

# Cover Page

Docket # A-2024-3049891

## Gas Generation Application

Enclosed please find corrections/completions in reference to the letter received to correct 1.c, 1. e, 5. a, 5. b, 7. a and 11.a, 11.b

1.c- title was added

1.e -titles were added and email was added

5.a- it has been corrected to none

5.b- it has been corrected to none

7.a-Bond Letter Requirements enclosed

11.a- correct affidavits from gas supplier application enclosed

11.b- correct affidavits from gas supplier application enclosed

Integrity NRG Services of Pennsylvania LLC

Steven Stern 7/31/24

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Integrity NRG Services of Pennsylvania LLC N/A

Application of \_\_\_\_\_, d/b/a \_\_\_\_\_, for approval to offer, render, furnish, or supply natural gas supply services as a(n) as specified in item #4b below to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

## 1. IDENTIFICATION AND CONTACT INFORMATION

a. **IDENTITY OF THE APPLICANT:** Provide name (including any d/b/a fictitious name), primary address, web address, and telephone number of Applicant: Integrity NRG Services of Pennsylvania LLC

125 Glen Ave Suite B Lakewood NJ 08701  
Integritynrg.com  
800-604-0268

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.

Name-Harbor Compliance Corporation  
Address- 1830 Colonial Village Lane Lancaster PA 17601  
Phone-1888-995-5895 email-info@harborcompliance.com

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.

Title- Director Steven Stern  
sstern@integritynrg.com  
125 Glen ave Lakewood NJ 08701  
Tel 845 558 9720  
Fax 888 632 6164

d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

N/A Applicant will not be using an attorney

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. Joe Gestetner manager 125 Glen Ave Lakewood NJ 08701 7324791746 Steven Stern 125 Glen Ave Lakewood NJ 08701 732 4791722

Joe Gestetner - Title- CEO  
jgestetner@integritynrg.com

Steven Stern - Title- Director  
sstern@integritynrg.com

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.

~~N/A~~ None

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

~~N/A~~ 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.

N/A None

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

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)*

*see attached*

- a.) **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

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

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

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

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

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

## 7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa.C.S. § 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.

See letters attached

- 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 statements (3-12 recent consecutive months), tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

See attached

- 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.

N/A The applicant will be a broker/marketer only

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

Commission

# OPERATIONS AFFIDAVIT

[Commonwealth/State] of New jersey :

County of Ocean :  
Steven Stern :

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

[He/she is the Manager Integrity NRG Services of Pennsylvania LLC  
(Name of Applicant);] (Office of Affiant) of \_\_\_\_\_

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

Integrity NRG Services of Pennsylvania LLC

That \_\_\_\_\_, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

Integrity NRG Services of Pennsylvania LLC

That \_\_\_\_\_, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

Integrity NRG Services of Pennsylvania LLC

That \_\_\_\_\_, the Applicant herein, acknowledges that failure to comply with any provision of Chapter 22 of the Public Utility Code or the rules, regulations, orders or directives of the Department of Revenue or of the Commission, including, but not limited to, engaging in anticompetitive behavior, shall be cause for the Commission to revoke the Applicant's license. See 66 Pa.C.S. § 2208(c)(2). 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)**

Integrity NRG Services of Pennsylvania LLC

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

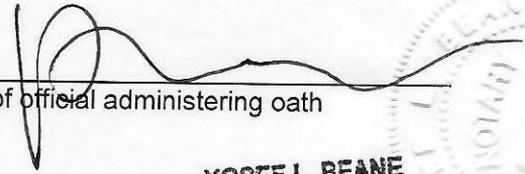
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



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

Sworn and subscribed before me this 30 day of July, 2024.



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

My commission expires 12/23/2025.

**YOSEF L. BEANE**  
**I.D. # 2392279**  
**NOTARY PUBLIC OF NEW JERSEY**  
**My Commission Expires 12/23/2025**



# APPLICATION AFFIDAVIT

[Commonwealth/State] of New Jersey :

County of Ocen : ss.

Steven Stern, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:  
Integrity NRG Services of Pennsylvania LLC  
[He/she is the Manager (Office of Affiant) of \_\_\_\_\_ (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]  
Integrity NRG Services of Pennsylvania LLC

That the Applicant herein \_\_\_\_\_ 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) and 52 Pa. Code § 62.109(a).

Integrity NRG Services of Pennsylvania LLC  
That the Applicant herein \_\_\_\_\_ has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

Integrity NRG Services of Pennsylvania LLC  
That the Applicant herein \_\_\_\_\_ acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

Integrity NRG Services of Pennsylvania LLC  
That the Applicant herein \_\_\_\_\_ acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

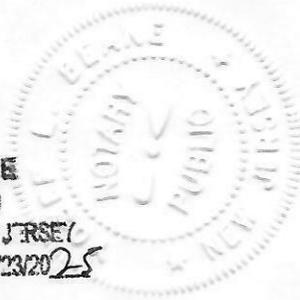
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Signature]  
Signature of Affiant

Sworn and subscribed before me this 30 day of July, 2024.

