



January 8, 2025

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

To Whom It May Concern:

Ref: Utiliz Services, LLC PA EGS Broker application – Docket # A-2024-3050636

In your data request letter dated 01/02/2025, the Pennsylvania Public Utility Commission requested that Utiliz Services, LLC explains what type of safeguards Utiliz Services, LLC has implemented in order to avoid the concerning practices mentioned in the NOTICE OF VIOLATION, CIVIL PENALTY IN THE AMOUNT OF \$3,000,000, AND RESTITUTION TO CUSTOMERS, issued by the State of Connecticut, Public Utilities Regulatory Authority at Docket No. 14-03-03 on May 21, 2024.

Below is our response.

First, it should be noted that Utiliz Services, LLC, was not named in the Notice of Violation, and did not file a response. Utiliz Services, LLC, disagrees with the conclusions PURA reached about Utiliz's conduct in connection with the Connecticut customers at issue, and nothing herein should be construed as an agreement with the allegations made by CT PURA. Further, it is important to note that no customer was harmed or overcharged in any way by Utiliz or Major. The fact that Major was willing to accept the customers on rates that were lower than the price to compare, and they were the most favorable option in that market for the customers involved, confirms that Utiliz met its obligation of providing the best value to its customers.

Secondly, both Utiliz and Major have exited the Connecticut market because the regulatory environment in that state is too convoluted and burdensome for businesses to operate. Connecticut's regulatory scheme for energy brokers is inverted from that of every other deregulated state. There is no license in Connecticut for a company to act as a broker for customers and earn commissions from suppliers. Rather, a company can get an aggregator license if they look to receive payment only from the customers and represent the customer's interests. If a company wishes to derive commissions from the supplier, the only option in Connecticut is to have the supplier enroll the company as an "Agent" of the supplier. That is the regulatory framework under which Utiliz and Major were conducting business in Connecticut.

Because the regulatory framework in Pennsylvania allows Utiliz to follow the traditional broker model, there is no need for it to impose any special safeguards against the concerns

Utiliz Services, LLC. - 7880 San Felipe Ste 210, Houston TX 77063 Tel: (844) 707-5757 (M-F 10am-4pm)

