



Castleton Commodities Merchant Trading L.P.
c/o Castleton Commodities International LLC
2200 Atlantic Street, Suite 800
Stamford, CT 06902-6834

Tel (203) 564-8100
Fax (203) 564-8119

November 26, 2024

Pennsylvania Public Utility Commission
Secretary's Bureau
400 North Street, Keystone Building
Harrisburg, PA 17120

**Re: *Castleton Commodities Merchant Trading L.P.*
Natural Gas Supplier License Application**

Dear Secretary:

Enclosed please find Castleton Commodities Merchant Trading L.P.'s ("CCMT") Public Version of its original application for consideration as a Natural Gas Supplier in the Commonwealth of Pennsylvania. CCMT's financial information under Sections 7.b and 7.f is considered confidential and proprietary and therefore is being filed under seal.

Should you have any questions or concerns regarding the application, please do not hesitate to contact me. Thank you for your time.

Sincerely,

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

Robert Ruckman
Authorized Signatory for Castleton Commodities
Trading GP, the general partner of Castleton
Commodities Merchant Trading L.P.
2200 Atlantic Street, Suite 800
Stamford, CT 06902-6834

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Castleton Commodities Merchant Trading L.P. for approval to offer, render, furnish, or supply natural gas supply services as a Supplier or Aggregator 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 d/b/a fictitious name*), primary address, web address, and telephone number of Applicant:

*Castleton Commodities Merchant Trading L.P.
2200 Atlantic Street, Suite 800
Stamford, CT 06902-6834
www.cci.com
203-564-8100*

- 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.

*Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808*

- 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.

Name: *Marissa Miraval*
Title: *Head of US Compliance*
Address: *2200 Atlantic Street, Suite 800, Stamford, CT 06902*
Telephone number: *203-564-8100*
Fax number: *203-564-8119*
Email: compliance@cci.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.

Not 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.

Name: Bryan Dooley
Title: Physical Natural Gas Trader
Address: 2200 Atlantic Street, Suite 800, Stamford, CT 06902
Telephone number: 203-564-8100
Fax number: 203-564-8119
Email: bryan.dooley@cci.com

Name: Juan Souchon
Title: Co-Manager – Natural Gas Scheduling NE
Address: 2200 Atlantic Street, Suite 800, Stamford, CT 06902
Telephone number: 203-564-8100
Fax number: 203-564-8119
Email: juan.souchon@cci.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, Form DSCB: 54-311.

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. § 412 relating to Department of State filing requirements.

or

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa.C.S. § 8621)
- foreign general or limited partnership (15 Pa.C.S. §§ 411 and 412)
- domestic limited liability partnership (15 Pa.C.S. §§ 8201 and 8221)
- foreign limited liability general partnership (15 Pa.C.S. §§ 411 and 412)
- foreign limited liability limited partnership (15 Pa.C.S. §§ 411 and 412)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.

See Exhibit 2.b.

- 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.

Castleton LP Holdings LLC is a 100% Limited Partner of CCMT, and Castleton Commodities Trading GP LLC is a 100% General Partner of CCMT. Both Castleton LP Holdings LLC and Castleton Commodities Trading GP LLC are 100% owned by Castleton Global Trading LLC, which is 100% owned by Castleton Commodities International LLC (“CCI”). 2200 Atlantic Street, Stamford, CT 06092.

The officers of Castleton Commodities Trading GP LLC, as the General Partner of CCMT, are as follows:

*William C. Reed II - Chief Executive Officer
Nicholas P. Haslett - President
Arie Pilo - Executive Vice President
John V. Tesoriero - Executive Vice President
Richard Dolcetti - Chief Financial Officer
Sean Colvin - Senior Vice President and Treasurer
Annemarie Dunleavy - Secretary
Jay Reynolds - Vice President
Kathryn Thomas - Vice President*

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

Delaware. See Exhibit 2b.

- * 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. §§ 411 and 412.

OR

The Applicant is a:

- domestic corporation (15 Pa.C.S. § 1308)
- foreign corporation (15 Pa.C.S. §§ 411 and 412)
- domestic limited liability company (15 Pa.C.S. § 8821)
- foreign limited liability company (15 Pa.C.S. §§ 411 and 412)
- 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.

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

- a. **AFFILIATES:** Give name and address of any affiliates currently doing business and state whether the affiliates 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.

None of CCMT's affiliates are jurisdictional public utilities in Pennsylvania, nor are any of its affiliates currently applying to do business in Pennsylvania. None of CCMT's affiliates provide retail service or are licensed to provide retail services in any other state.

- b. **PREDECESSORS:** Identify any predecessors of the Applicant and provide the names under which the Applicant has operated, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

CCMT was first formed as Louis Dreyfus Plastics LLC and then converted to an LP with the name of Louis Dreyfus Energy Services L.P. That name was later changed to Castleton Commodities Merchant Trading L.P. The full names and addresses of the predecessor companies are below. See also Exhibit 2.b.

*Louis Dreyfus Plastics LLC
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801*

*Louis Dreyfus Energy Services L.P.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801*

- c. **RELATED DOCKET NUMBERS:** Provide the Docket Numbers for any previous Pennsylvania PUC licenses for the Applicant, all affiliates, and any predecessors. If the Applicant does not have any related Docket Numbers, explicitly state so.

No related docket numbers.

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.

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.

Castleton Commodities Merchant Trading L.P. ("CCMT") proposes to provide retail natural gas supply services to large commercial and industrial end-users in the Commonwealth of Pennsylvania.

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

Columbia

Philadelphia Gas Works

- | | |
|---|--|
| <input type="checkbox"/> National Fuel Gas | <input checked="" type="checkbox"/> UGI Utilities – Gas Division |
| <input type="checkbox"/> PECO | <input type="checkbox"/> Valley Energy |
| <input type="checkbox"/> Peoples Natural Gas Company - Peoples Natural Gas Division | |
| <input type="checkbox"/> Peoples Natural Gas Company - Peoples Gas Division | |
| <input type="checkbox"/> All of the above | |

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 Licensing Requirements Applicable to Mixed Meter Scenarios Secretarial Letters served March 25, 2011, and July 3, 2013, at Docket No. M-2009-2082042.

