

Sherry Epler  
Senior Manager  
Tariff & Supplier Administration

SE/rks



# VALLEY ENERGY

523 S. Keystone Avenue, P.O. Box 340, Sayre, PA 18840  
800/998-4427 • 570/888-9664 • FAX 570/888-6199

August 3, 2022

**VIA EMAIL**

Frontline Power Solutions LLC  
Mr. John Holmes, CEO  
3 Shannon Ct Unit 310  
Bristol, RI 02809  
[johnholmes@frontlinepowersolutions.com](mailto:johnholmes@frontlinepowersolutions.com)

Dear Mr. Holmes:

We understand that Frontline Power Solutions LLC has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania including our company's service area.

Because Frontline Power Solutions LLC intends to only provide natural gas aggregating, brokering, and consulting services at this time, we have determined that Frontline Power Solutions LLC will not be required to post a bond or other form of financial security instrument to provide these services in our service area. However, if the services provided change in the future, we reserve the right to require security from Frontline Power Solutions LLC as deemed appropriate.

If you have any questions, please contact Jamie Levering at 570-888-9664 (Ext. 5232).

Sincerely,

Edward E. Rogers  
President & CEO

EER/ss

cc: J. Levering, Valley Energy