



Disney Cruz

Regulatory Reporting Analyst  
BP Energy Retail Company

BP Energy Retail Company  
201 Helios Way  
Houston, TX  
77079

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January 23, 2024

VIA EMAIL

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

Reference: BP Energy Retail Company, LLC (BPERC) PAPUC Natural Gas Supplier License Application  
Docket No. A-2025-3052963, Utility Code 1227659

This letter is in response to the eServe Notice received January 17, 2025 stating that Section 7.a of the Application was incomplete or not properly completed (missing bonding letters from NGDC's).

To fulfill this deficiency, please find attached the following bonding letters from NGDC's:

- Columbia Gas of Pennsylvania Inc.
- National Fuel Gas Distribution Corp.
- Peoples Natural Gas Company LLC – Peoples Natural Gas, Peoples Gas Division
- PECO
- Philadelphia Gas Works
- UGI Utilities, Inc. – Gas Division
- Valley Energy, Inc.

Please contact the undersigned if you require additional information regarding this filing.

Sincerely,  
/s/ Disney Cruz  
Regulatory Reporting Analyst  
[disney.cruz@bp.com](mailto:disney.cruz@bp.com)



December 11, 2024

Disney Cruz  
Reporting Analyst  
BP Energy Retail Company LLC  
201 Helios Way  
Houston, TX 77079

Dear Disney Cruz:

We are pleased that BP Energy Retail Company LLC has applied for a license to provide Natural Gas Supply Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.1 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, it is required that the Natural Gas Supplier provide financial information for the Company to establish the Natural Gas Supplier's creditworthiness. After approval of your application to Columbia Gas, but before the enrollment of customers, BP Energy Retail Company LLC will be required to provide financial security.

Since BP Energy Retail Company LLC is not currently serving customers on the Columbia Gas System, we have determined BP Energy Retail Company LLC does not need a bond or other financial security requirement at this time.

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

Please feel free to contact me at 614-460-4217 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 5, 2024

Disney Cruz  
BP Energy Retail Company LLC  
201 Helios Way  
Houston, TX 77079

Dear Disney,

Pursuant to 66 Pa. C. S. § 2208 (c), an applicant for a natural gas supplier license in the Commonwealth of Pennsylvania must furnish security to each utility where the supplier will do business to ensure the financial responsibility of such natural gas supplier. To this end, National Fuel Gas Distribution Corporation (“National Fuel”) will perform a credit review and analysis of BP Energy Retail Company LLC (BER) and determine at the appropriate time whether BER must post a security deposit acceptable to National Fuel in order to operate as a supplier on National Fuel’s system.

BER’s security requirement to serve Pennsylvania customers is dependent on the type of transportation service utilized by BER. There is no Natural Gas Supplier (NGS) security requirement for customers that will be enrolled in National Fuel’s Purchase of Receivable (POR) program. As such, BER will not be required to post security for customers enrolled in the POR program. A security deposit will be required for transportation customers not enrolled in the POR program.

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

Yours truly,

Jason Allen  
Transportation Service Department



375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

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

**Carol Scanlon**  
Manager, Rates

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

December 11, 2024

Ms. Deborah Merrill  
President  
BP Energy Retail Company LLC  
201 Helios Way  
Houston, TX 77079

Dear Ms. Merrill:

We are pleased that BP Energy Retail Company 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 BP Energy Retail Company LLC is not currently serving customers on the Peoples systems, we have determined at this time that BP Energy Retail Company 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 BP Energy Retail Company 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



peco<sup>SM</sup>

AN EXELON COMPANY

December 12, 2024

Disney Cruz  
BP Energy Retail Company, LLC  
201 Helios Way  
Houston, TX 77079

Re: Bonding Requirements

Dear Morley Shulman:

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

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12/2/24

Disney Cruz  
201 Helios Way  
Houston, TX 77079

Email: [disney.cruz@bp.com](mailto:disney.cruz@bp.com)

Dear Disney Cruz:

Re: Security Requirement for BP Energy Retail Company LLC

Philadelphia Gas Works ("PGW") is aware that BP Energy Retail Company 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 service territory of Philadelphia Gas Works. You have stated that, in performing these services, BP Energy Retail Company LLC will take title to any delivered natural gas.

Under its tariff, Philadelphia Gas Works could require BP Energy Retail Company LLC to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate. Upon final approval of your application to PGW and prior to enrolling customers, security in the first year for firm pools will be required based on your estimated firm pool size. It will be updated annually based on actual firm pool size.

At this time, BP Energy Retail Company LLC does not need to post a bond or other form of security.

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 17517

610-796-3400

**VIA E-MAIL**

December 11, 2024

BP Energy Retail Company, LLC  
201 Helios Way  
Houston, TX 77079

**ATTENTION:**        **Disney Cruz**  
                              **Reporting Analyst**  
                              [Disney.cruz@bp.com](mailto:Disney.cruz@bp.com)

**RE:    UGI Financial Security Requirements**

Dear Mr. Cruz,

UGI Utilities, Inc.–Gas Division (hereinafter “UGIU”) has reviewed the application of BP Energy Retail Company, LLC (hereinafter “BP Energy”) for approval to operate as a Natural Gas Supplier. Based on this initial review, BP Energy 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](https://ugi.outsystemsenterprise.com/UGITariffFO/Tariffs). Once such security is posted with UGIU, BP Energy 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 BP Energy’s financial condition, if BP Energy’s 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 BP Energy 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,

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

November 27, 2024

**VIA EMAIL**

Disney Cruz, Regulatory Analyst  
BP Energy Retail Company  
201 Helios Way  
Houston, TX 77079  
[Disney.cruz@bp.com](mailto:Disney.cruz@bp.com)

**RE: BP Energy Retail Company**

Dear Mr. Cruz:

We understand that BP Energy Retail Company 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 BP Energy Retail Company when it begins to serve customers on Valley Energy's system. Valley Energy will determine whether BP Energy Retail Company 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 BP Energy Retail Company 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