

# Stevens & Lee

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March 6, 2023

**VIA ELECTRONIC FILING**

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

**Re: Application of Symmetry Energy Solutions, LLC for Approval to Offer, Render,  
Furnish or Supply Natural Gas Supply Services as a Supplier  
Docket No. A-2023-\_\_\_\_\_**

Dear Secretary Chiavetta:

Enclosed for filing please find the Application of Symmetry Energy Solutions, LLC to provide service as a Supplier of Natural Gas Supply throughout the Commonwealth. Please note that Exhibits 3 and 4 to the Application and the Tax Certification Statement contain confidential information and have been marked as such. **Symmetry Energy Solutions, LLC respectfully requests confidential treatment of these Exhibits, and they are being uploaded through the Secretary's confidential filing portal.**

Symmetry Energy Solutions, LLC has published notice of this Application in the required newspapers, and Proofs of Publication are attached to the Application. The filing fee for the application has been submitted through the Secretary's online payment system.

Copies of this Application have been served on all of the Natural Gas Distribution Companies in the Commonwealth and the required statutory advocates, the Attorney General, and the Department of Revenue, in accordance with the attached Certificate of Service.

Thank you, and please feel free to contact me with any questions or concerns.

Sincerely,  
STEVENS & LEE



Michael A. Gruin, Esq.

Enclosures

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Symmetry Energy Solutions, LLC, for approval to offer, render, furnish, or supply natural gas supply services as a Supplier of natural gas services 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:

**Symmetry Energy Solutions, LLC**  
**9811 Katy Freeway, Suite 1400**  
**Houston, Texas 77024**  
**(888) 200-3788**  
**[www.symmetryenergy.com](http://www.symmetryenergy.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.

**CT Corporation**  
**600 North 2<sup>nd</sup> Street, Suite 401**  
**Harrisburg, Pennsylvania 17101**  
**(717) 931-5563**  
**EMAIL: [CentralTeam1@wolterskluwer.com](mailto:CentralTeam1@wolterskluwer.com)**  
**FAX: N/A**

- 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 and future inquiries should be addressed.

**NOTE:** To ensure timely receipt of regulatory information, a contact employed directly by the Applicant, and not a consultant, is preferred.

**Stacy Williams, SVP and General Counsel**  
**Symmetry Energy Solutions, LLC**  
**9811 Katy Freeway, Suite 1400**  
**Houston, Texas 77024**  
**(713) 304-0116**  
**[stacy.williams@symmetryenergy.com](mailto:stacy.williams@symmetryenergy.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.

**Michael A. Gruin**  
**Stevens & Lee**  
**17 N. 2<sup>nd</sup> Street, 16<sup>th</sup> Fl.**  
**Harrisburg, PA 17101**  
**T: (717) 255-7365**  
**F: (610) 988-0852**  
**[michael.gruin@stevenslee.com](mailto:michael.gruin@stevenslee.com)**

- 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.

**Stephen Farina, Vice President, Mass Markets**  
**Symmetry Energy Solutions, LLC**  
**52975 Van Dyke Ave, Suite 202**  
**Shelby Township, MI 48316**  
**(248) 654-6220**  
**Fax: N/A**  
**stephen.farina@symmetryenergy.com**

**Brian Harrison, Senior Vice President, Sales & Origination**  
**Symmetry Energy Solutions, LLC**  
**9811 Katy Freeway, Suite 1400**  
**Houston, Texas 77024**  
**(281) 369-5793**  
**Fax: N/A**  
**brian.harrison@symmetryenergy.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.

**See copies of Delaware LLC Registration and Pennsylvania Foreign LLC registration, attached hereto as Exhibit 1.**

### **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.

**Applicant does not have any affiliates that are currently applying to do business in Pennsylvania.**

- 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.

**Applicant previously operated under the name “CenterPoint Energy Services, Inc.”, with an address of:**

1111 Louisiana St, B-241  
Houston, TX 77002  
www.centerpointenergy.com  
(800) 752-8036

On June 1, 2020, CenterPoint Energy, Inc. (NYSE: CNP) sold CenterPoint Energy Services, Inc. to an affiliate of Energy Capital Partners, LLC, a private equity, and credit investor specializing in energy infrastructure projects. In connection with the closing of the transaction, CenterPoint Energy Services, Inc changed its name to Symmetry Energy Solutions, LLC.

#### 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.

**Applicant will provide natural gas supply to all classes of customers in the Commonwealth.**

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

Columbia

National Fuel Gas

PECO

Peoples Natural Gas Company - Peoples Natural Gas Division

Peoples Natural Gas Company - Peoples Gas Division

All of the above

Philadelphia Gas Works

UGI Utilities – Gas Division

Valley Energy

- 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.

**September 1, 2023, or upon approval.**

## **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.

**Neither Symmetry Energy Solutions, LLC, nor any predecessor or person identified in the Application has been or is currently the defendant of a criminal or civil proceeding within the past 5 years.**

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

**None.**

- 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.

**Symmetry Energy Solutions, LLC has never had a PA PUC EGS or NGS license previously cancelled by the Commission. Neither the Applicant nor any affiliate or predecessor or person identified in the application has had any formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency it. Symmetry Energy Solutions, LLC has no existing, pending, or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigation or any other matter that could adversely impact its financial or operational status or ability to provide the services it is seeking certification to provide.**

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

**Not applicable.**

## **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

**Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement**  
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>  Daniel Czechowicz, Director – Gas Supply Administration  6363 Main Street  Williamsville, NY 14221  PH: 716.857.6917  e-mail: <a href="mailto:czechowiczd@natfuel.com">czechowiczd@natfuel.com</a></p>
<p><b>Peoples Natural Gas Company LLC – Peoples Natural Gas Division</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>Peoples Natural Gas Company LLC – Peoples Gas Division</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>  Suzette Adams. Sr. Manager, Gas Supply and Transportation  2301 Market Street, S-18  Philadelphia, PA 19103  PH: 215.841.6467  Email: <a href="mailto:Suzette.Adams@exeloncorp.com">Suzette.Adams@exeloncorp.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>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>	<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@centerprises.org">erogers@centerprises.org</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:
- 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.

**See Organizational Structure attached hereto as Exhibit 2**

**See Confidential Credit Report attached hereto as Confidential Exhibit 3.**

**See Confidential Financial Information attached hereto as Confidential Exhibit 4.**

- 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.

See Financial Information included with **Exhibit 4**, including letter from Applicant's parent company confirming the commitment to guaranty Applicant's payment obligations related to its operations in Pennsylvania.

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

**Not Applicable.**

- 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.

**Cecilia Heilmann, Vice President, Controller**  
**Symmetry Energy Solutions, LLC**  
**9811 Katy Freeway, Suite 1400**  
**Houston, Texas 77024**  
**(346) 293-7260**  
**Fax: N/A**

- 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.*

**See Attached Tax Certification Statement.**

## 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'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's upstream owner, Energy Capital Partners, is a private equity and credit investment firm that focuses on investing in the traditional and renewable power generation, midstream oil and gas, electric transmission, environmental infrastructure, and related energy services sectors of North America's energy infrastructure. Symmetry Energy Solutions, LLC has licenses, registrations, certificates, or other authorizations to sell natural gas at retail in Nevada, Nebraska, Ohio, Montana, California, Illinois, Iowa, Michigan. See copies of Licenses attached hereto as Exhibit 5.**

**Symmetry Energy Solutions, LLC is a leading energy supplier providing over 1 trillion cubic feet of natural gas to nearly 100,000 customers in over 30 states.**

**Applicant Key Technical Personnel:**

**Brian Harrison  
Vice President, Sales & Origination  
(281) 369-5793  
brian.harrison@symmetryenergy.com**

**Brian Harrison has 20+ years' experience leading strategic operations and sales within financial services and energy businesses. Prior roles include Intercontinental Exchange (ICE), Constellation, Credit Suisse and Castleton Commodities. In his current role as VP of Sales & Origination, he is responsible for development and execution of Symmetry Energy Solutions' business development and commercial**

strategies. Symmetry's portfolio currently spans 30 states serving about 9,000 commercial, industrial, and utility customers, and about 60,000 residential customers, with over 1.2 Tcf annual volume. Brian holds a BS in chemical engineering from MIT.

Stephen Farina  
Vice President, Mass Markets  
(248) 654-6220  
[stephen.farina@symmetryenergy.com](mailto:stephen.farina@symmetryenergy.com)

Stephen Farina is responsible for mass markets sales, business development efforts, pricing, operations including customer service and billing and contracting systems, and financial performance in Symmetry's six choice program states. Mr. Farina has been with Symmetry and its predecessor companies for thirteen years, with the majority of that time in roles servicing Customer Choice programs. He has also held positions in C&I sales leadership, pricing, product development, supply coordination, sales channel management, and expansion efforts. Outside of work, Mr. Farina is involved in leadership for multiple local non-profit organizations and community outreach programs. Mr. Farina holds a Bachelor of Science in Business Finance with a Minor in Applied Technology in Business from Oakland University.

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.

**Applicant will contract with a third-party vendor to conduct third party verifications using telephone and/or electronic means that comply with the requirements of 52 Pa. Code 111.7.**

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.

**Symmetry Energy Solutions will use both in-house staff and third-party sales companies to solicit customers.**

**All agents communicating with customers regarding possible enrollment will be trained on the following subjects as required by 52 Pa. Code § 111:**

**(1) State and Federal laws and regulations that govern marketing, telemarketing, consumer protection and door-to-door sales, including consumer protection regulations in Chapters 54 and 62 (relating to electricity generation customer choice; and natural gas supply customer choice), applicable**

provisions in Chapters 56, 57 and 59 (relating to standards and billing practices for residential utility service; electric service; and gas service) and the act.

- (2) Responsible and ethical sales practices
- (3) Symmetry's products and services.
- (4) Symmetry's rates, rate structures and payment options.
- (5) The customer's right to rescind and cancel contracts.
- (6) The applicability of an early termination fee for contract cancellation
- (7) The necessity of adhering to the script and knowledge of the contents of the script if one is used.
- (8) The proper completion of transaction documents.
- (9) Symmetry's disclosure statement.
- (10) Terms and definitions related to energy supply, transmission and distribution service as found in the dictionary of utility terms
- (11) Information about how customers may contact Symmetry to obtain information about billing, disputes, and complaints.
- (12) The confidentiality and protection of customer information and §§ 54.43(d) and 62.114 (relating to standards of conduct and disclosure for licensees).

To the extent that Symmetry uses any outside sales vendors for sales to residential or small commercial customers, Symmetry will thoroughly vet all prospective vendors and require multiple trade references to ensure that only reputable, experienced vendors market on behalf of Symmetry. Any sales vendor hired will be required to confirm its ability to comply with the Pennsylvania-specific agent training and oversight requirements outlined above. All vendors will be monitored for sales compliance, and Symmetry will develop a quality assurance monitoring program to contact a significant sample of all new mass market customers. Vendors who demonstrate an inability to adhere to Symmetry's standards and/or the Commission's regulations will be immediately terminated.

For any contracts with residential or small commercial customers based on sales performed by an agent, Symmetry will also utilize a separate digital or telephonic verification process as required by 52 Pa. Code 111.7.

All customers will be provided with our toll-free number for ease of communication. We maintain a customer service center to support our retail customers.

- 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.