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

January 1, 2025, or as soon as CCMT is authorized to provide such services, whichever is earlier.

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.

No proceedings.

- b. **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.

No actions or complaints.

- c. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above. Additionally, provide details of any actions the applicant has undertaken that will prevent the items listed above from occurring if licensed in Pennsylvania.

N/A

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 Sections 1.57, 1.58, and 62.103(c) of the Commission’s Regulations, 52 Pa. Code §§ 1.57, 1.58, and 62.103(c), 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 Small Business Advocate
 Forum Place
 555 Walnut Street, 1st Floor
 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

See Certificate of Service in Exhibit 6.

- b.) **NGDCs:** Pursuant to Sections 1.57, 1.58, and 62.103(c) of the Commission’s Regulations, 52 Pa. Code §§ 1.57, 1.58, and 62.103(c), 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>Columbia Gas of PA, Inc. Transport Support Services 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.4980 e-mail: transportevaluations@nisource.com</p>	<p>National Fuel Gas Distribution Corp. Daniel Czechowicz, Director – Gas Supply Administration 6363 Main Street Williamsville, NY 14221 PH: 716.857.6917 e-mail: czechowiczd@natfuel.com</p>
<p>Peoples Natural Gas Company LLC – Peoples Natural Gas Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>Peoples Natural Gas Company LLC – Peoples Gas Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>

<p>PECO Suzette Adams, Sr. Manager, Gas Supply and Transportation 2301 Market Street, S-18 Philadelphia, PA 19103 PH: 215.841.6467 Email: Suzette.Adams@exeloncorp.com</p>	<p>Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com</p>
<p>UGI Utilities, Inc. – Gas Division Sherry Epler 1 UGI Drive Denver, PA 17517 PH: 610.796.3447 Email: sepler@ugi.com</p>	<p>Valley Energy Inc. Ed Rogers 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: erogers@ctenterprises.org</p>

See Certificate of Service in Exhibit 6.

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 Exhibit 7a.

- 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.

*See **CONFIDENTIAL** Exhibit 7.b.*

- 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.

*See **CONFIDENTIAL** Exhibit 7.b for the consolidated financial statements of Castleton Commodities International LLC ("CCI"), CCMT's parent company for the twelve months ending in March 31, 2024 and fifteen months ending in March 31, 2023. CCI also submits its 2023 Annual Report, as well as a notarized letter from CCI taking full financial responsibility for CCMT as it relates to this license.*

- 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.

*CCI maintains business insurance commensurate with its operations and requirements under applicable laws. The coverage includes Property, General Liability and Umbrella, Auto, Workers Comp, Crime, Cyber and D&O policies that range between \$1M - \$10M+ in limit for each policy, and includes coverage for CCMT. Proof of such insurance is provided at **CONFIDENTIAL** Exhibit 7.b.*

- 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 **CONFIDENTIAL** Exhibit 7.b for CCMT's financial statements (one statement covering the 12-month period ending in March 31, 2024, and the other covering the three-month period ending in June 30, 2024). CCMT also submits its Pennsylvania Sales, Use, and Hotel Occupancy Tax Returns. CCMT does not independently file state or federal income taxes.*

- 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 **CONFIDENTIAL** enclosed financial statements. CCMT has funded its operations from its inception through revenue derived from sales of its energy services.*

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

Applicant is not a broker or marketer.

- 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.

Not applicable.

- 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.

Item 7A on the Tax Certification Statement is designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

*See **CONFIDENTIAL** Exhibit 7.f.*

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.
See Exhibit 8.a.
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
See Exhibit 8.a.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
See Exhibit 8.a.
- Staffing structure and numbers as well as employee training commitments
See Exhibit 8.a.
- Business plans for operations within the Commonwealth.
See Exhibit 8.a.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

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):

Castleton does not anticipate engaging in marketing. To the extent it does, it will use its own internal resources/employees.

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.

- 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.

As noted elsewhere in this Application, CCMT does not anticipate engaging in marketing to other customers. CCMT is primarily active in the wholesale natural gas markets, and anticipates its retail supply services in Pennsylvania to be ancillary to its wholesale operations.

- 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.

CCMT has no elected officers and is operated by its general partner, Castleton Commodities Trading GP LLC. The following officers are responsible for organizational operations:

*Richard Dolcetti – Chief Financial Officer
Arie Pilo - Executive Vice President*

See Exhibit 8.e for their resumes.

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.

Castleton does not propose to serve Residential and/or Small Commercial Customers.

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 30th 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) and 52 Pa. Code § 62.112(a). 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. §§ 4902, 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.

See attached Exhibit 11.

- 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.

See attached Exhibit 11.

12. NEWSPAPER PUBLICATIONS

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

All Applicants MUST include a Commission issued Docket Number in their publications. Docket Numbers are issued to new applicants when an application packet is submitted to the PUC's Secretary's Bureau. **Newspaper publications published without a Commission issued Docket No. will be rejected.** For more information, see 52 Pa. Code § 62.107.

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 to the Commission before the applicant is licensed.**

	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)

Castleton will file publications containing docket numbers once a docket number is received in this proceeding.

13. SIGNATURE

Applicant: Castleton Commodities Merchant Trading L.P.

By: 

Authorized Signatory for Castleton Commodities Trading GP,
Title: the general partner of Castleton Commodities Merchant Trading L.P.

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: Castleton Commodities Merchant Trading L.P.

