

Cover Page

Docket # A-2024-3049891

NGS Application

Enclosed please find Attachment for 7.a

Bond requirement Letters

These are updated letters reflecting the new name

IES of PA LLC

Used in our most recent application

December 30, 2024

Steven Stern
IES of PA LLC
125 Glen Ave
Lakewood, NJ 08701

Dear Steven Stern:

We are pleased that IES of PA 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, IES of PA 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. IES of PA LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that IES of PA 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 IES of PA LLC changes in the future, Columbia Gas might deem it appropriate to require IES of PA 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[®]

December 31, 2024

Attention: Steven Stern- Director
IES of PA, LLC
125 Glen Ave
Lakewood NJ 08701

Dear Steven,

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



pecoSM

AN EXELON COMPANY

January 2, 2025

Steven Stern, Director
IES of PA, LLC
125 Glen Avenue
Lakewood, NJ 08701

Re: Bonding Requirements

Dear Steven Stern:

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

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

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

Respectfully submitted,

Suzette Adams

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



375 North Shore Drive
Pittsburgh, Pennsylvania 15212

www.peoples-gas.com

Carol Scanlon
Manager, Rates

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

December 30, 2024

Mr. Steven Stern
Director
IES of PA LLC
125 Glen Ave
Lakewood, NJ 08701

Dear Mr. Stern:

We are pleased that IES of PA LLC has applied for a license to provide natural gas services on Peoples Natural Gas Company LLC.

Since IES of PA LLC is not currently serving customers on the Peoples systems, we have determined at this time that IES of PA 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 IES of PA LLC's provision of services on the Peoples' system changes in the future, the Company may deem it appropriate to require a bond or other financial instrument.

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

Sincerely,

Carol Scanlon
Manager, Rates
Peoples Natural Gas Company LLC

Cc: Stephen Kelly
Mina Speicher



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

12/31/24

Mr. Steven Stern
125 Glen Ave
Lakewood, NJ 08701

Email: sstern@integrityenergyadvisors.com

RE: Security Requirement Bond for IES of PA LLC

Dear Mr. Stern:

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

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

If you have any questions concerning the foregoing, please contact me at 215-684-6726.

Sincerely,

Robert Smith

Robert K. Smith
Sr. Vice President - Operations, Supply Chain, & Gas
Management

/js



UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17527

610-796-3400

VIA E-MAIL

January 2, 2025

IES of PA, LLC
125 Glen Avenue
Lakewood, NJ 08701

ATTENTION: **Steven Stern, Director**
 sstern@integrityenergyadvisors.com

RE: IES of PA, LLC
 Application to Serve as a Natural Gas Broker

Dear Mr. Stern,

Based on your assertion that IES of PA, LLC ("IES") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc.-Gas Division ("UGIU") has concluded that IES will not need to post security with UGIU. This is based on the declaration that IES 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 IES 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

December 30, 2024

VIA EMAIL

Steven Stern
IES of PA, LLC
125 Glen Ave
Lakewood, NJ 08701
sstern@integrityenergyadvisors.com

RE: IES of PA, LLC

Dear Mr. Stern:

We understand that IES of PA, 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 IES of PA, LLC when it begins to serve customers on Valley Energy's system. Valley Energy will determine whether IES of PA, 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 IES of PA, 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