**Alan Dunlea, President, and CEO**  
Symmetry Energy Solutions, LLC  
9811 Katy Freeway, Suite 1400  
Houston, Texas 77024  
(281) 973-7146  
[alan.dunlea@symetryenergy.com](mailto:alan.dunlea@symetryenergy.com)

**John Williamson, Executive Vice President, Chief Financial Officer**  
Symmetry Energy Solutions, LLC  
9811 Katy Freeway, Suite 1400  
Houston, Texas 77024  
(281) 768-4156  
[john.williamson@symmetryenergy.com](mailto:john.williamson@symmetryenergy.com)

**Brian Harrison, Vice President, Sales & Origination**  
Symmetry Energy Solutions, LLC  
9811 Katy Freeway, Suite 1400  
Houston, Texas 77024  
(281) 369-5793  
[brian.harrison@symmetryenergy.com](mailto:brian.harrison@symmetryenergy.com)

See Resumes attached hereto as Exhibit 6

**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.

**SEE Residential and Small Commercial Disclosure Statement attached as EXHIBIT 7**

**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 - Peoples Natural Gas Division 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 – Peoples Natural Gas Division	X			X			X
Peoples Natural Gas – Peoples Gas Division				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)*

**SEE PROOFS OF PUBLICATION ATTACHED AS EXHIBIT 8**

**13. SIGNATURE**

Applicant: Symmetry Energy Solutions, LLC

By: Stacy Williams

Title: SVP and General Counsel

**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: Symmetry Energy Solutions, LLC

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

PUC Secretary's Bureau Use



Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Texas :

ss.

County of Harris :

Stacy Williams, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the General Counsel (Office of Affiant) of Symmetry Energy Solutions, LLC (Name of Applicant);]

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

That the Applicant herein Symmetry Energy Solutions, LLC has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein Symmetry Energy Solutions, LLC has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

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

That the Applicant herein Symmetry Energy Solutions, LLC 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.

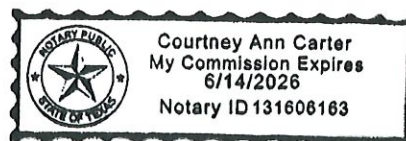
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Signature]  
Signature of Affiant

Sworn and subscribed before me this 1 day of March, 2023.

[Signature]  
Signature of official administering oath

My commission expires 6/14/2026



Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Texas :

: ss.

County of Harris :

Stephen Fanina, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Vice President (Office of Affiant) of Symmetry Energy Solutions, LLC (Name of Applicant);]

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

That Symmetry Energy Solutions, LLC, 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.

That Symmetry Energy Solutions, LLC, 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.

That Symmetry Energy Solutions, LLC, 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)**

That Symmetry Energy Solutions, LLC, 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 1 day of march, 2023.

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

My commission expires 6/14/2024.



**EXHIBIT 1**

**Delaware Certificate of Formation and Pennsylvania Foreign LLC  
Registration**

# Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CONVERSION OF A DELAWARE CORPORATION UNDER THE NAME OF "CENTERPOINT ENERGY SERVICES, INC." TO A DELAWARE LIMITED LIABILITY COMPANY, CHANGING ITS NAME FROM "CENTERPOINT ENERGY SERVICES, INC." TO "SYMMETRY ENERGY SOLUTIONS, LLC", FILED IN THIS OFFICE ON THE TWENTY-SEVENTH DAY OF MAY, A.D. 2020, AT 8:04 O`CLOCK A.M.*



  
Jeffrey W. Bullock, Secretary of State

2552708 8100V  
SR# 20204698801

Authentication: 202996437  
Date: 05-27-20

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

*Execution Version*

**CENTERPOINT ENERGY SERVICES, INC.  
CERTIFICATE OF CONVERSION  
FROM CORPORATION  
TO LIMITED LIABILITY COMPANY**

**Dated as of May 27, 2020**

Pursuant to Section 266 of the Delaware General Corporation Law (the “*DGCL*”) and Section 18-214 of the Delaware Limited Liability Company Act, the undersigned, acting as an authorized person on behalf of CenterPoint Energy Services, Inc., a Delaware corporation (the “*Company*”), hereby executes this Certificate of Conversion from Corporation to Limited Liability Company (this “*Certificate*”) to convert the Company into a Delaware limited liability company. The undersigned certifies as follows:

1. The Company was originally incorporated as a Delaware corporation on October 18, 1995.
2. Immediately prior to the filing of this Certificate, the name of the Company was “CenterPoint Energy Services, Inc.”
3. Concurrently with the filing of this Certificate, (i) a Certificate of Formation will be filed with the Delaware Secretary of State on behalf of the Company, and (ii) the name of the Company will be changed to “Symmetry Energy Solutions, LLC”.
4. The conversion of the Company into a Delaware limited liability company has been approved by the board of directors and the sole stockholder of the Company in accordance with Section 266 of the DGCL.

IN WITNESS WHEREOF, the undersigned has executed this Certificate as of the day and year first above written.

CENTERPOINT ENERGY SERVICES, INC.

DocuSigned by:  
*Joe Vortherms*  
By: \_\_\_\_\_  
CA66B9B76F74D4...  
Joseph J. Vortherms  
President and Director

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 08:04 AM 05/27/2020  
FILED 08:04 AM 05/27/2020

SR 20204698801 - File Number 2552708

# Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "SYMMETRY ENERGY SOLUTIONS, LLC" FILED IN THIS OFFICE ON THE TWENTY-SEVENTH DAY OF MAY, A.D. 2020, AT 8:04 O`CLOCK A.M.*



  
Jeffrey W. Bullock, Secretary of State

2552708 8100V  
SR# 20204698801

Authentication: 202996437  
Date: 05-27-20

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

*Execution Version*

**CERTIFICATE OF FORMATION  
OF  
SYMMETRY ENERGY SOLUTIONS, LLC**

This Certificate of Formation of Symmetry Energy Solutions, LLC (the "**LLC**"), dated as of May 27, 2020, is being duly executed and filed by Joseph J. Vortherms as an authorized person to form a limited liability company under the Delaware Limited Liability Company Act (6 Del. C. §18-101, et seq.).

**FIRST.** The name of the limited liability company formed hereby is Symmetry Energy Solutions, LLC.

**SECOND.** The address of the registered office of the LLC in the State of Delaware is c/o The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

**THIRD.** The name and address of the registered agent for service of process on the LLC in the State of Delaware is The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

**IN WITNESS WHEREOF**, the undersigned has executed this Certificate of Formation as of the date first above written.

DocuSigned by:

*Joe Vortherms*

\_\_\_\_\_  
CAC8D0B975C74D4...  
Joseph J. Vortherms  
Authorized Person



**Pennsylvania Department of State**  
Bureau of Corporations and Charitable Organizations  
PO Box 8722 | Harrisburg, PA 17105-8722  
T: 717-787-1057  
dos.pa.gov/BusinessCharities

**Regarding:** Symmetry Energy Solutions, LLC  
**Request Type:** Certificate of Registration  
**Request No.:** 008191122  
**Receipt No.:** 337260  
**Filing Type:** Foreign Limited Liability Company  
**Filing Subtype:** Limited Liability Company  
**Initial Filing Date:** October 25, 1996  
**Status:** Active

**Issuance Date:** January 18, 2023  
**File No:** 0002721033

**TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:**

I DO HEREBY CERTIFY THAT

Symmetry Energy Solutions, LLC

is a foreign association duly registered to do business in this Commonwealth as of the issuance date herein.

I DO FURTHER CERTIFY THAT this Certificate of Registration shall not imply that all fees, taxes and penalties owed to the Commonwealth of Pennsylvania are paid.



IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the seal of my office to be affixed, the day and year above written.

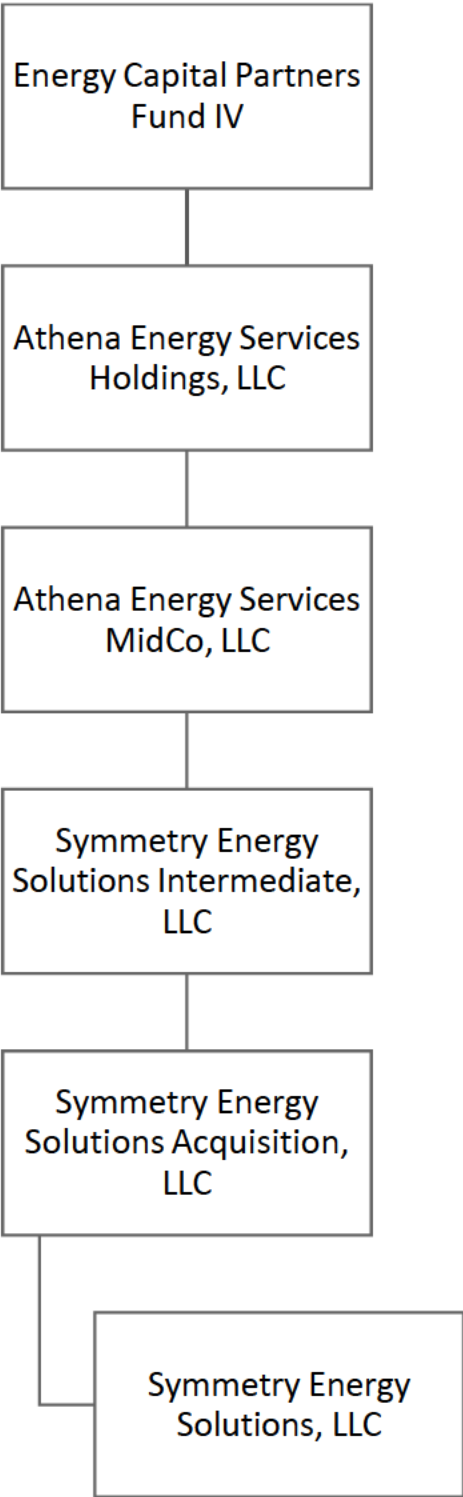
A handwritten signature in cursive script, appearing to read "Albert Schmidt".

**Albert Schmidt**

Acting Secretary of the Commonwealth

Verify this certificate online at [www.file.dos.pa.gov](http://www.file.dos.pa.gov)

**EXHIBIT 2**  
**Organizational Structure**



**EXHIBIT 5**  
**Copies of State Licenses**

PUBLIC UTILITIES COMMISSION OF NEVADA

LICENSE

Symmetry Energy Solutions, LLC

License No. G-33 Sub I  
(supersedes and replaces  
License No. G-33)  
Docket No. 20-05020

The Public Utilities Commission of Nevada ("Commission") hereby grants CenterPoint Energy Services, Inc. the authority to change its name to Symmetry Energy Solutions, LLC and to continue to operate as an Alternative Seller of only discretionary service within the State of Nevada under the name Symmetry Energy Solutions, LLC.

This License authorizes Symmetry Energy Solutions, LLC to provide only discretionary service for the sale of natural gas to generating, industrial, or large commercial customers.

This License is not transferable. Nothing contained in this License shall be construed to create a franchise or to constitute the granting of an irrevocable license. Failure to comply with all applicable provisions of the Nevada Revised Statutes; all applicable rules, regulations, and orders of the Commission; and the terms, conditions, and limitations attached to this License shall comprise sufficient grounds for the suspension or revocation of this License.

This License supersedes and replaces, in all respects, License No. G-33. License No. G-33 is hereby cancelled.

This License shall not be conveyed or transferred without the Commission's prior approval.

By the Commission,



HAYLEY WILLIAMSON, Chair




C.J. MANTHE, Commissioner

(Abstained)

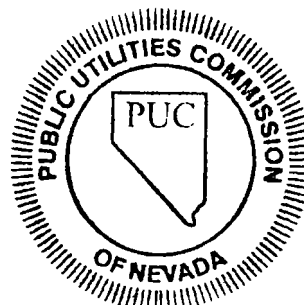
TAMMY CORDOVA, Commissioner

Attest:

  
TRISHA OSBORNE,  
Assistant Commission Secretary

Dated: Carson City, Nevada

11/15/20  
(SEAL)



**NEBRASKA PUBLIC SERVICE COMMISSION  
APPLICATION TO CHANGE NAME**

**PURPOSE**

The following form is for informational purposes only, and intended only to assist Applicants in the completion of their application. If any difference exists between this document and any law, regulation or case law, then such law, regulation or case law shall control.