X	Signature	
X	Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)	
X	Application Affidavit	
X	Operations Affidavit	
X	Tax Certification Statement	
X	Commonwealth Department of State Verification	
X	Certificate of Service	

Applicant's Use

PUC Secretary's Bureau Use

List of Exhibits

Exhibit	Title
Exhibit 2.b	Business Entity and Department of State Filings
Exhibit 6	Certificate of Service
Exhibit 7.a	Bonding Letter from UGI
Exhibit 7.b	Organizational Chart, Financial Statements, Tax Returns, and Proof of Insurance
Exhibit 7.f	Tax Certification Statement
Exhibit 8.a	Experience, Plan, Structure
Exhibit 8.e	Operations Officers' Resumes
Exhibit 11	Application and Operations Affidavits

Exhibit 2.b

Business Entity and Department of State Filings

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: Castleton Commodities Merchant Trading L.P.
Request Type: Certificate of Registration Issuance Date: November 06, 2024
Request No.: 045778133 File No: 0003108928
Receipt No.: 1288562
Filing Type: Foreign Limited Partnership
Filing Subtype: Limited Partnership
Initial Filing Date: November 27, 2002
Status: Active

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

I DO HEREBY CERTIFY THAT

Castleton Commodities Merchant Trading L.P.

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
Secretary of the Commonwealth

Verify this certificate online at www.file.dos.pa.gov

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED ARE TRUE AND CORRECT COPIES OF ALL DOCUMENTS ON FILE OF "CASTLETON COMMODITIES MERCHANT TRADING L.P." AS RECEIVED AND FILED IN THIS OFFICE.

THE FOLLOWING DOCUMENTS HAVE BEEN CERTIFIED:

CERTIFICATE OF FORMATION, FILED THE TWENTIETH DAY OF OCTOBER, A.D. 2000, AT 4:28 O`CLOCK P.M.

CERTIFICATE OF CONVERSION, CHANGING ITS NAME FROM "LOUIS DREYFUS PLASTICS LLC" TO "LOUIS DREYFUS ENERGY SERVICES L.P.", FILED THE THIRTY-FIRST DAY OF MAY, A.D. 2001, AT 5:30 O`CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF CONVERSION IS THE FIRST DAY OF JUNE, A.D. 2001 AT 12:01 O`CLOCK A.M.

CERTIFICATE OF LIMITED PARTNERSHIP, FILED THE THIRTY-FIRST DAY OF MAY, A.D. 2001, AT 5:30 O`CLOCK P.M.




Jeffrey W. Bullock, Secretary of State

3305387 8100H
SR# 20230234568

Authentication: 202559737
Date: 01-24-23

You may verify this certificate online at corp.delaware.gov/authver.shtml

Delaware

The First State

Page 2

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF LIMITED PARTNERSHIP IS THE FIRST DAY OF JUNE, A.D. 2001 AT 12:01 O'CLOCK A.M.

CERTIFICATE OF AMENDMENT, FILED THE SEVENTEENTH DAY OF AUGUST, A.D. 2004, AT 3:54 O`CLOCK P.M.

CERTIFICATE OF AMENDMENT, FILED THE TWENTY-EIGHTH DAY OF JUNE, A.D. 2005, AT 8:41 O`CLOCK A.M.

CERTIFICATE OF AMENDMENT, FILED THE THIRD DAY OF MARCH, A.D. 2008, AT 2:52 O`CLOCK P.M.

CERTIFICATE OF AMENDMENT, FILED THE TWELFTH DAY OF JULY, A.D. 2011, AT 1:41 O`CLOCK P.M.

CERTIFICATE OF AMENDMENT, FILED THE FOURTEENTH DAY OF NOVEMBER, A.D. 2011, AT 4:18 O`CLOCK P.M.

CERTIFICATE OF AMENDMENT, CHANGING ITS NAME FROM "LOUIS DREYFUS ENERGY SERVICES L.P." TO "CASTLETON COMMODITIES MERCHANT TRADING L.P.", FILED THE THIRTY-FIRST DAY OF DECEMBER, A.D. 2012, AT 12:37 O`CLOCK P.M.




Jeffrey W. Bullock, Secretary of State

3305387 8100H
SR# 20230234568

Authentication: 202559737
Date: 01-24-23

You may verify this certificate online at corp.delaware.gov/authver.shtml

Delaware

The First State

Page 3

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF AMENDMENT IS THE FIRST DAY OF JANUARY, A.D. 2013.

CERTIFICATE OF MERGER, FILED THE TWENTY-SECOND DAY OF FEBRUARY, A.D. 2018, AT 10:30 O`CLOCK A.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF MERGER IS THE SECOND DAY OF MARCH, A.D. 2018 AT 11:59 O`CLOCK P.M.

CERTIFICATE OF DIVISION, FILED THE SEVENTH DAY OF MAY, A.D. 2021, AT 10:32 O`CLOCK A.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE AFORESAID CERTIFICATES ARE THE ONLY CERTIFICATES ON RECORD OF THE AFORESAID LIMITED PARTNERSHIP, "CASTLETON COMMODITIES MERCHANT TRADING L.P."




Jeffrey W. Bullock, Secretary of State

3305387 8100H
SR# 20230234568

Authentication: 202559737
Date: 01-24-23

You may verify this certificate online at corp.delaware.gov/authver.shtml

CERTIFICATE OF FORMATION**OF****LOUIS DREYFUS PLASTICS LLC**

1. The name of the limited liability company is Louis Dreyfus Plastics LLC.
2. The address of its registered office in the State of Delaware is Corporation Trust Center, 1209 Orange Street, in the City of Wilmington, County of New Castle. The name of its registered agent at such address is The Corporation Trust Company.
3. The latest date upon which the limited liability company is to dissolve is November 1, 2050.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation of Louis Dreyfus Plastics LLC this 20th day of October, 2000.


Carol R. Aronoff
Authorized Person

CERTIFICATE OF CONVERSION
FROM A LIMITED LIABILITY COMPANY TO A
LIMITED PARTNERSHIP

Under Section 17-217 of the
Delaware Revised Uniform Limited Partnership Act

1. The name of the limited liability company to be converted hereby immediately prior to the filing of this Certificate of Conversion is Louis Dreyfus Plastics LLC (the "Limited Liability Company").

