

Docket No. A-2023-3044051

Priority Power Management LLC dba PPM Atlas

Data Request Responses

1. Reference Application, Section 1.a,

Please find the web address for Priority Power Management, LLC (“PPM”) here:

- [www.prioritypower.com](http://www.prioritypower.com)

Satori Energy and Energy Solutions USA were acquisitions made by PPM and are disregarded entities for tax filing purposes. Both brands roll-up into PPM, but are not dbas so we were including this information for reference.

2. Reference Application, Section 3.a and 3.b, Affiliates and Predecessors.

PPM is currently licensed as an electric generation supplier (EGS) at Docket No. A-2011-2245433. Please find updated pages 7 & 8 attached.

3. Reference Application, Section 7.a, Financial Fitness.

PPM has received a letter back from all utilities the State has requested that we reach out to. Presumably due to the fact that PPM does not take title to the commodity, no utilities have requested that PPM provide a bonding letter or other form of financial security. The letters are attached from each utility.

4. Reference Application, Section 7.b, Financial Fitness

CY2022 audited financial statements. Please note that these are confidential and should not be made publicly available to anyone outside the Commission. These documents were overnighted to Pennsylvania Public Utility Commission to arrive Friday, Dec. 1st by 3:00PM

- 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. **SEE ATTACHMENT**
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. **SEE ATTACHMENT**

Give name and address of officers.

**Katherine Graham - 4526 Research Forest Drive, Suite 250  
The Woodlands, TX 77381**

**Brandon Schwertner - 4526 Research Forest Drive, Suite 250  
The Woodlands, TX 77381**

**Joe Loner – 2201 E. Lamar Blvd, Suite 275, Arlington, TX 76006**

**John Bick – 2201 E. Lamar Blvd, Suite 275, Arlington, TX 76006**

### **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.

Priority Power is currently doing business in PA as an electric generation supplier (EGS) under Docket No A-2011-2245433

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.

Priority Power is currently doing busienns in PA as an electric generation supplier (EGS) under Docket No. A-2011-2245433

**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 an 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.



October 30, 2023

Kristen Spevak  
Priority Power Management LLC  
2201 E. Lamar Blvd, Ste 275  
Arlington, TX 76006

Dear Kristen Spevak:

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

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

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

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

Sincerely,

*Kylia Davis*

Kylia Davis  
Manager of Choice and Transportation Support Services



**National Fuel**

November 21, 2023

Priority Power Management LLC  
Attn: Kristen Spevak  
2201 E. Lamar Blvd, Ste 275  
Arlington, TX 76006

Dear Kristen,

National Fuel Gas Distribution Corporation (“NFGDC”) is aware Priority Power Management LLC (PPM) 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, PPM must furnish acceptable security to each utility where PPM will do business. As such, under its tariff, NFGDC could require PPM 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 PPM intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, PPM 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, PPM does not need to post a bond or other form of security to operate in its service territory. However, if the services provided by PPM change in the future, NFGDC reserves the right to require security from PPM 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



375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

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

**Carol Scanlon**  
Manager, Rates

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

November 22, 2023

David C. Wiers  
Senior Managing Director  
Priority Power Management, LLC  
2201 E. Lamar Blvd, Suite 275  
Arlington, TX 76006

Dear Mr. Wiers:

We are pleased that Priority Power Management, 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 Priority Power Management, LLC is not currently serving customers on the Peoples systems, we have determined at this time that Priority Power Management, 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 Priority Power Management 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](mailto:Carol.Scanlon@peoples-gas.com).

Sincerely,

Carol Scanlon  
Manager, Rates  
Peoples Natural Gas Company LLC

Cc: Stephen Kelly  
Mina Speicher



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

610-796-3400

**VIA E-MAIL**

November 21, 2023

Priority Power Management, LLC  
2201 E. Lamar Boulevard  
Suite 275  
Arlington, TX 76006

**ATTENTION:**        **Kristen Spevak**  
                                 [Regulatory1@prioritypower.com](mailto:Regulatory1@prioritypower.com)

**RE:    Application to Serve as a Natural Gas Broker**

Dear Ms. Spevak,

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

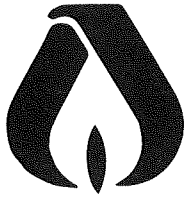
Please feel free to contact me with any additional questions you may have.

Sincerely,

A handwritten signature in blue ink that reads 'Sherry Epler'.

Sherry Epler  
Senior Manager  
Tariff & Supplier Administration

SE/rks



# VALLEY ENERGY

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

November 21, 2023

**VIA EMAIL**

Priority Power Management  
Kristen Spevak  
2201 E. Lamar Blvd, Ste 275  
Arlington, TX 76006  
Regulatory1@priorityopower.com

**RE: Priority Power Management LLC**

Dear Ms. Spevak:

We understand that Priority Power Management 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 Priority Power Management LLC intends to only provide natural gas aggregating, brokering, and consulting services at this time, we have determined that Priority Power Management 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 Priority Power Management 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





**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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11/21/2023

Kristen Spevak  
Priority Power Management LLC  
2201 E Lamar Blvd, Ste 275  
Arlington, TX 76006

[Regulatory1@prioritypower.com](mailto:Regulatory1@prioritypower.com)

RE: Security Requirement Bond for Priority Power Management LLC.

Dear Kristen Spevak,

Philadelphia Gas Works (“PGW”) is aware that Priority Power Management 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 services territory of Philadelphia Gas Works.

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

However, you have indicated, and it is Philadelphia Gas Works’ understanding, that Priority Power Management LLC intends only to provide natural gas aggregating, brokering, and consulting services at this time. You have stated that in performing these services Priority Power Management LLC will never take title to any delivered natural gas.

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Priority Power Management LLC does not need to post a bond or other form of security to operate in its service territory. If the services provided by Priority Power Management LLC should change, Philadelphia Gas Works reserves the right to require security from Priority Power Management LLC as it deems appropriate.

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

Sincerely,

  
John C. Zuk (Nov 21, 2023 14:08 EST)

JOHN C. ZUK  
Sr. Vice President, Gas Management

/dls



peco<sup>SM</sup>

AN EXELON COMPANY

November 29, 2023

Priority Power Management, LLC  
2201 E Lamar Blvd. Ste 275  
Arlington, TX 76006

Re: Bonding Requirements

Dear Priority Power Management, LLC:

PECO is aware that Priority Power Management, 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 Priority Power Management, LLC could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Priority Power Management, 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 Priority Power Management, 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 Priority Power Management, LLC or the creditworthiness requirement for PECO's exposure to Priority Power Management, LLC changes in the future, PECO reserves the right to require Priority Power Management, LLC to provide a bond or other financial security instrument.

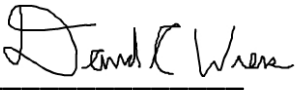
If you should have any questions regarding this matter, please contact Wanda Rucker at [Wanda.Rucker@exeloncorp.com](mailto:Wanda.Rucker@exeloncorp.com).

Respectfully submitted,

*Suzette Adams*

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

I, David C. Wiers hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature 

Title Senior Managing Director

Date 11/30/2023