All jurisdictional utilities and competitive natural gas providers (CNGPs) certificated by the Nebraska Public Service Commission shall provide an application and filing fee as set forth below in order to change the name under which services are provided.

Applicants seeking approval of a name change shall submit an *original and eight (8) copies of the application* to the Commission to the address below.

Executive Director  
Nebraska Public Service Commission  
300 The Atrium, 1200 N Street  
P.O. Box 94927  
Lincoln, NE 68509-4927

CNGPs/Aggregators should include a **\$125 application fee**. Jurisdictional utilities need not include a fee as costs will be directly assessed to them.

The application fee is required to cover the administrative costs of accepting and processing a filing. In addition, each Applicant may be assessed additional costs and expenses reasonably attributable to the application consistent with Neb. Rev. Stat. § 66-1840. Notice of the application will be published in the Daily Record, Omaha, Nebraska.

Applicants **must notify** the Commission during the pendency of the certification request of any material change in the representations and commitments required by this subsection **within 14 days** of such change.

Questions should be directed to the Natural Gas Department of the Nebraska Public Service Commission at (402) 471-3101.

PROVIDER HOLDING AUTHORITY:		
Current Company Name:	Docket Number Granting Operating Authority:	For Commission's use
CenterPoint Energy Services, Inc.	NG - 0049	
Any d/b/a of Company and Associated Docket Nos.:		
Continuum Retail Energy Services, LLC and Post Rock Gas, LLC (NG-0014 .1); CenterPoint Energy Service Retail, LLC (NG0049.2)		
Names Company Previously Provided Service Under and Associated Docket Nos.:		
		<p><b>RECEIVED</b> By Deena Ackerman at 1:26 pm, Jun 03, 2020</p>

**NEBRASKA PUBLIC SERVICE COMMISSION  
APPLICATION TO CHANGE NAME**

<b>PROVIDER CONTACT INFORMATION:</b>		
Legal Contact Name:		
<b>Debora K. Churches</b>		
Legal Contact Address:		
1111 Louisiana Street, 11th Floor Houston, TX 77002		
Legal Contact Phone Number:	Legal Contact Fax Number:	Legal Contact Email Address:
<b>713-207-5777</b>		<b>Debora.Churches@Centerpointenergy.com</b>
Regulatory Contact Name:		
<b>Debora K. Churches</b>		
Regulatory Contact Address:		
1111 Louisiana Street, 11th Floor Houston, TX 77002		
Regulatory Contact Phone Number:	Regulatory Contact Fax Number:	Regulatory Contact Email Address:
<b>713-207-5777</b>		<b>Debora.Churches@Centerpointenergy.com</b>
Questions Regarding this Application Should be Directed to (Contact Name):		
<b>Debora K. Churches</b>		
Contact Address:		
1111 Louisiana Street, 11th Floor Houston, TX 77002		
Contact Phone Number:	Contact Fax Number:	Contact Email Address:
<b>713-207-5777</b>		<b>Debora.Churches@Centerpointenergy.com</b>

NEBRASKA PUBLIC SERVICE COMMISSION  
APPLICATION TO CHANGE NAME

PROPOSED NAME CHANGE:

Symmetry Energy Solutions, LLC

DATE PROPOSED NAME APPROVED BY SECRETARY OF STATE:

May 27, 2020

ANY CHANGES TO d/b/a of COMPANY:

OTHER INFORMATION:

Applicant *shall* attach evidence of authority to do business in Nebraska, certificates of registration by the Nebraska Secretary of State for all approved trade names under which the applicant will operate, and the applicant's state of incorporation and any further information that may assist the Commission in evaluating this application.



**NEBRASKA PUBLIC SERVICE COMMISSION  
APPLICATION TO CHANGE NAME**

REPRESENTATIVE SUBMITTING NOTICE	
Name:	<b>Rob Ellis III</b>
Title:	<b>VP, Sales</b>
Signature of Applicant or Applicant's Attorney (Print completed PDF form and sign): <i>RE</i>	
Date:	<i>6/2/20</i>

VERIFICATION	
I, <u><b>Rob Ellis III</b></u> , being of proper age and duly sworn, states that I am the <u><b>VP, Sales</b></u> of Applicant, that I have read the foregoing Application, that I am familiar with the contents thereof, and that such is true, accurate, and correct to the best of my knowledge.	
Name:	<b>Rob Ellis III</b>
Title:	<b>VP, Sales</b>
Signature (Print completed PDF form and sign): <i>RE</i>	
Date:	<i>6/2/20</i>

STATE OF TENNESSEE )  
 ) ss.  
COUNTY OF Williamson )

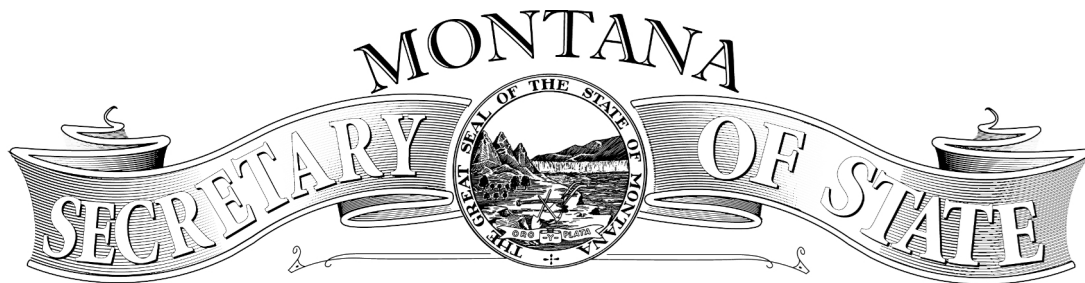
SUBSCRIBED AND SWORN to before me this 2 day of June, 2020

Witness my hand and official seal.



*Crystal Williams*

Notary Public



## CERTIFICATE OF AUTHORIZATION

I, **CHRISTI JACOBSEN**, Secretary of State for the State of Montana, do hereby certify that on **September 15, 2020**, this office issued a Certificate of Authority to:

### **SYMMETRY ENERGY SOLUTIONS, LLC**

A foreign limited liability company organized under the laws of the State or Province of **Delaware**, for a duration of **perpetual**, to transact business and conduct affairs in the State of Montana.

Payment is reflected in the records of the Secretary of State for all fees owed to the Secretary of State.

No certificate of withdrawal or revocation has been placed on the record in this office by said limited liability company and the records indicate the limited liability company is in good standing under the laws of the State of Montana.

The Secretary of State cannot certify that tax and penalties owed to this state on record with the Department of Revenue are current. Please contact the Department of Revenue at (406) 444-6900 to obtain information on the tax status.



IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Great Seal of the State of Montana, at Helena, the Capital, this 9th day of February, 2023

*Christi Jacobsen*

**Christi Jacobsen**  
Montana Secretary of State  
Certificate Number: 36315828



Michigan Public Service Commission  
4300 West Saginaw Highway  
Lansing, MI 48917

**RE: Name Change of CenterPoint Energy Services, Inc. to  
Symmetry Energy Solutions, LLC  
Case No. U-16527**

This notice is provided to inform the Commission about changes to the information provided in CenterPoint Energy Services, Inc.'s ("CenterPoint") license to operate as an alternative gas supplier in Case No. U-16527. On June 1, 2020, CenterPoint was indirectly acquired by an affiliate of Energy Capital Partners, a private equity and credit investment firm with over \$19 billion in capital commitments focused on investing in the power generation, midstream gas, electric transmission and energy and environmental services sector of North America's energy infrastructure. As a result of such acquisition, CenterPoint is no longer affiliated with CenterPoint Energy, Inc. As such, CenterPoint has converted to a limited liability company and changed its name to Symmetry Energy Solutions, LLC ("Symmetry"). A copy of the conversion and name change issued by the Delaware Secretary of State is attached hereto. Symmetry will continue to operate as an alternative gas supplier to customers in Michigan pursuant to the license issued in Case No. U-16527. Should you have any questions about the foregoing, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink that reads "Debora K. Churches".

---

Debora K. Churches  
Senior Counsel | Symmetry Energy Solutions, LLC  
1111 Louisiana St, 11<sup>th</sup> Floor  
Houston, TX 77002  
713.207.5777

Attachment

# Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CONVERSION OF A DELAWARE CORPORATION UNDER THE NAME OF "CENTERPOINT ENERGY SERVICES, INC." TO A DELAWARE LIMITED LIABILITY COMPANY, CHANGING ITS NAME FROM "CENTERPOINT ENERGY SERVICES, INC." TO "SYMMETRY ENERGY SOLUTIONS, LLC", FILED IN THIS OFFICE ON THE TWENTY-SEVENTH DAY OF MAY, A.D. 2020, AT 8:04 O`CLOCK A.M.*



  
Jeffrey W. Bullock, Secretary of State

2552708 8100V  
SR# 20204698801

Authentication: 202996437  
Date: 05-27-20

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

**CENTERPOINT ENERGY SERVICES, INC.  
CERTIFICATE OF CONVERSION  
FROM CORPORATION  
TO LIMITED LIABILITY COMPANY**

**Dated as of May 27, 2020**

Pursuant to Section 266 of the Delaware General Corporation Law (the “*DGCL*”) and Section 18-214 of the Delaware Limited Liability Company Act, the undersigned, acting as an authorized person on behalf of CenterPoint Energy Services, Inc., a Delaware corporation (the “*Company*”), hereby executes this Certificate of Conversion from Corporation to Limited Liability Company (this “*Certificate*”) to convert the Company into a Delaware limited liability company. The undersigned certifies as follows:

1. The Company was originally incorporated as a Delaware corporation on October 18, 1995.
2. Immediately prior to the filing of this Certificate, the name of the Company was “CenterPoint Energy Services, Inc.”
3. Concurrently with the filing of this Certificate, (i) a Certificate of Formation will be filed with the Delaware Secretary of State on behalf of the Company, and (ii) the name of the Company will be changed to “Symmetry Energy Solutions, LLC”.
4. The conversion of the Company into a Delaware limited liability company has been approved by the board of directors and the sole stockholder of the Company in accordance with Section 266 of the DGCL.

IN WITNESS WHEREOF, the undersigned has executed this Certificate as of the day and year first above written.

CENTERPOINT ENERGY SERVICES, INC.

DocuSigned by:  
*Joe Vortherms*  
By: \_\_\_\_\_  
©AC6BDB976F74D4...  
Joseph J. Vortherms  
President and Director

# Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "SYMMETRY ENERGY SOLUTIONS, LLC" FILED IN THIS OFFICE ON THE TWENTY-SEVENTH DAY OF MAY, A.D. 2020, AT 8:04 O`CLOCK A.M.*



  
Jeffrey W. Bullock, Secretary of State

2552708 8100V  
SR# 20204698801

Authentication: 202996437  
Date: 05-27-20

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

*Execution Version*

**CERTIFICATE OF FORMATION  
OF  
SYMMETRY ENERGY SOLUTIONS, LLC**


This Certificate of Formation of Symmetry Energy Solutions, LLC (the "**LLC**"), dated as of May 27, 2020, is being duly executed and filed by Joseph J. Vortherms as an authorized person to form a limited liability company under the Delaware Limited Liability Company Act (6 Del. C. §18-101, et seq.).

FIRST. The name of the limited liability company formed hereby is Symmetry Energy Solutions, LLC.