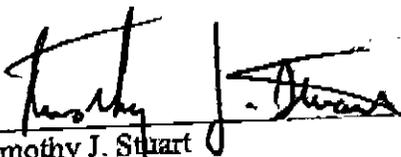
2. The jurisdiction where the Limited Liability Company was first created and its jurisdiction immediately prior to conversion is Delaware.

3. The Limited Liability Company was created on October 20, 2000.

4. The name of the limited partnership as set forth in its Certificate of Limited Partnership is Louis Dreyfus Energy Services L.P.

5. The effective date and time of the conversion is June 1, 2001 at 12:01 a.m.

IN WITNESS WHEREOF, the undersigned has executed this Certificate on May 31, 2001.


Timothy J. Stuart
Authorized Person

CERTIFICATE OF LIMITED PARTNERSHIP
OF
LOUIS DREYFUS ENERGY SERVICES L.P.

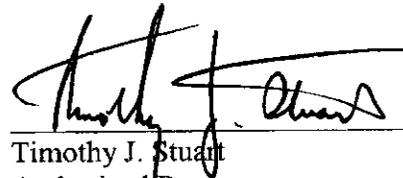
This Certificate of Limited Partnership of LOUIS DREYFUS ENERGY SERVICES L.P. (the "Partnership") is being filed by Louis Dreyfus ES GP LLC, a Delaware limited liability company, as sole general partner, to form a limited partnership under the Delaware Revised Uniform Limited Partnership Act (6 Del. C. §17-101 et. seq.).

1. Name. The name of the limited partnership formed hereby is Louis Dreyfus Energy Services L.P.
2. Registered Office. The address of the registered office of the Partnership in the State of Delaware is c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.
3. Registered Agent. The name and address of the registered agent for service of process on the Partnership in the State of Delaware is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.
4. General Partner. The name and the business address of the sole general partner of the Partnership is Louis Dreyfus ES GP LLC, 10 Westport Road, P.O. Box 810, Wilton, Connecticut 06897.
5. Effective Date and Time: The effective date and time of this Certificate of Limited Partnership is June 1, 2001 at 12:01 a.m.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Limited Partnership on May 31, 2001.

LOUIS DREYFUS ES GP LLC,
General Partner

By:



Timothy J. Stuart
Authorized Person

**CERTIFICATE OF AMENDMENT
TO THE
CERTIFICATE OF LIMITED PARTNERSHIP
OF
LOUIS DREYFUS ENERGY SERVICES L.P.**

The undersigned, desiring to amend the Certificate of Limited Partnership of Louis Dreyfus Energy Services L.P. pursuant to the provisions of Section 17-202 of the Revised Uniform Limited Partnership Act of the State of Delaware, does hereby certify as follows:

FIRST: The name of the Limited Partnership is Louis Dreyfus Energy Services L.P.

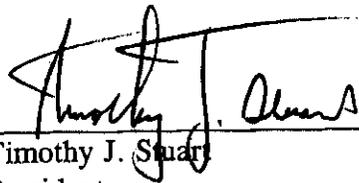
SECOND: Item 4 of the Certificate of Limited Partnership be amended to change the business address of the sole general partner so that, as amended, it will read in its entirety as follows:

4. **General Partner.** The name and the business address of the sole general partner of the Partnership is Louis Dreyfus ES GP LLC, 20 Westport Road, P.O. Box 810, Wilton, Connecticut 06897-0810.

IN WITNESS WHEREOF, the undersigned has executed this Amendment to the Certificate of Limited Partnership on this 17th day of August, 2004.

LOUIS DREYFUS ES GP LLC,
General Partner

By:


Timothy J. Stuart
President

State of Delaware
Secretary of State
Division of Corporations
Delivered 10:49 AM 06/28/2005
FILED 08:41 AM 06/28/2005
SRV 050536235 - 3305387 FILE

CERTIFICATE OF AMENDMENT
TO
CERTIFICATE OF LIMITED PARTNERSHIP
OF
LOUIS DREYFUS ENERGY SERVICES L.P.

It is hereby certified that:

FIRST: The name of the limited partnership (hereinafter called the "partnership") is

LOUIS DREYFUS ENERGY SERVICES L.P.

SECOND: Pursuant to the provisions of Section 17-202, Title 6, Delaware Code, the amendment to the Certificate of Limited partnership effected by this Certificate of Amendment is to change the address of the registered office of the partnership in the State of Delaware to 2711 Centerville Road, Suite 400, Wilmington, DE 19808, and to change the name of the registered agent of the partnership in the State of Delaware at the said address to Corporation Service Company.

The undersigned, a general partner of the partnership, executes this Certificate of Amendment on June 24, 2005.

General Partner: Louis Dreyfus ES GP LLC

Signature: Elizabeth J. Listner
Name: Elizabeth J. Listner
Title: Secretary

State of Delaware
Secretary of State
Division of Corporations
Delivered 02:53 PM 03/03/2008
FILED 02:52 PM 03/03/2008
SRV 080275487 - 3305387 FILE

**CERTIFICATE OF AMENDMENT
TO THE
CERTIFICATE OF LIMITED PARTNERSHIP
OF
LOUIS DREYFUS ENERGY SERVICES L.P.**

The undersigned, desiring to amend the Certificate of Limited Partnership of Louis Dreyfus Energy Services L.P., pursuant to the provisions of Section 17-202 of the Revised Uniform Limited Partnership Act of the State of Delaware, does hereby certify as follows:

FIRST: The name of the Limited Partnership is Louis Dreyfus Energy Services L.P.

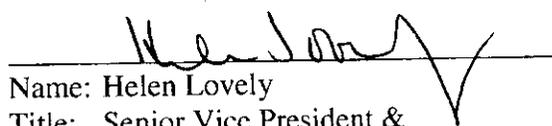
SECOND: Item 4 of the Certificate of Limited Partnership be amended to change the business address of the sole general partner so that, as amended, it will read in its entirety as follows:

4. General Partner. The name and the business address of the sole general partner of the Partnership is Louis Dreyfus ES GP LLC, 20 Westport Road, Wilton, Connecticut 06897.