[Signature]  
Signature of official administering oath

**JOSEPH L. BEANE**  
I.D. # 2392279  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires 12/23/2025



My commission expires 12/23/2025

**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)

July 31, 2024

Mr. Steven Stern  
Director  
Integrity NRG Services of  
Pennsylvania LLC  
125 Glen Ave  
Lakewood, NJ 08701

Dear Mr. Stern:

We are pleased that Integrity NRG Services of Pennsylvania 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 Integrity NRG Services of Pennsylvania LLC is not currently serving customers on the Peoples systems, we have determined at this time that Integrity NRG Services of Pennsylvania 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 Integrity NRG Services of Pennsylvania 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**

July 30, 2024

Integrity NRG Services of Pennsylvania, LLC  
125 Glen Avenue  
Lakewood, NJ 08701

**ATTENTION:**            **Steven Stern, Director**  
   [sstern@integritynrg.com](mailto:sstern@integritynrg.com)

**RE: Integrity NRG Services of Pennsylvania, LLC**  
**Application to Serve as a Natural Gas Broker**

Dear Mr. Stern,

Based on your assertion that Integrity NRG Services of Pennsylvania, LLC (“Integrity NRG”) is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc.-Gas Division (“UGIU”) has concluded that Integrity NRG will not need to post security with UGIU. This is based on the declaration that Integrity NRG 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 Integrity NRG wishes to directly serve Choice customers in the service territories of UGIU in the future as a natural gas supplier, it will have to post security as specified in the UGIU Tariff prior to the commencement of the service.

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

Sincerely,

Sherry Epler  
Senior Manager  
Tariff & Supplier Administration

SE/rks



# VALLEY ENERGY

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

July 30, 2024

**VIA EMAIL**

Integrity NRG Services of Pennsylvania, LLC  
125 Glen Ave  
Lakewood, NJ 08701  
[sstern@integritynrg.com](mailto:sstern@integritynrg.com)

**RE: Integrity NRG Services of Pennsylvania, LLC**

Dear Mr. Stern:

We understand that Integrity NRG Services of Pennsylvania, 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.

Pursuant to 66 Pa.C.S. § 2208(c), an applicant for a natural gas supplier license must furnish security to each utility where it will do business to ensure the supplier's financial responsibility. To this end, Valley Energy periodically will perform a credit review and analysis of Integrity NRG Services of Pennsylvania, LLC when it begins to serve customers on Valley Energy's system. Valley Energy will determine whether Integrity NRG Services of Pennsylvania, LLC must post a security based on the credit review, the types of customers served, the volumes expected to be delivered for those customers and the other rules in Valley Energy's Supplier Tariff. At this time, no security is being requested; however, if the services provided change in the future, we reserve the right to require security from Integrity NRG Services of Pennsylvania, 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

August 1, 2024

Steven Stern  
Integrity NRG Services Of Pennsylvania LLC  
125 Glen Ave  
Lakewood NJ 08701

Dear Steven Stern:

We are pleased that Integrity NRG Services Of Pennsylvania 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, Integrity NRG Services Of Pennsylvania 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. Integrity NRG Services Of Pennsylvania LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Integrity NRG Services Of Pennsylvania 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 Integrity NRG Services Of Pennsylvania LLC changes in the future, Columbia Gas might deem it appropriate to require Integrity NRG Services Of Pennsylvania 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®

August 1, 2024

Steven Stern, Director  
Integrity NRG Services of Pennsylvania LLC  
125 Glen Ave Lakewood NJ 08701

Dear Steven,

National Fuel Gas Distribution Corporation (“NFGDC”) is aware Integrity NRG Services of Pennsylvania LLC (INS) 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, INS must furnish acceptable security to each utility where INS will do business. As such, under its tariff, NFGDC could require INS to provide a bond or other financial security instrument in an amount that NFGDC determines to be appropriate.

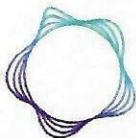
However, you have indicated, and it is NFGDC’s understanding that INS intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, INS will never take title to any delivered natural gas, nor will it accept any customer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

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

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

Yours truly,

Jason Allen  
Transportation Services Department



peco<sup>SM</sup>

AN EXELON COMPANY

August 2, 2024

Steven Stern, Director  
Integrity NRG Services of Pennsylvania LLC.  
125 Glen Ave  
Lakewood NJ 08701

Re: Bonding Requirements

Dear Steven Stern:

PECO is aware that Integrity NRG Services of Pennsylvania 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 Integrity NRG Services of Pennsylvania LLC could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Integrity NRG Services of Pennsylvania LLC has indicated that it intends to provide only brokering and/or 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 Integrity NRG Services of Pennsylvania 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 Integrity NRG Services of Pennsylvania LLC or the creditworthiness requirement for PECO's exposure to Integrity NRG Services of Pennsylvania LLC changes in the future, PECO reserves the right to require Integrity NRG Services of Pennsylvania 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



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

8/5/2024

Mr. Steven Stern  
Integrity NRG Services of Pennsylvania LLC  
125 Glen Ave, Lakewood NJ 08701

[sstern@integritynrg.com](mailto:sstern@integritynrg.com)

RE: Security Requirement Bond for Integrity NRG Services of Pennsylvania LLC

Dear Mr. Stern,

Philadelphia Gas Works ("PGW") is aware that Integrity NRG Services of Pennsylvania 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, Integrity NRG Services of Pennsylvania LLC must furnish acceptable security to each utility where Integrity NRG Services of Pennsylvania LLC will do business. As such, under its tariff, Philadelphia Gas Works could require Integrity NRG Services of Pennsylvania 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 Integrity NRG Services of Pennsylvania LLC intends only to provide natural gas aggregating, brokering, and consulting services at this time. You have stated that in performing these services Integrity NRG Services of Pennsylvania LLC will never take title to any delivered natural gas.

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

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

Sincerely,

A handwritten signature in black ink that reads "John C. Zuk".

JOHN C. ZUK, 2024-09-04 10:11  
JOHN C. ZUK

Sr. Vice President, Gas Management

/dls