SECOND. The address of the registered office of the LLC in the State of Delaware is c/o The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

THIRD. The name and address of the registered agent for service of process on the LLC in the State of Delaware is The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle County, Delaware 19801.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation as of the date first above written.

DocuSigned by:  
  
CAC8D0B975E74D4...  
Joseph J. Vortherms  
Authorized Person

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\* \* \* \* \*

In the matter of the application of	)	
<b>CENTERPOINT ENERGY SERVICES, INC.,</b>	)	Case No. U-16527
for a license as an alternative gas supplier.	)	
_____	)	

At the May 26, 2011 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Orjiakor N. Isiogu, Chairman  
Hon. Monica Martinez, Commissioner  
Hon. Greg R. White, Commissioner

**ORDER**

On January 19, 2011, CenterPoint Energy Services, Inc. (CES), applied for a license to operate as an alternative gas supplier (AGS) within Michigan, pursuant to 2002 PA 634 (Act 634), MCL 460.9 *et seq.* As part of its application, CES provided information to demonstrate compliance with the AGS license requirements under Act 634 and under the Commission’s March 12, 2003 order in Case No. U-13694 (March 12 order). The March 12 order established the AGS licensing procedure.

Act 634 requires an AGS to have the necessary financial, managerial, and technical capabilities to serve customers within the state of Michigan. The act also requires an AGS to maintain an office within the state. Under the March 12 order, the Commission Staff (Staff) must review the application of the AGS for conformance with the act and with the Commission’s



orders. The Staff must then recommend appropriate action regarding that application to the Commission.

The Staff reviewed the license application and the information submitted by CES and has recommended this company be granted a license to operate as an AGS.

The application shows that CES provides comprehensive natural gas sales and services to industrial and commercial customers, and is actively marketing these sales in 18 states. CES serves a combined total of over 11,000 gas supply customers in these states and in 2009 it marketed 504 billion cubic feet (Bcf) of natural gas to its customers. CES is presently a licensed AGS in Indiana and Pennsylvania and currently has 42 transportation customer accounts in Michigan.

CES is registered with the Michigan Corporation Division, ID # 649392. The Staff reviewed CES's personnel descriptions and histories and observes that CES's key personnel have well over 50 combined years of experience in the energy industry and in business services. Based upon that review, the Staff determined that CES has sufficient experience and expertise to manage risk and to reliably supply natural gas in Michigan's gas customer choice market.

Based upon the information provided and the recommendation of the Staff, the Commission finds that CES possesses the appropriate managerial and technical capabilities to serve customers within the state of Michigan.

In its review of CES's financials, the Staff found that the company's balance sheet and income statement were satisfactory. CES has provided the Staff with a bond of \$100,000. Based upon its review of the financial statements and the satisfied bond requirement, the Staff determined that CES's financial capabilities meet Act 634 requirements. The Commission agrees.

Act 634 requires CES to maintain an office within the state of Michigan. CES does not currently have a Michigan office, but will establish one upon becoming licensed in the state and will notify the Staff in writing of the address prior to engaging in any marketing activity. The Staff supports CES's proposal. The Commission agrees.

Based upon the submissions and other information provided, the Commission finds that CES's request to be licensed as an AGS is reasonable and in the public interest, and that it should be approved. However, the grant of the license is conditioned upon compliance with all of the applicable provisions of Act 634, the Commission's orders and administrative rules, and each of the delivering natural gas utilities' tariffs. Failure to comply with any of these provisions may result in revocation of the license or other penalties.

THEREFORE, IT IS ORDERED that:

- A. CenterPoint Energy Services, Inc. is granted a license as an alternative gas supplier.
- B. CenterPoint Energy Services, Inc. shall comply with the regulatory requirements specified in 2002 PA 634, MCL 460.9 *et seq.*; the Commission's orders and administrative rules approved by the Commission; and each of the delivering natural gas utilities' tariffs.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, under MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION

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Orjiakor N. Isiogu, Chairman

---

Monica Martinez, Commissioner

---

Greg R. White, Commissioner

By its action of May 26, 2011.

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Mary Jo Kunkle, Executive Secretary

# P R O O F   O F   S E R V I C E

STATE OF MICHIGAN    )

Case No. U-16527

County of Ingham        )

Mignon Middlebrook being duly sworn, deposes and says that on May 26, 2011 A.D. she served a copy of the attached Commission orders by first class mail, postage prepaid, or by inter-departmental mail, to the persons as shown on the attached service list.

---

Mignon Middlebrook

Subscribed and sworn to before me  
This 26<sup>th</sup> day of May 2011

---

Gloria Pearl Jones  
Notary Public, Ingham County, MI  
My Commission Expires June 5, 2016

Service List U-16527

CenterPoint Energy Services, Inc.  
30600 Telegraph Road  
Bingham Farms MI 48205

Mickey S. Moon  
Assitant General Counsel  
CenterPoint Energy, Inc.  
1111 Louisiana Street, Suite 4600  
Houston TX 77002

Eric Sullivan  
Division Vice President of Retail Marketing  
CenterPoint Energy Services, Inc.  
1111 Louisiana Street, Suite 2000  
Houston TX 77002

635170



PAUL D. PATE  
Secretary of State  
State of Iowa

LIMITED LIABILITY COMPANY  
APPLICATION FOR  
CERTIFICATE OF AUTHORITY

TO THE SECRETARY OF STATE OF THE STATE OF IOWA:

Pursuant to section 802 of the *Iowa Revised Uniform Limited Liability Company Act*, the undersigned applies for a certificate of authority to transact business in Iowa and hereby states:

1. The name of the limited liability company: Symmetry Energy Solutions, LLC

1A. The name the limited liability company will use in Iowa, if different than the legal name of the company named above:

(Refer to note #6 on the back of this form)

2. The limited liability company is formed under the laws of the state (or foreign country) of:  
Delaware

3. The duration of the limited liability company is: Perpetual

4. Date of formation is: October 18, 1995

5. The street and mailing address of its registered office in Iowa and the name of its registered agent at that office:

C T Corporation System  
Name

400 East Court Avenue Des Moines, IA 50309  
Address City State Zip

The registered office and registered agent comply with the requirements of section 489.113.\*

6. The street address of its principal office:

1111 Louisiana Street  
Address

Houston, Texas 77002  
City State Zip

7. (A) This foreign limited liability company is governed by an operating agreement that establishes or provides for the establishment of designated series of transferable interests having separate rights, powers, or duties with respect to specified property or obligations of the foreign limited liability company, or profits and losses associated with the specified property or obligations.  YES  NO

(B) All debts, liabilities, and obligations incurred, contracted for, or otherwise existing with respect to a particular series, if any, are enforceable against the assets of such series only, and not against the assets of the foreign limited liability company generally.  YES  NO

IOWA SECRETARY OF STATE

8. Indicate if the limited liability company is a member-managed or manager-managed limited liability company by marking the appropriate box. State the name, street and mailing address of one member/manager.

Member Managed  OR Manager Managed

Symmetry Energy Solutions Acquisition, LLC

Name

1111 Louisiana Street, Houston, Texas 77002

Address

City

State

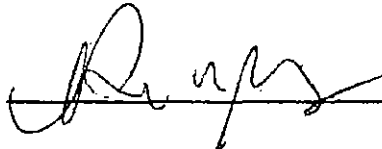
Zip

9. The effective date and time of this application, if different than the date and time of filing (Refer to note #5 on instruction page)

Date \_\_\_\_\_ Time \_\_\_\_\_

10. A certificate of existence or a record of similar import, signed by the secretary of state or other official having custody of the company's publicly filed report in the state or other jurisdiction under whose law the company is formed, accompanies this application.

Signature



Date

6/25/2020

Type or print name and title Donna Poresky, Senior Vice President of Symmetry Energy Solutions Acquisition, LLC, its Sole Member

# Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "SYMMETRY ENERGY SOLUTIONS, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FOURTH DAY OF JUNE, A.D. 2020.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN PAID TO DATE.

FILED  
IOWA  
SECRETARY OF STATE

6-26-20  
9:39AM  
W01272439



tificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

A handwritten signature in black ink, appearing to read "JBULLOCK", written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 203051331

Date: 06-04-20



**OFFICIAL FILE**

AGS Reporting Form: To be submitted annually by January 31

**ORIGINAL**

**ILLINOIS COMMERCE COMMISSION**

AGS Annual (2023) Recertification under 83 IL Adm. Code 551

**Section 551. 120 General Procedures for Reporting Continuing Compliance with Certification Requirements**

- a) An AGS shall continue to remain in compliance with the provisions of the Act and this Part, as now or hereafter amended. If an AGS received a certificate before the effective date of any provision of this Part, that provision applies to applicants seeking certification to serve residential or small commercial customers with the same natural gas demand or usage characteristics as the AGS serves, the AGS shall demonstrate that it has come into compliance with such provision no later than January 31 of the year following the year during which such amendment took effect.
- b) All reports required under this Part shall be under oath and shall be filed with the Chief Clerk of the Commission with copies provided to the Commission's Director of the Energy Division or its successor and the Commission's Director of the Financial Analysis Division or its successor. The reports shall be identified with the name of the AGS as it appears in the most recent Commission order granting the AGS certification.
- c) All reports made to the Commission by an AGS, and the contents thereof shall be open to public inspection, unless otherwise ordered by the Commission. Such reports shall be preserved in the office of the Commission.

Each AGS shall submit a report identified with the name of the AGS as it appears in the most recent Commission order granting the AGS certification.

AGS Name (including all d/b/a): **Symmetry Energy Solutions, LLC (f/k/a CenterPoint Energy Services, Inc.)**

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ICC Docket # for current certification: **13-0440**

Contact person for issues related to processing the AGS continuing compliance reports:

Name: **Mr. Stacy Williams**

Title: **Senior Vice President and General Counsel**

Direct Telephone Number: **(713) 304-0116**

Email Address: **legal@symmetryenergy.com and stacy.williams@symmetryenergy.com**

Mailing Address: **9811 Katy Freeway, Suite 1400; Houston, TX 77024**

AGS Street Address:

**Symmetry Energy Solutions, LLC**

**9811 Katy Freeway, Suite 1400**

**Houston, TX 77024**

**RECEIVED**

JAN 30 2023

**ILLINOIS COMMERCE COMMISSION  
CHIEF CLERK'S OFFICE**

Affiliated Companies Name, Contact information, and Address:

**Not applicable**

### **Section 551.140 Financial Reporting Requirements**

The AGS shall provide a copy of only those documents that the AGS requires to demonstrate that it continues to possess sufficient financial resources to serve the residential or small commercial customers for which it has received a certificate of service authority. The AGS will identify the subsection of Code Part 551.80 that the ARES currently meets. (e.g. Section 551.80(a, b, c, d, e, f, or g) The applicable documents shall be submitted at the times specified below:

- a) An AGS that seeks to demonstrate that it maintains sufficient financial resources to provide the services for which it has received a certificate of service authority using the criteria set forth in Section 551.80(a) shall submit an updated copy of a Dun & Bradstreet Business Information Report that demonstrates, at a minimum, that the AGS has a Composite Credit Appraisal of “3” or lower and a PAYDEX score of “70” or higher. If the AGS does not have a Dun & Bradstreet Composite Credit Appraisal, the AGS shall file an updated copy of an Experian Small Business Intelliscore report that demonstrates, at a minimum, that the AGS has an Intelliscore of “63” or higher. The applicable updated report shall be filed between January 1 and January 31 of each year. The report shall be no more than 30 days old at the date of the annual filing.
  