IN WITNESS WHEREOF, the undersigned has executed this Amendment to the Certificate of Limited Partnership on this 28th day of February, 2008.

LOUIS DREYFUS ES GP LLC
Its General Partner

By: _____


Name: Helen Lovely
Title: Senior Vice President &
Assistant Treasurer

State of Delaware
Secretary of State
Division of Corporations
Delivered 01:44 PM 07/12/2011
FILED 01:41 PM 07/12/2011
SRV 110812530 - 3305387 FILE

**STATE OF DELAWARE
AMENDMENT TO THE
CERTIFICATE OF LIMITED PARTNERSHIP
OF
LOUIS DREYFUS ENERGY SERVICES L.P.**

The undersigned, desiring to amend the Certificate of Limited Partnership of Louis Dreyfus Energy Services L.P., pursuant to the provisions of Section 17-202 of the Revised Uniform Limited Partnership Act of the State of Delaware, does hereby certify as follows:

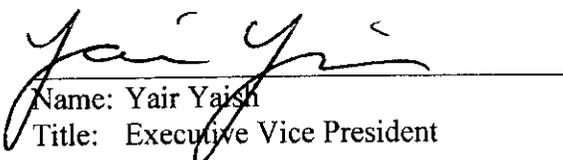
FIRST: The name of the Limited Partnership is Louis Dreyfus Energy Services L.P.

SECOND: Item 4 of the Certificate of Limited Partnership shall be amended to change the address of the sole general partner so that, as amended, it will read in its entirety as follows:

4. The name and the business address of the sole general partner of the Partnership is Louis Dreyfus ES GP LLC, 2200 Atlantic Street, Suite 800, Stamford, Connecticut 06902-6834.

IN WITNESS WHEREOF, the undersigned executed this Amendment to the Certificate of Limited Partnership on this 12th day of July, 2011.

LOUIS DREYFUS ENERGY SERVICES L.P.
By Louis Dreyfus ES GP LLC, its General Partner

By: 
Name: Yair Yaish
Title: Executive Vice President

State of Delaware
Secretary of State
Division of Corporations
Delivered 04:28 PM 11/14/2011
FILED 04:18 PM 11/14/2011
SRV 111194285 - 3305387 FILE

**STATE OF DELAWARE
AMENDMENT TO THE CERTIFICATE OF
LIMITED PARTNERSHIP**

The undersigned, desiring to amend the Certificate of Limited Partnership pursuant to the provisions of Section 17-202 of the Revised Uniform Limited Partnership Act of the State of Delaware, does hereby certify as follows:

FIRST: The name of the Limited Partnership is Louis Dreyfus Energy Services L.P.

SECOND: Article 3 of the Certificate of Limited Partnership shall be amended as follows: The address of the general partner of the limited partnership is:

2200 Atlantic Street, Suite 800

Stamford, CT 06902-6834

IN WITNESS WHEREOF, the undersigned executed this Amendment to the Certificate of Limited Partnership on this 29th day of August, A.D. 2011.

By: Louis Dreyfus ES GP LLC

its General Partner(s)



Name: Iliana Guillen, Assistant Secretary

Print or Type

State of Delaware
Secretary of State
Division of Corporations
Delivered 12:44 PM 12/31/2012
FILED 12:37 PM 12/31/2012
SRV 121408064 - 3305387 FILE

**STATE OF DELAWARE
AMENDMENT TO THE
CERTIFICATE OF LIMITED PARTNERSHIP
OF
LOUIS DREYFUS ENERGY SERVICES L.P.**

The undersigned, desiring to amend the Certificate of Limited Partnership of Louis Dreyfus Energy Services L.P., pursuant to the provisions of Section 17-202 of the Revised Uniform Limited Partnership Act of the State of Delaware, does hereby certify as follows:

FIRST: The name of the Limited Partnership is:

Louis Dreyfus Energy Services L.P.

SECOND: Articles 1 and 4 of the Certificate of Limited Partnership shall be amended so that, as amended, it will read in its entirety as follows:

1. The name of the limited partnership is:

Castleton Commodities Merchant Trading L.P.

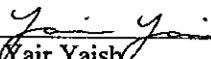
4. The name and the business address of the sole general partner of the Partnership is:

Castleton Commodities Trading GP LLC
2200 Atlantic Street
Suite 800
Stamford, Connecticut 06902-6834

THIRD: This Amendment to the Certificate of Limited Partnership shall be effective on January 1, 2013.

IN WITNESS WHEREOF, the undersigned executed this Amendment to the Certificate of Limited Partnership on this 31st day of December, 2012.

Castleton Commodities Merchant Trading L.P.
By: Castleton Commodities Trading GP LLC, its General Partner

By: 
Name: Yair Yaish
Title: Executive Vice President

State of Delaware
Secretary of State
Division of Corporations
Delivered 10:30 AM 02/22/2018
FILED 10:30 AM 02/22/2018
SR 20181226290 - File Number 3305387

STATE of DELAWARE
CERTIFICATE OF MERGER
OF
A DOMESTIC LIMITED LIABILITY COMPANY INTO
A DOMESTIC LIMITED PARTNERSHIP

Pursuant to Title 6, Section 18-209 of the Delaware Limited Liability Company Act and Section 17-211 of the Delaware Revised Uniform Limited Partnership Act, the undersigned limited partnership executed the following Certificate of Merger:

FIRST: The name of each constituent entity is **Castleton Commodities Merchant Trading L.P.**, a Delaware limited partnership, and **Rolympus (US) Commodities Group, LLC**, a Delaware limited liability company.

SECOND: The Agreement of Merger has been approved, adopted, certified, executed and acknowledged by each of the constituent entities.

THIRD: The name of the surviving entity is **Castleton Commodities Merchant Trading L.P.**, a Delaware limited partnership.

FOURTH: The Agreement of Merger is on file at 2200 Atlantic Street, Suite 800, Stamford, CT 06902-6834, which is the place of business of the surviving limited partnership.

