



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

February 10, 2025

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: *Castleton Commodities Merchant Trading L.P.* – Docket No. A-2024-3052397
Natural Gas Supplier License Application**

Dear Secretary:

On January 22, 2025 you requested additional information in regards to Castleton Commodities Merchant Trading L.P.'s ("CCMT") application for a Natural Gas Supplier license in the above-noted docket. Specifically, you indicated that Sections 1.b, 4.a, and 7.b of the CCMT application were incomplete or not properly completed. You requested that CCMT submit revised Application pages for Section 1, and respond to the other questions contained in the data request within thirty (30) days. In response to your request, please find the below Data Request Response, as well as associated Attachments.

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

Sincerely,

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

Robert Ruckman

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

CCMT Data Request Response

1. Reference Application, Section 1.b, Registered Agent – Applicant failed to provide a name, address, telephone number or FAX number for the applicant’s registered agent **within Pennsylvania**. Please provide an updated Application page with the appropriate correction.

*Please see **Attachment A** to this Response, containing updated Section 1.b information.*

2. Reference Application, Section 4.a, Present Operations – Applicant checked the box, indicating that it is not presently doing business in Pennsylvania. Applicant also stated the following in Section 7.b: “CCMT also submits its Pennsylvania Sales, Use, and Hotel Occupancy Tax Returns. CCMT does not independently file state or federal income taxes.” Please explain why the Applicant is submitting the Pennsylvania related tax information if the Applicant is *not presently* doing business in Pennsylvania?

*Please see **Attachment A** to this Response, which contains an updated response to Section 4.a. CCMT does not currently do business as a natural gas interstate pipeline, a municipality providing service outside its municipal limits, a local gas distribution company, a retail supplier of natural gas services in the Commonwealth, a natural gas producer, or a broker/marketer engaged in the business of supplying natural gas services in Pennsylvania. However, CCMT does “sink”, or end, certain wholesale trading transactions made pursuant to its FERC-approved Market-Based Rate (“MBR”) authority in Pennsylvania. CCMT was required to obtain a Pennsylvania Sales/Use tax license for these purposes.*

3. Reference Application, Section 7.b, Financial Fitness – Applicant provided insufficient documentation to demonstrate financial fitness. Please provide additional financial fitness documentation that may include two recent consecutive years of income tax filings and at least six recent consecutive months of bank statements.

*Please see **Attachment B** to this Response, which contains **CONFIDENTIAL** CCMT bank statements for the last six consecutive months. CCMT does not independently file state or federal tax returns.*

VERIFICATION

I, Robert Ruckman, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature 
Authorized Signatory for Castleton Commodities
Trading GP LLC, the general partner of Castleton
Title Commodities Merchant Trading L.P.
Date 2-10-2025

Attachment A
Updated Application Excerpts

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.

***Name:** Corporation Service Company
Address: 251 Interstate Drive, Suite 103, Harrisburg, PA 17110
Telephone Number: 800-927-9800
Fax Number: 302-636-5454*

- 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

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)

Castleton Commodities Merchant Trading L.P. ends/sinks certain wholesale trading transactions made pursuant to its FERC-approved Market-Based Rate authority in Pennsylvania. Castleton Commodities Merchant Trading L.P. does not have traders physically located in Pennsylvania.

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.

- | | |
|---|--|
| <input type="checkbox"/> Columbia | <input type="checkbox"/> 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.