- b) An AGS that seeks to demonstrate that it maintains sufficient financial resources to provide the services for which it has received a certificate of service authority using the criteria set forth in Section 551.80(b), (c), (d)(4), (d)(6), (e)(1), (e)(3), or (f) shall submit a copy of the latest ratings report presenting the short-term or long-term credit or obligation ratings of the AGS, creditors, affiliates, or guarantors, as applicable, from the ratings agencies between January 1 and January 31 of each year and within 15 days following any downgrade of such ratings previously filed with the Commission to a rating below A-1 or A-, if issued from Standard & Poor's or its successor, P-1 or A3, if issued from Moody's Investors Service or its successor, or F-1 or A-, if issued from FitchRatings or its successor. Within 30 days after a downgrade of the short-term or long-term credit or obligation ratings of the AGS or its creditors, affiliates, or guarantors, as applicable, to a level below the minimum required under this Part, the AGS shall submit a report that identifies the subsection under which the AGS is seeking to demonstrate that its financial resources remain sufficient for providing the services for which it has received a certificate of service authority and includes the information and documents that subsection requires.

- c) An AGS that seeks to demonstrate that it maintains sufficient financial resources to provide the services for which it has received a certificate of service authority using the criteria set forth in Section 551.80(c), (d), (e), or (f) shall submit a copy of any modified, replacement or additional borrowing agreements, unconditional guarantees, lines of credit, revolving credit agreements, payment bonds, and letters of credit, as applicable, at least 15 days in advance of any modification, cancellation or expiration of the financial agreements.

**Symmetry Energy Solutions, LLC has sufficient financial resources to be certified as an alternative gas supplier to serve the residential and small commercial customers for the service territory granted in Docket No. 13-0440. Attached is a Payment Bond issued pursuant to 83 Ill. Admin. Code 551.80(e)(2). See Attachment A.**

- d) Between January 1 and January 31 of each year, an AGS that seeks to use the criteria specified in Section 551.80(d) to demonstrate that it maintains sufficient financial resources to provide the services for which it has received a certificate of service authority shall provide the maximum daily amount of natural gas scheduled in dekatherms during the previous calendar year and the date on which that amount was scheduled. If the AGS has been serving Illinois residential or small commercial customers for less than 12 months, the AGS shall also provide an estimate of the maximum daily amount of natural gas in dekatherms it will schedule during the current calendar year.
- e) An AGS that seeks to demonstrate that it maintains sufficient financial resources to provide the services for which it has received a certificate of service authority using the criteria set forth in Section 551.80(c), (d), (f), or (g) shall submit a copy of its certified financial statements, or those of its parent, and accountant's report, as applicable, within 120 days after the close of its fiscal year.
- f) An AGS that has contracted to acquire customer accounts from another AGS shall, at least 15 days in advance of any acquisition, demonstrate that it maintains sufficient financial resources to provide the service for which it has received a certificate of service authority using the criteria set forth in Section 551.80(c), (d) or (f) and providing an estimate of the amount of revenue expected from the customer accounts under contract to be acquired, including supporting documents.

### **Section 551.150 Managerial Reporting Requirements**

An AGS shall certify during January of each year that it continues to maintain the required managerial qualifications for the service authority granted in its certificate. An AGS that meets the managerial qualifications requirements by entering into one or more contracts with others to provide the required services must identify each agent or contractor on whom the AGS relies to meet the requirements of this Part and must certify that the agent or contractor will comply with all Sections of this Part applicable to the function or functions to be performed by the respective agent or contractor.

**Symmetry Energy Solutions, LLC continues to maintain the required managerial qualifications for the service authority granted in Docket No. 13-0440. Please see the updated qualifications of Symmetry Energy Solutions' personnel pursuant to Section 551.100 in Attachment B.**

#### **Section 551.160 Technical Reporting Requirements**

An AGS shall certify during January of each year that it continues to maintain the required technical qualifications for the service authority granted in its certificate. An AGS that meets the technical qualifications requirements by entering into one or more contracts with others to provide the required services must identify each agent or contractor on whom the AGS relies to meet the requirements of this Part and must certify that the agent or contractor will comply with all Sections of this Part applicable to the function or functions to be performed by the respective agent or contractor.

**Symmetry Energy Solutions, LLC continues to maintain the required technical qualifications for the service authority granted in Docket No. 13-0440. Please see the updated qualifications of Symmetry Energy Solutions' personnel pursuant to Section 551.90 in Attachment C.**

#### **Section 551.170 Information Reporting Requirements**

No later than March 1 of every year, each AGS shall file with the Chief Clerk of the Commission, and provide to the Commission's Director of the Energy Division or its successor, a report stating the total annual dekatherms delivered and sold to residential and small commercial customers within each utility service territory in the preceding calendar year and the total revenues associated with the sale of natural gas to residential and small commercial customers within each utility service territory in the preceding calendar year. An AGS shall also provide any information and answer any questions upon request of the Commission.

PLEASE SUBMIT THE ANNUAL DEKATHERM REPORT (NO LATER THAN MARCH 1 OF EVERY YEAR) SEPARATE FROM THE PART 551 CONTINUING COMPLIANCE REPORT.

#### **Annual License or Permit Bond Requirements**

Each AGS must certify that the most recent copy of its license or permit bond on file with the Commission is current and in full effect. In the event that a license or permit bond is modified, the AGS shall file a copy of the modified bond with the Chief Clerk of the Commission and provide a copy of that bond to the Commission's Director of the Financial Analysis Division or its successor at least 15 days in advance of the effective date of the modification pursuant to Section 55150(c). The filing shall include a cover letter that explains the purpose of the filing and shall be identified by the name of the AGS as it appears in the most recent Commission order granting the AGS certification.

In the event that a license or permit bond is cancelled, expires or is drawn upon, the AGS shall execute and maintain an additional or replacement bond such that the cumulative value of all outstanding bonds never falls below the amount required in subsection (a) of this Section. The AGS shall file a copy of the additional or replacement bond with the Chief Clerk of the Commission and provide a copy to the Commission's Director of the Financial Analysis Division or its successor at least 15 days in advance of the effective date of the bond pursuant to Section 55150(b). The filing shall include a cover letter that

explains the purpose of the filing and shall be identified by the name of the AGS as it appears in the most recent Commission order granting the AGS certification.

**Symmetry meets the requirement under Section 551.50 that Symmetry secure and maintain a license or permit bond. Please see Attachment D for Symmetry's current License or Permit Bond which was filed with the ICC on February 1, 2021.**

**Please send the signed and notarized annual reports to:**

Chief Clerk's Office  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

*Separate copies for the Safety & Reliability Division, Financial Analysis Division may be placed in same envelope and the Chief Clerk's Office will distribute them. Please mark each copy as a "Copy" and include one the of the division titles for each copy as applicable.*

VERIFICATION

STATE OF TEXAS

COUNTY OF HARRIS

Stacy Williams, being first duly sworn, deposes and says that she/he is **Senior Vice President and General Counsel** for **Symmetry Energy Solutions, LLC**; that he has read the foregoing **Annual AGS Continuing Compliance Report** of **Symmetry Energy Solutions, LLC**, and all of the attachments accompanying and referred to within the **Annual AGS Continuing Compliance Report**; and that the statements and information contained in the **Annual AGS Continuing Compliance Report** and the attachments are true, correct and complete to the best of his knowledge, information and belief. **Symmetry Energy Solutions, LLC** will remain in continuing compliance with all requirements of the Illinois Public Utilities Act and 83 IL Adm. Code 551.

*Stacy Williams*

Signature

*Stacy Williams*

Name

*Senior Vice President & General Counsel*

(Corporate Officer of AGS) Position Held

*713-304-0116*

Contact Phone #

Subscribed and sworn before me

This 26 day of January 2023.

*Desiree H Molloy*  
Notary Public



**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
REGISTRATION CERTIFICATE  
TO OPERATE AS A  
CORE TRANSPORT AGENT**



**CTA NO.: CTA0028**

CenterPoint Energy Services, Inc.  
1111 Louisiana Street  
Houston, TX 77002

The above named Core Transport Agent, having made written application to the Public Utilities Commission of the State of California to register its operations as a Core Transport Agent mandated by Senate Bill (SB) 656 and pursuant to Commission Decision (D.) 14-08-043, dated August 28, 2014, is granted this certificate of registration authorizing its operations in the State of California, subject to the following conditions:

- (1) Is said Core Transport Agent fails to update their registration information set forth in paragraphs (1) to (10), inclusive, of subdivision (a) of Section 981 within 60 days of any material change in the information provided.
- (2) Pursuant to future legislation, the Core Transport Agent may be required to publish its registration number on all service contracts, billing documents and advertising materials.
- (3) This registration certificate is subject to suspension or cancellation as provided by Section 980 of the Public Utilities Code.
- (4) Said Core Transport Agent shall comply with all Commission orders, rules, directions and requirements governing Core Transport Agents.
- (5) An annual fee as authorized by the Commission for Core Transport Agents which shall be paid to the Commission within 30 days of billing.

**Dated this day: June 10, 2016**

**California Public Utilities Commission - Energy Division**



## **Competitive Retail Natural Gas Service Provider or Governmental Aggregator Certificate**

Certified Entity:

Symmetry Energy Solutions, LLC

9811 Katy Freeway, Suite 1400  
Houston, 77024

Certificate Number: **16-530G**

**Effective Date: August 19, 2022**

**Expiration Date: August 19, 2024**

Issued Pursuant to Case Number(s):  
**16-1370-GA-CRS**

The above-referenced entity is hereby certified to provide competitive retail natural gas Retail Natural Gas Marketer services within the State of Ohio.

The certification of competitive retail natural gas service providers is governed by Chapters 4901:1-27, 4901:1-28, and 4901:1-29 of the Ohio Administrative Code, and Section 4929.20 of the Ohio Revised Code. This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

The certified entity is subject to all rules and regulations of the Public Utilities Commission of Ohio now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: **19 day of August, 2022.**



By Order of  
The Public Utilities Commission of Ohio

Tanowa M. Troupe, Secretary  
Debbie Ryan, Acting Secretary  
Susan Patterson, Acting Secretary



**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**8/25/2022 1:37:23 PM**

**in**

**Case No(s). 16-1370-GA-CRS**

Summary: Certificate Certificate No. 16-530G electronically filed by Ms. Alla  
Magaziner-Tempesta on behalf of PUCO staff

**EXHIBIT 6**  
**Officer Resumes**

# ALAN DUNLEA

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## **SYMMETRY ENERGY SOLUTIONS**

**2020 – Present**

### **President and Chief Executive Officer**

Serve as President and CEO leading a team of nearly 250 professionals operating a retail natural gas marketing business with approximately 100,000 industrial, commercial and residential customers in over 30 states across the U.S.

## **WHEELABRATOR TECHNOLOGIES**

**2015-2019**

### **Executive Vice President, Chief Financial Officer**

Served as the designated “right hand” to WTI’s CEO in providing strategic direction, overseeing diverse teams, and driving profitable growth of the 2nd largest energy-from-waste business in the U.S., comprising 27 energy-from-waste, ash monofill, and Independent Power Producer (IPP) facilities in the U.S. and U.K.

- Responsible for energy P&L (~40% of total revenue) across 6 different power markets in the U.S. and U.K., finance, accounting, global business development, risk management, and information technology for company with ~1,200 employees, \$1B in revenues, and \$380M EBITDA.
- Achieved #1 corporate strategic priority by raising ~\$1B in commercial bank debt to finance the construction of 3 new energy-from-waste facilities in the U.K. generating \$130M in transformational EBITDA growth.
- Led dual track monetization process including IPO and private sale options culminating in successful divestiture in 2019.

## **EQUIPOWER RESOURCES CORP.**

**2010-2015**

### **Executive Vice President, Chief Financial Officer**

Hired by ECP as CFO of their newest IPP business in Fund II following prior success as CFO of FirstLight in ECP’s initial fund.