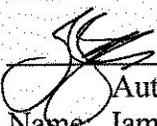
FIFTH: The merger is to become effective on March 2, 2018 at 11:59 p.m.

SIXTH: A copy of the Agreement of Merger will be furnished by the surviving limited partnership, on request and without cost, to any partner or member of the constituent entities.

IN WITNESS WHEREOF, said surviving limited partnership has caused this certificate to be signed by its general partner on the 22 day of February, 2018.

**CASTLETON COMMODITIES MERCHANT
TRADING L.P.**

**By: Castleton Commodities Trading GP LLC,
its General Partner**

By:  _____
Authorized Person(s)
Name: James J. Wrigley, SVP

HAL

State of Delaware
Secretary of State
Division of Corporations
Delivered 10:32 AM 05/07/2021
FILED 10:32 AM 05/07/2021
SR 20211645349 - File Number 3305387

**CERTIFICATE OF DIVISION
OF**

CASTLETON COMMODITIES MERCHANT TRADING L.P.

This Certificate of Division, dated as of May 7, 2021, is being duly executed and filed by Castleton Commodities Trading GP LLC, as the sole general partner of Castleton Commodities Merchant Trading L.P., a Delaware limited partnership (the "Dividing Partnership"), on behalf of the Dividing Partnership, to divide the Dividing Partnership (the "Division") in accordance with Section 17-220 of the Delaware Revised Uniform Limited Partnership Act (the "Act").

1. The Dividing Partnership's name is Castleton Commodities Merchant Trading L.P. and the name under which its certificate of limited partnership was originally filed was Louis Dreyfus Energy Services L.P. The Dividing Partnership is a surviving partnership in the Division.

2. The Dividing Partnership's original certificate of limited partnership was filed with the Secretary of State of the State of Delaware on May 31, 2001.

3. The name of each division partnership in the Division (collectively, the "Division Partnerships") is as follows:

Castleton Commodities Merchant Trading L.P.

Castleton Commodities Merchant Trading TX L.P.

4. The name and business address of the division contact required by Section 17-220(g)(3) of the Act are Castleton Commodities Merchant Trading L.P. at 2200 Atlantic Street, Suite # 800 Stamford, CT 06902.

5. The Division shall be effective upon the filing of this Certificate of Division with the Secretary of State of the State of Delaware.

6. The Division has been approved in accordance with Section 17-220 of the Act.

7. The plan of division is on file at a place of business of Castleton Commodities Merchant Trading L.P. The address of such place of business of such Division Partnership is 2200 Atlantic Street, Suite # 800 Stamford, CT 06902.

8. A copy of the plan of division will be furnished by the Division Partnership identified in paragraph 7 above, on request and without cost, to any partner of the Dividing Partnership.

[Signature Page Follows]

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

GENERAL PARTNER:

Castleton Commodities Trading GP LLC

By: 

Name: Steven M. Bunkin

Title: Executive Vice President

Exhibit 6
Certificate of Service

CERTIFICATE OF SERVICE

On this 26th day of November, 2024, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom or a USB flash drive, upon the following:

Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101

Office of Small Business Advocate
Forum Place, 1st Floor
555 Walnut Street
Harrisburg, PA 17101

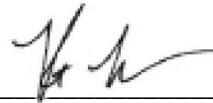
**Pennsylvania Public Utility
Commission Bureau of Investigation &
Enforcement**
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

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

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

UGI Utilities, Inc. – Gas Division
Sherry Epler
1 UGI Drive
Denver, PA 17517
PH: 610.796.3447
E-mail: sepler@ugi.com

Respectfully submitted,



Robert Ruckman
Head of North American Gas & Power
Castleton Commodities Merchant
Trading, L.P.
203-564-8100
robert.ruckman@cci.com

Exhibit 7.a
Bonding Letter from UGI



UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517
610-796-3400

VIA E-MAIL

November 21, 2024

Castleton Commodities Merchant Trading L.P.
c/o Castleton Commodities International, LLC
2200 Atlantic Street
Suite 800
Stamford, CT 06902-6834

ATTENTION: **Bryan Dooley**
 Physical Natural Gas Trader
 bryan.dooley@cci.com

RE: UGI Financial Security Requirements

Dear Mr. Dooley,

UGI Utilities, Inc.–Gas Division (hereinafter “UGIU”) has reviewed the application of Castleton Commodities Merchant Trading L.P. (hereinafter “Castleton Commodities”) for approval to operate as a Natural Gas Supplier. Based on this initial review, Castleton Commodities must post security as specified in the UGIU Supplier Coordination Tariff before it serves customers on the UGIU distribution systems. 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>. Once such security is posted with UGIU, Castleton Commodities will have demonstrated adequate creditworthiness to UGIU in order to operate as a Natural Gas Supplier on the UGIU distribution system.

This determination may change in the event there is a material deterioration in Castleton Commodities’ financial condition, if Castleton Commodities’ 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 Castleton Commodities 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,

A handwritten signature in blue ink that reads "Sherry Epler". The signature is written in a cursive, flowing style.

Sherry Epler
Senior Manager
Tariff & Supplier Administration

SE/rks

Exhibit 8.a
Experience, Plan, Structure

EXPERIENCE, PLAN, STRUCTURE

1 Applicant's previous experience in the natural gas industry.

Castleton Commodities Merchant Trading L.P. ("CCMT") is a Delaware limited partnership that participates in global commodity markets including the wholesale market for purchases and sales of Natural Gas. Excluding integrated oil and financial institutions, CCMT is a Top-10 North American Natural Gas marketer by volumes traded. CCI, CCMT's parent company, has 25+ years of experience in the wholesale gas and power markets. Our core activities are supplying gas to utilities and power generators and marketing gas for producers. On a typical day, CCI transports over 5 Bcf of gas to meet the needs of its clients and customers.

2 Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.

CCMT is licensed as a natural gas supplier in Connecticut (License No. 20-01). A copy of the license is attached to this Exhibit 8.a.

