

Response to PA PUC secretarial letter Docket No. A-2022-3032904

I, John T. Holmes, CEO, hereby state that the facts contained in this document 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 CIO

Date 11-18-2022



National Fuel

November 17, 2022

Frontline Power Solutions, LLC
Attn: John T Holmes, CEO/Owner
3 Shannon Ct, Unit 310
Bristol, RI 02829

Dear John,

National Fuel Gas Distribution Corporation (“NFGDC”) is aware Frontline Power Solutions, LLC (FPS) has filed an application with the Pennsylvania Public Utility Commission to supply natural gas service to the public in Pennsylvania and specifically within the service territory of NFGDC.

As you know, in making such an application, FPS must furnish acceptable security to each utility where FPS will do business. As such, under its tariff, NFGDC could require FPS to provide a bond or other financial security instrument in an amount that NFGDC determines to be appropriate.

However, you have indicated, and it is NFGDC’s understanding that FPS intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, FPS will never take title to any delivered natural gas, nor will it accept any customer payments or deposits.

Based upon your representations, NFGDC has determined that, at this time, FPS does not need to post a bond or other form of security to operate in its service territory. However, if the services provided by FPS change in the future, NFGDC reserves the right to require security from FPS as it deems appropriate.

If you have any questions concerning the foregoing, please contact me at 716-857-7541.

Yours truly,

Nicole Barker
Transportation Services Department