- Worked collaboratively with CEO to establish and build out scalable growth platform from the ground up including new corporate office, new IT systems, and new lean organization.
- Created a portfolio of ~10,000 megawatts of power generation assets through a series of M&A transactions and bank financings across 14 assets in 5 different U.S. power markets.
- Built and led a talented team handling all accounting, tax, treasury, risk management, financing, shared services, and FP&A activities.
- Deeply involved in all M&A, integration, IPO, and divestiture initiatives, including co-leading a dual track monetization process (IPO/private sale) resulting in the successful sale of the business for ~\$3.5B in 2015

## **FIRSTLIGHT POWER RESOURCES**

**2006-2009**

### **Executive Vice President, Chief Financial Officer**

Brought on board by Energy Capital Partners, a newly formed energy infrastructure PE firm making its initial investment, to serve as CFO of FirstLight, an IPP comprising 16 hydro, pumped storage, coal, and natural gas-fired power generation assets.

- Partnered closely with new CEO to establish/expand lean, scalable platform capable of sustaining rapid, profitable growth.
- Emphasized business commercialization and performance optimization at all levels via organizational assessment; implementation of vital cultural improvements; sound governance; and strengthening of front-, middle-, and back-office teams.
- Helped deliver rapid EBITDA growth, facilitating successful divestiture for ~\$2B in 2008.

## **CONSTELLATION ENERGY COMMODITIES GROUP**

**2001-2006**

### **Managing Director**

Fulfilled critical financial and operational responsibilities as member of senior leadership team for Constellation Energy Commodities Group (CECG), a leading public wholesale energy origination and trading business, now owned by Exelon Corp.

- Played key role in supporting company’s significant growth in scale and diversity from 2001 to 2006 including new offices in Calgary, Houston, Portland and London.
- Provided essential support to commercial organization in assessing proposed trading and complex structured

transactions across physical and financial power, natural gas, coal, emissions and other energy derivative transactions.

- Held ownership of financial reporting as well as development and analysis of complex daily mark-to-market P&L for all of CECG's global trading and risk management businesses.

- Implemented SOX requirements at CECG as well as developed and implemented a new fully integrated trading and origination P&L reporting system.

- As CFO of Constellation Energy Partners, an upstream oil and gas business, helped take that company public on the NYSE in 2006

## **GOLDMAN SACHS**

**1996-2001**

### **Vice President**

As VP (Finance), handled multiple energy investments for Currency and Commodities Division, including new power marketing, and upstream oil and gas businesses in the U.S. and Canada.

## **PWC**

### **Senior Auditor**

**1991-1995**

Performed financial statement audits in Ireland and in the U.S. for private and public companies in manufacturing, retail, and financial services sectors.

---

## **EDUCATION**

---

### **Master of Business Administration in Finance**

Wharton School of the University of Pennsylvania

### **Bachelor of Commerce – BCom, Finance and Accounting**

University College Cork, Ireland

### **Qualified Chartered Accountant**

# Brian Harrison

---

**SYMMETRY ENERGY SOLUTIONS**, Houston, TX

2020 – Present

*A leading U.S. energy supplier, providing over 1 trillion cubic feet of natural gas to over 100,000 customers in over 30 states and asset management services to some of the largest consumers of natural gas in the U.S.*

## **SENIOR VICE PRESIDENT – SALES & ORIGATION**

Leads the sales and origination effort for Symmetry and manages a team of about sixty sales professionals. Participates as a member of the senior leadership team in strategic initiatives and decisions for the company.

**INTERCONTINENTAL EXCHANGE (NYSE:ICE)**, New York, NY

2010 – 2020

*A leading operator of regulated exchanges, clearing houses and data services, serving the risk management needs of global markets for all asset classes*

## **VICE PRESIDENT - DESKTOP AND MOBILE APPLICATIONS STRATEGY**

Directed the strategy, product management and sales for the desktop and mobile applications that comprise the front-end trading and risk management platform for ICE.

**LOUIS DREYFUS HIGHBRIDGE ENERGY**, Wilton, CT

2008 – 2010

*Commodities merchant that deploys capital across a portfolio of energy-related infrastructure assets.*

## **PORTFOLIO MANAGER, GLOBAL EMISSIONS TRADING DESK**

Initially recruited to expand global emissions trading desk and increase exposure to emissions markets globally. Transitioned to other markets in the face of regulatory changes that impacted existing opportunities and strategies in market for emissions credits.

**SARACEN ENERGY PARTNERS**, Houston, TX

2006 – 2008

*Engaged in physical and financial trading in the North American energy commodity markets.*

## **PORTFOLIO MANAGER**

Brought in to deploy \$100M capital allocation in the US emission credit market. Tasked with developing and executing cross-commodity trading strategies and overseeing the emissions, coal and weather derivatives trading businesses.

### **Earlier professional progression:**

**Vice President, Trading**, Credit Suisse, New York, NY

**Director, Trading**, Constellation Energy, Baltimore, MD

**Trader/Analyst**, AES New Energy, Boston, MA

**Management Consulting Analyst**, The Monitor Company, Cambridge, MA

## **Education**

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Massachusetts Institute of Technology  
Cambridge, MA

**BS, Chemical Engineering**; Minor: **Economics**

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# JOHN WILLIAMSON

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## **Symmetry Energy** – Houston, TX – 2020 – Present

*A leading U.S. energy supplier, providing over 1 trillion cubic feet of natural gas to over 100,000 customers in over 30 states and asset management services to some of the largest consumers of natural gas in the U.S.*

### **Chief Financial Officer**

Leads team of approximately 100 Finance and IT professionals responsible for Finance, IT, Risk, Accounting and Back-Office Operations.

## **APG&E** – Houston, TX – 2017 - 2020

*Privately-owned Retail Energy Provider based in Houston, TX with 250,000 residential customer equivalents.*

### **Chief Financial Officer**

Responsible for Finance, Operations, Legal, Regulatory and Compliance, and Human Resources.

## **JSW FINANCIAL CONSULTING & ADVISORY** – Houston, TX – 2016

*Privately led Energy Consultant providing consulting services to Retail Energy Provider and Brokers.*

### **Founder and Independent Consultant**

Built 5-year Financial and Strategic Plans for 4 Energy Retailers, Start-up Energy Broker, and HVAC services company.

## **CENTRICA / DIRECT ENERGY** – Multiple Locations – 2005-2015

*Centrica PLC is a top 30 FTSE 100 company based in the UK with 2014 revenue of £29 billion. Direct Energy is a subsidiary of Centrica and is the largest energy retailer in North America with 2014 revenue of \$20 billion.*

### **Chief Financial Officer, Direct Energy Residential**, Houston, TX (2014-2015)

Oversaw risk management, financial planning and analysis, business performance management, accounting and control, decision support, and other financial functions for largest residential retailer in the US.

### **Chief Financial Officer, Direct Energy Business**, Pittsburgh, PA (2010-2014)

Led team of 35 based out of Pittsburgh and Houston in financial planning and analysis, business performance management, accounting and control, product control, pricing, and decision support for the 2<sup>nd</sup> largest commercial retail energy supplier in North America.

### **Controller, Direct Energy Business**, Pittsburgh, PA (2009-2010)

### **Group Head of Financial Accounting & Reporting, Centrica**, Windsor, UK (2007-2009)

### **Controller, Technical & Accounting Services, Direct Energy**, Toronto, ON (2005-2007)

## **RBC** – 2000-2005

*Canada's largest bank with 2014 revenue of C\$34 billion.*

### **Manager, Finance and Derivatives Reporting, Corporate Treasury (2004-2005)**

### **Manager, Income Statement and Loans Reporting (2003-2004)**

### **Manager, Balance Sheet and Regulatory Reporting (2002-2003)**

**Assistant Manager, Technical Accounting and Advisory Services (2000-2002)**

**Grant Thornton International / Gardner Zuk Dessen Chartered Accountants – 1997-2000**

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**EDUCATION**

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**Chartered Accountant** (Canadian CA); Chartered Professional Accountant (Canadian CPA)

**Certified Public Accountant**, State of Pennsylvania (US CPA)

**Chartered Financial Analyst Level 2 Candidate** (Passed Level 1 December 2016)

**Master of Business Administration in Finance, 1997**

Schulich School of Business, YORK UNIVERSITY, Toronto, Ontario

**Bachelor of Arts in Economics, 1995**

YORK UNIVERSITY, Toronto, Ontario

**Professional Affiliations**

Member, Canadian Institute of Chartered Accountants (CICA)

Member, Pennsylvania Institute of Certified Public Accountants (PICPA)

**EXHIBIT 7**  
**Disclosure Statement**



**Symmetry Energy Solutions, LLC  
PENNSYLVANIA CUSTOMER CONTRACT SUMMARY  
FIXED PRICE NATURAL GAS SUPPLY**

<b>Natural Gas Supplier Information</b>	Symmetry Energy Solutions, LLC 9811 Katy Freeway, Suite 1400, Houston, TX 77024 PA PUC License No. _____ 888-200-3788, www.symmetryenergy.com You have chosen Symmetry Energy Solutions (“Symmetry”) as your natural gas supplier. Symmetry is not affiliated with your Natural Gas Distribution Company (“NGDC”). Symmetry is responsible for the natural gas supply charges on your bills. These charges will appear on your NGDC bills separate and apart from your NGDC’s distribution charges for delivering your natural gas.
<b>Price Structure</b>	<b>This is a Fixed Price Contract.</b>
<b>Natural Gas Supply Price</b>	The price that you will pay per therm or Ccf for natural gas during the Initial Term of this Agreement will be <RATE> <TERM>
<b>Statement Regarding Savings</b>	Symmetry’s price for natural gas may be higher or lower than the NGDC’s price in any given month, and there is no guarantee of savings.
<b>Deposit Requirements</b>	None
<b>Incentives/Promotions</b>	{TO BE DETERMINED. BOX TO BE REMOVED IF NO INCENTIVES PROVIDED}
<b>Contract Start Date</b>	This Agreement will begin on a date set by your Natural Gas Distribution Company (NGDC) which may be the first meter read after the NGDC completes your enrollment with Symmetry
<b>Contract Duration/Length</b>	The Initial Term of this Agreement is ___Billing Cycles, starting with the first month that you receive service from Symmetry.
<b>Cancellation/Early Termination Fee</b>	If Customer terminates prior to the end of the Initial Term, an Early Termination Fee (“ETF”) of \$10 for each month remaining in the Initial Term will be charged. For residential customers, the ETF will be no greater than \$100 if the remaining term is less than 12 months, and \$200 if the remaining term is more than 12 months
<b>End of Contract</b>	Following the Initial Term, your account will automatically renew month-to-month at a variable rate unless a different option is chosen. If you have a fixed duration contract approaching the expiration date, or whenever we propose to change the terms of service, you will receive two separate written notifications, the first approximately 60 to 75 days in advance and the second 45 days in advance of either the expiration date or the effective date of the proposed changes. These notifications will explain your options going forward.
<b>Right of Rescission</b>	Customer may rescind this Agreement with no termination fee by calling Symmetry at 1-888-200-3788 at any time before midnight of the third business day after receiving this disclosure statement

{CUSTOMER NAME}

**Symmetry Energy Solutions, LLC**

\_\_\_\_\_  
By:  
Title:  
Date:

\_\_\_\_\_  
By:  
Title:  
Date:

**SYMMETRY ENERGY SOLUTIONS, LLC**  
**Fixed Price Natural Gas Supply Disclosure Statement**

Background

This is an agreement between Symmetry Energy Solutions, LLC (“Symmetry”), an independent energy supplier, and the undersigned customer (“Customer”) under which Customer shall obtain natural gas supply service and begin enrollment with Symmetry (the “Agreement”). Symmetry is licensed by the Pennsylvania Public Utility Commission to offer and supply natural gas supply in Pennsylvania. Our PUC license number for natural gas supply is [REDACTED].