3 Type of customers and number of customers Applicant currently serves in other jurisdictions.

CCMT is not currently an active retail supplier in Connecticut and does not currently serve any customers there. CCMT primarily participates in the wholesale gas market as a buyer and seller. Pennsylvania is anticipated to be the only jurisdiction other than Connecticut in which CCMT will hold a retail license.

4 Staffing structure and numbers as well as employee training commitments.

CCMT's exclusive focus will be serving commercial and industrial customers in the Commonwealth. CCMT has natural gas commercial personnel, schedulers, confirmations and settlements employees, and other staff members that handle the day-to-day requirements of these customers.

CCMT currently provides natural gas service at wholesale and retail across several states, and has an appropriately sized confirms team. CCMT's in-house confirms team allows for supervision, oversight, and quality control. CCMT is in a unique position in that it does not outsource its key customer service functions, thereby creating a better overall customer experience. CCMT maintains several communication channels for its customers to use, such as telephone and electronic mail.

CCI, CCMT's ultimate parent company, maintains robust policies designed to ensure compliance with applicable laws and regulations. As stated in the Corporate Governance and Compliance section of CCI's website (<https://www.cci.com/about-us/responsibility/>), CCI's operations are defined by high standards of corporate governance focused on integrity, transparency, and accountability. CCI is committed to maintaining the highest ethical and legal standards and to managing its business in compliance with all applicable laws and regulations

wherever we operate. As part of these standards, CCI maintains a Code of Ethical Business Conduct that governs the activities of all CCI and CCMT employees, alongside a set of comprehensive compliance policies, and we hold regular compliance trainings to ensure the highest standards of business conduct across our global operations.

5 Business plans for operations within the Commonwealth.

CCMT currently intends to supply gas to Hunlock Power Plant, a natural gas generator owned by CCI. In the future, CCMT intends to supply gas to other generator(s) and possibly other large commercial customers in the UGI service territory.



STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

October 2, 2024
In reply, refer to: EOE: AA

Marissa Miraval
Castleton Commodities Merchant Trading, LP
2200 Atlantic Street, Suite 800
Stamford, CT 06902

Re: Natural Gas Supplier Registration Number 20-01

Dear Ms. Miraval:

On July 2, 2024, the Public Utilities Regulatory Authority (Authority) received a natural gas seller registration application, a \$500 application fee and a Surety Bond number 107254679, in the amount of \$100,000.00, from Castleton Commodities Merchant Trading, LP (Castleton of Company).

The Authority finds that Castleton satisfied the registration requirements and hereby issues the Company a natural gas registration for the period through September 30, 2025. The registration number for Castleton is 20-01. Please note that to continue its registration beyond September 30, 2025, the Company must submit to the Authority a renewal application and a \$500 application fee prior to July 15, 2025.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach & Enforcement

Exhibit 8.e
Operations Officers' Resumes

Richard Dolcetti

Managing Director – Chief Financial Officer at Castleton Commodities International

Stamford, Connecticut

Summary

Mr. Dolcetti is CCI's Chief Financial Officer and previously served as its Global Tax Director. Prior to joining CCI in 2016, Mr. Dolcetti was responsible for tax planning, advisory, and compliance for all trading and investment funds at Point 72 Asset Management. Prior to that, he spent nine years at GE Capital in various tax, risk, and transaction advisory roles. He began his career at Arthur Andersen as a financial statement auditor and subsequently served as a Tax Manager in its Transaction Advisory Services Group advising investment banks and private equity firms on tax matters.

Mr. Dolcetti holds a J.D. from The George Washington University Law School, a B.S. in Accounting from Boston College, and is a Certified Public Accountant.

Experience

Castleton Commodities International | October 2016 – Present

Managing Director - Chief Financial Officer
March 2021 - Present (3 years 9 months)

Managing Director - Global Tax Director
October 2016 - March 2021 (4 years 6 months)

Point 72 Asset Management | Director | August 2011 - October 2016

- Provide tax advice related to all portfolio investments for large asset management firms. Investments include publicly traded securities in multiple global jurisdictions, derivative transactions, and private equity investments.
- Initiate tax planning and conduct research relevant to portfolio investments.
- Supervise tax return and K-1 reporting processes.
- Work closely with the firm's outside tax advisors on all tax issues related to the funds.
- Enhance the effectiveness of processes, including working with the internal technology group to develop automated solutions.

GE Energy Financial Services | Vice President & Tax Counsel | April 2002 - August 2011

- Provide tax structuring support to underwriting and portfolio deal teams. Deals supported include purchases and sales of power plants, natural gas pipelines, oil & gas reserves, and transmission lines. Significant experience structuring partnership transactions and corporate acquisitions.
- Negotiate tax provisions in deal documents related to new investments and portfolio transactions.
- Manage external tax counsel, including review of tax opinions and drafting of purchase/sale agreements.
- Review financial models to ensure compliance with tax law.
- Perform and coordinate tax due diligence on proposed transactions.
- Coordinate tax compliance and accounting related to new investments.

Arthur Anderson LLP | Tax Manager – Transaction Advisory Services | April 1999 - April 2002

- Provided investment banks, private equity firms, and strategic buyers with tax advice related to the structuring of corporate transactions including the ability to effect tax-free reorganizations, implement tax-efficient capital structures, utilize net operating losses, and dispose of unwanted assets.

Cummings & Lockwood | Associate | 1998 - 1999

Education

The George Washington University Law School

JD, with honors | 1995 – 1998 | Washington, D.C.

