

Stevens & Lee

17 N. Second Street, 16th Floor
Harrisburg, PA 17101
www.stevenslee.com

Direct Dial: (717) 255-7365
Email: michael.gruin@stevenslee.com
Direct Fax: (610) 988-0852

April 4, 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
Docket No. A-2023-3038750**

Dear Secretary Chiavetta:

Enclosed for filing please find the Responses of Symmetry Energy Solutions, LLC to the TUS Data Requests issued in this matter, along with a signed verification.

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

Sincerely,
STEVENS & LEE



Michael A. Gruin, Esq.

Enclosures

cc: Jeremy Haring, TUS (jharing@pa.gov)

Docket No. A-2023-3038750
Symmetry Energy Solutions, LLC
Data Request

1. Reference Application, Section 4.d, Bonding Letters – Applicant failed to provide any of the required bonding letters. Please provide the missing documentation.

RESPONSE: See attached bonding letters.

VERIFICATION

I, Stephen Farina holding the position of Vice President of Mass Markets with Symmetry Energy Solutions, LLC verify that the information provided in the foregoing responses to data requests is true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsifications to authorities.

A handwritten signature in black ink, appearing to read "Stephen Farina", is written over a horizontal line.

Date: 4/3/23



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

March 7, 2023

Michael Gruin
Stevens & Lee
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101
Email: Michael.Gruin@stevenslee.com

Dear Mr. Gruin:

Re: Security Requirement for Symmetry Energy Solutions, LLC

Philadelphia Gas Works (“PGW”) is aware that Symmetry Energy Solutions, LLC has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the service territory of Philadelphia Gas Works. You have stated that, in performing these services, Symmetry Energy Solutions, LLC will take title to any delivered natural gas.

Under its tariff, Philadelphia Gas Works could require Symmetry Energy Solutions, LLC to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate. Upon final approval of your application to PGW and prior to enrolling customers, security in the first year for firm pools will be required based on your estimated firm pool size. It will be updated annually based on actual firm pool size.

At this time, Symmetry Energy Solutions, LLC does not need to post a bond or other form of security.

If you have any questions concerning the foregoing, please contact me at 215-684-6725.

Sincerely,


John C Zuk (Mar 8, 2023 12:46 EST)

John C. Zuk
Sr. Vice President, Gas Management

/dls



March 30, 2023

Stacy Williams
General Counsel
Symmetry Energy Solutions, LLC
9811 Katy Freeway, Suite 1400
Houston, TX 77024

Dear Stacy Williams:

We are pleased that Symmetry Energy Solutions, LLC has applied for a license to provide Natural Gas Supply Service on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Columbia Gas has performed a creditworthiness evaluation for Symmetry Energy Solutions, LLC.

Under Paragraph 2.4.1 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas will require the Natural Gas Supplier to provide financial information in order for the Company to establish the Natural Gas Supplier's creditworthiness.

We have determined that Symmetry Energy Solutions, LLC currently meets Columbia Gas' creditworthiness requirement.

Upon receipt of the required security requirement and the execution of the required agreements Symmetry Energy Solutions, LLC will satisfy the financial security requirement to provide Natural Gas Supply Service to Columbia Gas customers.

Please feel free to contact me at 614-460-4217 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

Kylia Davis

Kylia Davis
Manager of Choice and Transportation Support Services



National Fuel

April 3, 2023

Symmetry Energy Solutions, LLC
c/o Michael Gruin
Stevens & Lee
17 N. 2nd Street, 16th Fl.
Harrisburg, PA 17101

Dear Michael,

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

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

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

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

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

Yours truly,

Nicole Barker
Transportation Services Department



pecoSM

AN EXELON COMPANY

March 29, 2023

Symmetry Energy Solutions, LLC
c/o Michael Gruin
Stevens & Lee
17 N. 2nd Street, 16th Fl.
Harrisburg, PA 17101

Re: Bonding Requirements

Dear Symmetry Energy Solutions, LLC:

PECO is aware that Symmetry Energy Solutions, LLC has applied for a license to provide brokering and consulting services to commercial and industrial customers on the distribution system of PECO.

In making such an application Symmetry Energy Solutions, LLC could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Symmetry Energy Solutions, LLC has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers will not take title to any delivered natural gas; nor will accept any customer payments or deposits.

Therefore, PECO has determined at this time that Symmetry Energy Solutions, LLC does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by Symmetry Energy Solutions, LLC or the creditworthiness requirement for PECO's exposure to Symmetry Energy Solutions, LLC changes in the future, PECO reserves the right to require Symmetry Energy Solutions, LLC to provide a bond or other financial security instrument.

If you should have any questions regarding this matter, please contact Wanda Rucker at wanda.rucker@exeloncorp.com.

Respectfully submitted,


Suzette Adams
Manager, Gas Supply and Transportation
2301 Market
Philadelphia, PA 19103



375 North Shore Drive
Pittsburgh, Pennsylvania 15212

www.peoples-gas.com

Carol Scanlon
Manager, Rates

Peoples Natural Gas Company LLC
Phone: 412-208-6931
Email: Carol.Scanlon@peoples-gas.com

March 16, 2023

Stacy Williams
SVP and General Counsel
Symmetry Energy Solutions, LLC
9811 Katy Freeway, Suite 1400
Houston, TX 77024

Dear Mr. Williams:

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

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

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

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

Sincerely,

Carol Scanlon
Manager, Rates
Peoples Natural Gas Company LLC

Cc: Stephen Kelly
Mina Speicher



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

610-796-3400

VIA E-MAIL

March 24, 2023

Symmetry Energy Solutions, LLC
c/o Michael Gruin, counsel for Symmetry Energy Solutions
Michael A. Gruin
Stevens & Lee
17 N. 2nd Street, 16th Fl.
Harrisburg, PA 17101

RE: UGI Financial Security Requirements

Dear Mr. Gruin,

UGI Utilities, Inc.–Gas Division (hereinafter “UGIU”) has reviewed the application of Symmetry Energy Solutions, LLC (hereinafter “Symmetry Energy”) for approval to operate as a Natural Gas Supplier. Based on this review and the requirement that Symmetry Energy must post security as specified in the UGIU Supplier Coordination Tariff before it serves customers on the UGIU distribution systems, UGIU has determined that Symmetry Energy has demonstrated adequate creditworthiness to satisfy any costs UGIU may incur in the event they operate as a supplier of last resort due to a default on the part of Symmetry Energy. Such security forms and amounts can be found in Section 8 of UGIU’s Gas Choice Tariff No. 7S at <https://ugi.outsystemsenterprise.com/UGITariff FO/Tariffs>.

This determination may change in the event there is a material deterioration in Symmetry Energy’s financial condition, if Symmetry Energy’s obligations to UGIU exceed the amount of the financial security provided, if the financial security is withdrawn or is deemed to be null and void or inadequate due to the material financial deterioration of any guarantor, or if Symmetry Energy fails to abide by the terms and conditions of the UGIU Gas Tariff and the UGIU Natural Gas Supplier Coordination Tariff.

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

Sincerely,

Sherry Epler
Senior Manager
Tariff & Supplier Administration

SE/rks



VALLEY ENERGY

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

March 6, 2023

VIA EMAIL

Michael A. Gruin
Stevens & Lee
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101
michael.gruin@stevenslee.com

RE: Symmetry Energy Solutions, LLC

Dear Mr. Gruin:

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

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

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

Sincerely,

Edward E. Rogers
President & CEO

EER/km

cc: J. Beale, Valley Energy