Your natural gas supply prices will be set by Symmetry. The Public Utility Commission regulates natural gas distribution prices and services.

You will receive a single bill from your Natural Gas Distribution Company (NGDC) that will contain the NGDC’s charges and Symmetry’s charges for natural gas supply. Your NGDC will continue to provide all emergency repairs and services. Symmetry is not affiliated with and does not represent your NGDC.

Right of Rescission. You may cancel this Agreement at any time before midnight of the third business day after receiving this disclosure statement by contacting Symmetry at 1-888-200-3788 or by email at [customerchoice@symmetryenergy.com](mailto:customerchoice@symmetryenergy.com).

Definitions: Commodity Charges - The charges for the natural gas product which is sold either in cubic feet or dekatherms. Nonbasic Charges: Not applicable to Symmetry.

1. **Agreement to Sell and Purchase Energy.** Subject to the terms and conditions of this Agreement, Symmetry agrees to sell and deliver, and Customer agrees to purchase and accept the quantity of natural gas, as estimated by Symmetry necessary to meet Customer’s requirements based upon consumption data obtained by Symmetry or the delivery schedule of the NGDC. Symmetry is not affiliated with and does not represent the NGDC. The amount of natural gas supplied under this Agreement is subject to change based upon data reflecting Customer’s consumption obtained by Symmetry or the NGDC’s delivery schedule. The NGDC will continue to deliver the natural gas supplied by Symmetry.
2. **Term.** The Initial Term of this Agreement will begin when you buy your natural gas commodity service for the above account(s) from Symmetry on the date set by your NGDC, and it will continue for XX months (“the Initial Term”).
3. **Pricing. This is a Fixed Price Contract.** The price that you will pay per therm or CCF for natural gas supply is set forth on your Contract Summary. Your Symmetry price may be higher or lower than the NGDC’s price in any particular month, and there is no guarantee of savings. Your price includes natural gas commodity charges and estimated total state taxes, but excludes Pennsylvania sales tax, if applicable. Symmetry may assign and sell Customer accounts receivable to the NGDC. Failure by a customer to make full payment of Symmetry charges due on any consolidated bill prepared by the NGDC for Symmetry will be grounds for disconnection of utility services in accordance with PA PUC rules and regulations on the termination of service to residential customers. Your NGDC maintains the right to terminate service for any unpaid utility or supplier charges, pursuant to the Pennsylvania Public Utility Commission’s regulations.
4. **Assignment.** Customer may not assign its interests in and delegate its obligations under this Agreement without the express written consent of Symmetry. Symmetry may sell, transfer, pledge, or assign the accounts, revenues, or proceeds hereof, in connection with any financing agreement or receivables purchase program, and may assign this Agreement to another energy supplier, energy services company or other entity as authorized by the PA PUC.
5. **Information Release Authorization.** Customer authorizes Symmetry to obtain and review information regarding Customer’s credit history from credit reporting agencies and standard information that is made available to suppliers from your NGDC. This information may be used by Symmetry to determine whether it will commence and/or continue to provide energy supply service to Customer and will not be disclosed to a third party unless required by law. Symmetry will maintain the confidentiality of the customer’s personal information including name, address, phone number, usage, and payment history as required by applicable PUC regulations and Federal and State law. Symmetry will not release the customer’s private confidential information to a third party without the customer’s express consent. This authorization will remain in effect during the Initial Term and any Renewal Term. Customer may rescind this authorization at any time by providing written notice thereof to Symmetry or by calling Symmetry at 1-888-200-3788. Symmetry reserves the right to cancel this Agreement in the event Customer rescinds the authorization.
6. **Cancellation.** A residential customer may cancel this Agreement at any time by contacting Symmetry at 1-888-200-3788 or by email at \_\_\_\_\_. If you cancel this agreement you will owe us for amounts unpaid up to the date of cancellation. Symmetry may cancel this agreement at any time upon providing 30 days’ advance written notice to Customer. Common reasons for Symmetry to cancel this agreement would include: Non-Payment – If your natural gas service is terminated by your NGDC, then this agreement is cancelled on the date that your natural gas service is terminated. You will owe us for amounts unpaid for our charges for natural gas supply service up to the date of termination by your NGDC. Customer Move – If the customer moves from the address listed above, this agreement is cancelled. If we cancel this agreement for any reason other than for customer non-payment, we will follow applicable rules in providing notice to you.
7. **Penalties, Fees and Exceptions.** If Customer terminates cancels prior to the end of the Initial Term, an ETF of \$10 for each month remaining in the Initial Term will be charged. For residential customers, the ETF will be no greater than \$100 if the remaining term is less than 12 months, and

\$200 if the remaining term is more than 12 months.

8. Agreement Expiration/Change in Terms. If you have a fixed duration contract approaching the expiration date, or whenever we propose to change the terms of service, you will receive two separate written notifications, the first approximately 60 to 75 days in advance and the second 45 days in advance of either the expiration date or the effective date of the proposed changes. These notifications will explain your options going forward. Unless another option is chosen, upon completion of the Initial Term, this Agreement will automatically renew on a month-to-month basis (the "Renewal Period") with no early termination fee under a variable rate.
  9. Final Bill. Customer acknowledges that in the event of a cancellation of this Agreement it may take several billing cycles for Customer to return to the NGDC or another supplier for supply service. Customer is liable for all Symmetry charges until Customer returns to the NGDC or goes to another supplier. A final bill will be rendered by the NGDC after the final scheduled meter reading or if access is unavailable, an estimate of consumption will be used in the final bill, which will be tried up subsequent to the final meter reading.
  10. Agency Natural Gas- Customer hereby designates Symmetry as agent to; (a) arrange and administer contracts and service agreements between Customer and Symmetry and between the interstate pipeline transporters; and (b) nominate and schedule with the interstate pipeline for the delivery of Customer's natural gas supplies to the Delivery Points, and with the NGDC for the transportation of Customer's natural gas supplies from the Delivery Points to the Customer's end-use premises; and (c) aggregate Customer's natural gas supplies with such suppliers of other customers served by Symmetry to maintain qualification for NGDC transportation service and resolve imbalances that may arise during the terms of this Agreement. Symmetry as agent for the Customer will schedule the delivery of adequate supplies of natural gas that meet the Customer's city gate requirements as established by the NGDC and in response to information provided by the NGDC. Symmetry agrees to arrange for the transportation of the natural gas supplied under this Agreement from the Delivery Points to the Customer's end-use premises. These services are provided on an arm's length basis and market-based compensation is included in the rate noted above.
  11. Title. Customer and Symmetry agree that title to, control of, and risk of loss to the natural gas supplied by Symmetry under this Agreement will transfer from Symmetry to Customer at the Delivery Point(s).
  12. Warranty. This Agreement, including any enrollment form and applicable attachments, as written makes up the entire Agreement between Customer and Symmetry. Symmetry makes no representations or warranties other than those expressly set forth in this Agreement, and Symmetry expressly disclaims all other warranties, express or implied, including merchantability and fitness for a particular use.
  13. Dispute Procedures-. In the event of a billing dispute or a disagreement involving Symmetry's service hereunder, the parties will use their best efforts to resolve the dispute. Customer should contact Symmetry by telephone or in writing, as provided below. If you are not satisfied after discussing your terms with us you may contact the Public Utility Commission (PUC) by phone at: 1-800-692-7380 or in writing at 400 North Street, Harrisburg, PA 17120.
  14. Contact Information:  
Symmetry Contact Information: Customer may contact Symmetry's Customer Service Center at 1-888-200-3788, Monday through Friday 9:00 a.m. - 5:00 p.m. EST (contact center hours subject to change). Customer may write to Symmetry at: 9811 Katy Freeway, Suite 1400, Houston, TX 77024 or email at \_\_\_\_\_.
- Public Utility Commission, 400 North Street, Harrisburg, PA 17120, Phone: 1-800-692-7380  
Information about shopping for a gas supplier is available at [www.PaGasSwitch.com](http://www.PaGasSwitch.com), by calling the Commission at 800-692-7380, and the Office of Consumer Advocate at (800) 684-6560 or [www.oca.state.pa.us](http://www.oca.state.pa.us).
15. Force Majeure. Symmetry will make commercially reasonable efforts to provide natural gas hereunder but Symmetry does not guarantee a continuous supply of natural gas to Customer. Certain causes and events out of the control of Symmetry ("Force Majeure Events") may result in interruptions in service. Symmetry will not be liable for any such interruptions caused by a Force Majeure Event, and Symmetry is not and shall not be liable for damages caused by Force Majeure Events. Force Majeure Events shall include acts of God, fire, flood, storm, terrorism, war, civil disturbance, accidents, strikes, labor disputes or problems, inability to access the local distribution utility system, non-performance by the NGDC (including, but not limited to, a facility outage on facilities), or any other cause beyond Symmetry's control.
  16. Liability. The remedy in any claim or suit by Customer against Symmetry will be solely limited to direct actual damages (which will not exceed the amount of Customer's single largest monthly invoice amount in the immediately preceding 12 months). All other remedies at law or in equity are hereby waived. In no event will either Symmetry or Customer be liable for consequential, incidental, indirect, special or punitive damages. These limitations apply without regard to the cause of any liability or damages. There are no third-party beneficiaries to this Agreement.
  17. **Arbitration. ALL CLAIMS ARISING UNDER OR RELATING TO THIS AGREEMENT ARE TO BE SETTLED BY BINDING ARBITRATION IN THE STATE OF PENNSYLVANIA OR ANOTHER LOCATION MUTUALLY AGREEABLE TO THE PARTIES. THE ARBITRATION SHALL BE CONDUCTED ON A CONFIDENTIAL BASIS PURSUANT TO THE COMMERCIAL ARBITRATION RULES OF THE AMERICAN ARBITRATION ASSOCIATION. ANY DECISION OR AWARD AS A RESULT OF ANY SUCH ARBITRATION PROCEEDING SHALL BE IN WRITING AND SHALL PROVIDE AN EXPLANATION FOR ALL CONCLUSIONS OF LAW AND FACT AND SHALL INCLUDE THE ASSESSMENT OF COSTS, EXPENSES, AND REASONABLE ATTORNEYS' FEES. ANY SUCH ARBITRATION SHALL BE CONDUCTED BY AN ARBITRATOR EXPERIENCED IN COMPETITIVE RETAIL ENERGY MARKET AND SHALL INCLUDE A WRITTEN RECORD OF THE ARBITRATION HEARING. THE PARTIES RESERVE THE RIGHT TO OBJECT TO ANY INDIVIDUAL**

**WHO SHALL BE EMPLOYED BY OR AFFILIATED WITH A COMPETING ORGANIZATION OR ENTITY. AN AWARD OF ARBITRATION MAY BE CONFIRMED IN A COURT OF COMPETENT JURISDICTION. CUSTOMER WILL NOT HAVE THE RIGHT TO PARTICIPATE IN A REPRESENTATIVE CAPACITY OR AS A MEMBER OF ANY CLASS OF CLAIMANTS PERTAINING TO ANY CLAIM SUBJECT TO ARBITRATION.**

18. Choice of Laws. Venue for any action brought to enforce any term or condition of this Agreement or to construe the terms hereof shall lie exclusively in the State of Pennsylvania. This Agreement shall be construed under and shall be governed by the laws of the State of Pennsylvania without regard to the application of its conflicts of law principles.