Boston College

BS, magna cum laude, Accounting | 1988 – 1991 | Boston, MA

DATE OF BIRTH: 30.10.84; NATIONALITY: Spanish; TEL.: +44 (0) 7342883709; E-MAIL: ariepilo@gmail.com
HOME ADDRESS: Alderney House, Goldrings Road, Oxshott, Surrey KT22 0QP (UK)

Professional Experience

Oct 2015 – Present

Castleton Commodities International

Managing Director, Head of Power PI & Asset Backed Trading (London, United Kingdom)

- Direct report to the company's CEO, member of CCP's Executive Committee & Investment Committee
- Started CCP's EMEA gas & power physical businesses in 2016 – delivered superior risk-adjusted returns every year since inception and currently established as one of the firm's core platforms (verbal update)
- Acquisition, integration & monetization of 2,000MW+ flexible generation portfolio and CSSOs
- Creation of asset-backed trading & optimization strategies delivering multi location and fuel optionality across north and southern Europe
- Exposure / access to liquid and illiquid physical gas & power hubs
- Monetization of ancillary services markets through asset-backed strategies
- In EMEA, platform includes a team of 2 deal-execution professionals, 2 traders, 3 research, 1 engineer
- Since August 2020, interim oversight of NA physical power business

Nov 2012 – Oct 2015

Mercuria Energy Trading

Director – Investments (Geneva, Switzerland & London, United Kingdom)

- Direct report to the company's CEO and sole responsible for EMEA gas & power asset investments & Latam E&P opportunities
 - Principal investments from Mercuria's balance sheet across asset classes (equity, debt, convertibles)
 - Non-executive director (representing Mercuria) in the board of Amromco Energy and Henry Bath investments
- Selected deal / Portfolio Company experience:*
- **Amromco Energy** - \$60mm – Investment in partnership with First Reserve through a mix of common equity and a convertible bond
 - Largest independent gas producer in Romania (30Mcfed) with significant (200Bfc +) reserves in country
 - Setting up Mercuria's in country presence in Romania for gas trading (new market)
 - **Andes Energia** - \$70mm – Equity investment into AIM listed Latin American E&P group
 - Operations in Argentina (primary focus), Colombia, Brazil and Paraguay
 - **Henry Bath** \$100mm – Equity investment into LME metals warehouse company
 - Mercuria acquired Henry Bath as part of the acquisition of the JPM commodities business

Sep 2009 – Nov 2012

First Reserve Corporation

Associate – Private Equity (London, United Kingdom)

- First Reserve, an energy-focused private equity firm with \$25 billion in capital under management
 - Primary responsibilities included idea generation, transaction analysis, execution and portfolio company monitoring
- Selected deal / portfolio company experience:*
- **Ansaldo Energia** - \$1,700mm – Ansaldo Energia supplies gas and steam turbines for the construction of combined and simple cycle power plants, and nuclear power plants – First Reserve acquired 45% of Ansaldo in March 2011
 - **Glencore** – \$800m Pre IPO-Convertible bond. First ever external investment into Glencore
 - **9Ren** - \$320mm – Previously known as Gamesa Solar. 9Ren is a leading European solar energy IPP focused on the development, construction and operation of solar photovoltaic plants

Jul 2007 – Sep 2009

Citigroup Global Markets

Analyst (European Investment Bank – M&A team)

- Participated in execution of sell-side, buy-side, merger, debt and equity deals
 - Top ranked analyst in 2008 (as analyst I) and 2009 (as analyst II) (top 2% of my class)
- Selected deal experience:*
- Advisor to Gamesa in the sale of its solar energy business to First Reserve Corporation (€261m, February 2008)
 - Advisor to Naturgy on its tender offer for Unión Fenosa (€16,757m, August 2008)
 - Advisor to Naturgy on the acquisition of a 45.3% stake in Unión Fenosa (€7,590m, July 2008)
 - Advisor to Naturgy in its €3,500m capital increase to finance the acquisition of Unión Fenosa (Citi acted as Joint Global Coordinator and Underwriter) (€3,500m, March 2009)

Jun 2006 – Aug 2006

Brokermat

Trainee (Ferroalloys trading desk)

Education

2005 – 2007

Suffolk University (Boston, USA)

BSBA Management: Graduated Magna Cum Laude in June 2007 (GPA: 3.8)

Member of the student honor society. Dean's Honors List

President (elected) of the Sawyer School of Management's markets & investment club

2002 – 2005

Colegio Universitario de Estudios Financieros, C.U.N.E.F (Madrid, Spain)

Completed the first two years of Business Management and transferred to Suffolk University

Languages

- Spanish – mother tongue written and spoken
- English – bilingual level written and spoken
- French – Conversational
- Italian – Conversational

Exhibit 11
Application and Operations Affidavit

Appendix A

APPLICATION AFFIDAVIT

State of Connecticut :

ss.

County of Fairfield :

Richard Dolcetti, Affiant, being duly sworn according to law, deposes and says that:

He is the Chief Financial Officer of Castleton Commodities Trading GP LLC, the General Partner of Castleton Commodities Merchant Trading L.P.

That he is authorized to and does make this affidavit for said Applicant;

That the Applicant herein Castleton Commodities Merchant Trading L.P. 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 Castleton Commodities Merchant Trading L.P. has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein Castleton Commodities Merchant Trading L.P. 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 Castleton Commodities Merchant Trading L.P. 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 knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

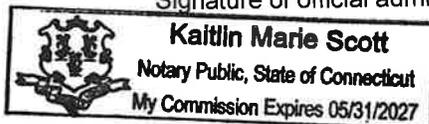


Signature of Affiant

Sworn and subscribed before me this 26th day of November, 2024.



Signature of official administering oath



My commission expires _____



Appendix B

OPERATIONS AFFIDAVIT

State of Connecticut :

ss.

County of Fairfield :

Richard Dolcetti, Affiant, being duly sworn according to law,
deposes and says that:

He is the Chief Financial Officer of Castleton Commodities Trading GP LLC, the
General Partner of Castleton Commodities Merchant Trading L.P. ;

That he is authorized to and does make this affidavit for said Applicant;

That Castleton Commodities Merchant Trading L.P., the Applicant herein, acknowledges that Castleton Commodities Merchant Trading L.P. 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 Castleton Commodities Merchant Trading L.P., the Applicant herein, asserts that 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 Castleton Commodities Merchant Trading L.P. , 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 Castleton Commodities Merchant Trading L.P., 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 26th day of November, 2024.



Signature of official administering oath

My commission expires 