19. Taxes and Laws. Except as otherwise provided in the Agreement or provided by law, all taxes of whatsoever kind, nature and description due and payable with respect to service provided under this Agreement, other than taxes based on Symmetry's net income, shall be paid by Customer, and Customer agrees to indemnify Symmetry and hold Symmetry harmless from and against any and all such taxes.

20. Regulatory Changes. This Agreement is subject to present and future legislation, orders, rules, regulations or decisions of a duly constituted governmental authority having jurisdiction over this Agreement or the services to be provided hereunder. If at some future date there is a change in any law, rule, regulation, tariff, or regulatory structure ("Regulatory Change") which impacts any term, condition or provision of this Agreement including, but not limited to rate, Symmetry shall have the right to modify this Agreement, with the customer's consent for any term other than rate, to reflect such Regulatory Change by providing 30 days' written notice of such modification to the Customer.

21. Energy Credits and Subsidies. Notwithstanding anything to the contrary, to the extent Symmetry is obligated as a result of new requirements to purchase additional Renewable Energy Credits, Zero Emissions Credits, or other federal, state, or locally mandated credits, taxes, or subsidies to support the development and/or maintenance of renewable or zero carbon resources, such costs will be automatically passed through to the Customer and incorporated into the rate. Customer understands and acknowledges that such costs are subject to change at any time and are outside of Symmetry's control.

22. Emergency Service. The NGDC will continue to respond to leaks and emergencies. In the event of a gas leak, service interruption or other emergency, Customer should immediately call the NGDC.

23. Parties Bound. This Agreement is binding upon the parties hereto and their respective successors and legal assigns.

In Witness Whereof, the Parties hereto, intending to be legally bound hereby have caused this Agreement to be executed pursuant to due and legal action authorizing the same to be done on the Effective Date set forth on the disclosure statement.

**EXHIBIT 8**  
**Proofs of Publication**

# LOCALiQ

Erie Times-News | The Intelligencer  
Bucks County Courier Times  
The Daily American | Beaver County Times  
Pocono Record | Burlington County Times

PO Box 630531 Cincinnati, OH 45263-0531

## **PROOF OF PUBLICATION**

Teresa Schultz  
Stevens & Lee  
17 N Second St 16th Floor  
Harrisburg PA 17101

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:

02/10/2023

Sworn to and subscribed before on 02/10/2023

## PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

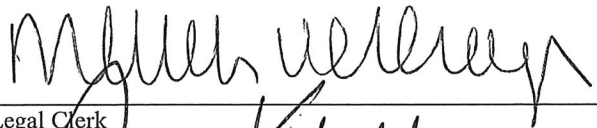
Application of Symmetry Energy Solutions, LLC For Approval To Offer, Render, or Furnish Services as a Supplier Engaged In The Business Of Supplying Natural Gas Supply Services To The Public In The Commonwealth Of Pennsylvania.

Symmetry Energy Solutions, LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a supplier of natural gas engaged in the business of providing natural gas services. Symmetry Energy Solutions, LLC proposes to sell natural gas and related services in the service territories of Columbia Gas of PA, Inc., PECO, National Fuel Gas Distribution Corp., Peoples Natural Gas Company - Peoples Natural Gas Division, Peoples Natural Gas Company - Peoples Gas Division, Philadelphia Gas Works, Valley Energy, Inc, and UGI Utilities.- Gas Division under the provisions of the new Natural Gas Choice and Competition Act.

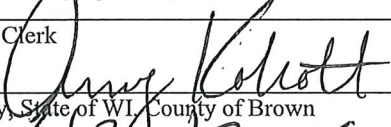
The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Symmetry Energy Solutions, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Symmetry Energy Solutions, LLC's attorney at the address listed below.

By and through Counsel for  
Symmetry Energy Solutions, LLC  
Michael Gruin, Esq.  
Stevens & Lee  
17 N. 2nd St., 16th Fl.  
Harrisburg, PA 17101  
Phone (717) 255-7365  
Fax (610) 988-0852

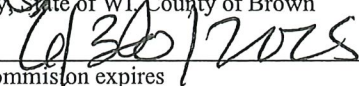
(2-8438516-NT-10)



Legal Clerk



Notary, State of WI, County of Brown



My commission expires

Publication Cost: \$290.42

Order No: 8438516

# of Copies:

Customer No: 582136

1

PO #:

**THIS IS NOT AN INVOICE!**

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

AMY KOKOTT  
Notary Public  
State of Wisconsin

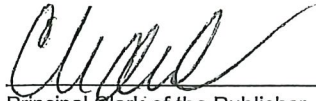


AD#: 0010576882

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 02/09/2023

  
Principal Clerk of the Publisher

Sworn to and subscribed before me this 9th day of February 2023

  
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

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

By and through Counsel for  
Symmetry Energy Solutions, LLC  
Michael Gruin, Esq.  
Stevens & Lee  
17 N. 2nd St., 16th Fl.  
Harrisburg, PA 17101  
Phone (717) 255-7365  
Fax (610) 988-0852

# The Philadelphia Inquirer

100 S. INDEPENDENCE MALL W, STE 600, PHILADELPHIA, PA 19106

## Affidavit of Publication

On Behalf of:  
STEVENS & LEE  
17 North 2nd St., 16th Floor  
Harrisburg, PA 17101

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 Daily News, with its headquarters at 100 S. Independence Mall West, Suite 600, Philadelphia, PA 19106.
2. The Philadelphia Daily News is an edition of The Philadelphia Inquirer. The Philadelphia Daily News is continuously published and distributed Sunday-Friday 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 Daily News on

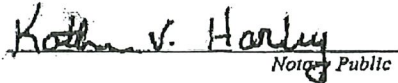
### Legal Notices

as published in Daily News Legals in the issue(s) of:

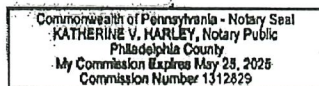
2/9/2023

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



  
Notary Public

My Commission Expires:



Ad No: 127622  
Customer No: 104075

## COPY OF ADVERTISEMENT

### PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

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By and through Counsel for Symmetry Energy Solutions, LLC  
Michael Gruln, Esq.  
Stevens & Lee  
17 N. 2nd St., 18th Fl.  
Harrisburg, PA 17101  
Phone (717) 255-7365  
Fax (610) 988-0852



### 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 D. Rullo, 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:

**02 of February, 2023**

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:  
February 2, 2023



#### COPY OF NOTICE OR PUBLICATION

##### PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

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By and through Counsel for Symmetry Energy Solutions, LLC

Michael Gruin, Esq.  
Stevens & Lee  
17 N. 2nd St., 16th Fl.  
Harrisburg, PA 17101  
Phone (717) 255-7365  
Fax (610) 988-0852

#### STATEMENT OF ADVERTISING COSTS

Stevens & Lee PC  
17 N. 2nd St., Floor 16  
ATTN: Teresa A. Shultz  
Harrisburg, PA 17101-1638

To PG Publishing Company

Total ----- \$443.30

#### 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 \_\_\_\_\_

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.

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

STEVENS & LEE  
MICHAEL A GRUIN  
16TH FLOOR 17 NORTH 2ND STREET  
HARRISBURG PA 17101

Account # 625240  
Order # 82695248  
Ad Price: 282.46

SYMMETRY ENERGY SOLUTIONS


Betzaida Cajigas

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:

02/08/2023

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 B. Cajigas

Sworn and subscribed to before me  
this 8th day of February A.D., 2023

  
(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**  
Application of **Symmetry Energy Solutions, LLC** For Approval To Offer, Render, or Furnish Services as a **Supplier Engaged In The Business Of Supplying Natural Gas Supply Services To The Public In The Commonwealth Of Pennsylvania.**

**Symmetry Energy Solutions, LLC** will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a supplier of natural gas engaged in the business of providing natural gas services. **Symmetry Energy Solutions, LLC** proposes to sell natural gas and related services in the service territories of Columbia Gas of PA, Inc., PECO, National Fuel Gas Distribution Corp., Peoples Natural Gas Company, Peoples Natural Gas Division, Peoples Natural Gas Company - Peoples Gas Division, Philadelphia Gas Works, Valley Energy, Inc, and UGI Utilities.- Gas Division under the provisions of the new Natural Gas Choice and Competition Act.

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

**By and through Counsel for Symmetry Energy Solutions, LLC**  
Michael Gruin, Esq.  
Stevens & Lee  
17 N. 2nd St., 16th Fl.  
Harrisburg, PA 17101  
Phone (717) 255-7365  
Fax (610) 988-0852



# Column

## OFFICIAL AD PROOF

This is the proof of your ad scheduled to run in **Williamsport Sun-Gazette** on the dates indicated below. If changes are needed, please contact us prior to deadline at **(570) 326-1551**.

Notice ID: S0iVpDhtz93rJYfgGMHX | **Proof Updated: Feb. 07, 2023 at 02:23pm EST**  
Notice Name: PUC-Symmetry Energy Solutions | Publisher ID: L1Z001

See Proof on Next Page

This is not an invoice. Below is an estimated price, and it is subject to change. You will receive an invoice with the final price upon invoice creation by the publisher.

<b>FILER</b>	<b>FILING FOR</b>
Teresa Shultz	Williamsport Sun-Gazette
teresa.shultz@stevenslee.com	
(717) 255-7374	

<b>Columns Wide: 1</b>	<b>Ad Class: Legals</b>
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02/10/2023: Custom Notice	286.00
Proof of Publication	5.00

Subtotal	\$291.00
Tax	\$0.00
Processing Fee	\$29.10
<b>Total</b>	<b>\$320.10</b>

PENNSYLVANIA  
PUBLIC UTILITY  
COMMISSION  
NOTICE

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By and through Counsel  
for **Symmetry Energy Solutions, LLC**:  
Michael Grün, Esq.  
Stevens & Lee  
17 N. 2nd St., 16th Fl.  
Harrisburg, PA 17101  
Phone (717) 255-7365  
Fax (610) 988-0852

COMMONWEALTH OF PENNSYLVANIA }  
 County of Cambria } SS

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 PUBLIC UTILITY COMMISSION  
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**By and through Counsel for  
 Symmetry Energy Solutions, LLC  
 Michael Gruln, Esq.  
 Stevens & Lee  
 17 N. 2nd St., 16th Fl.  
 Harrisburg, PA 17101  
 Phone (717) 255-7365  
 Fax (610) 988-0852**

published  
 that the a  
 of The Joh  
 interested  
 character

On this 8th day of February A.D. 2023, 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, of Cambria, and Commonwealth of Pennsylvania and matter published in said publication in the regular issues on February 8, 2023; and that the Affiant is not tising and that all of the allegations as to time, place and

Christine Marhefka

**STATEMENT OF ADVERTISING COSTS**

Signed and sworn to before me on 8th day of February, 2023, by Christine Marhefka making the statement.

Juan Ohs

0.00 Lines @	\$2.70 per line	0.00
7 Inches @	\$27.00 per inch	189.00
Notary Fee		5.00
Clerical Fee		2.50
<b>Total Cost</b>		<b>196.50</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 Juan Ohs

## CERTIFICATE OF SERVICE

On this the 6th day of March 2023, I certify that a true and correct copy of the foregoing filing has been served upon the following by First Class U.S. Mail, postage prepaid:

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 Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101	Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance PO Box 281230 Harrisburg, PA 17128-0946
Pennsylvania Public Utility Commission Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120	<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>
<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>	<b>National Fuel Gas Distribution Corp.</b> Daniel Czechowicz 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>
<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>	<b>PECO</b> Suzette Adams, 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>
<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>	<b>Philadelphia Gas Works</b> Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: <a href="mailto:pgwchoicesupply@pgworks.com">pgwchoicesupply@pgworks.com</a>



DATE: March 6, 2023

\_\_\_\_\_  
Michael A. Gruin, Esq.