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February 26, 2025

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

RE: Penneco Oil Company, Inc.; Docket No. A-125104; **REPORTING OF NON-JURISDICTIONAL SALES OF NATURAL GAS**

Dear Secretary Chiavetta:

The purpose of this letter is to inform the Commission that Penneco Oil Company, Inc. (“Penneco”) has recently discovered that it has been reporting non-jurisdictional sales of natural gas as sales of gas for purposes of filing its annual sales reports as a licensed Natural Gas Supplier (“NGS”).<sup>1</sup> The sales that were reported are of “reserved gas” that is provided to end-users according to the terms of an oil or gas lease,<sup>2</sup> which do not use the jurisdictional facilities of a natural gas distribution company (“NGDC”). The erroneous reports were made based upon an incorrect understanding that any sale/transfer of gas was to be reported. Penneco’s records show that it has been reporting these transfers as retail sales at least since 2018. While Penneco understands that as an NGS it is required to file annual sales reports, which in the future will reflect no retail sales, it also understands that a sudden change in the sales reported is likely to raise questions and so is taking the pro-active step in providing this letter prior to filing its annual report.

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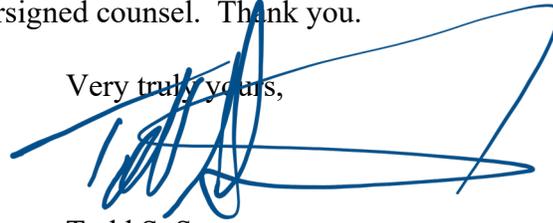
<sup>1</sup> License A-125104.

<sup>2</sup> 66 Pa. C.S. § 2202.

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Penneco wishes to retain its NGS license and will continue to comply with all applicable reporting requirements, revised to reflect actual sales, if any. If you have any questions regarding this notification, please direct them to the undersigned counsel. Thank you.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Todd S. Stewart', is written over the closing text. The signature is stylized and somewhat abstract, with a large loop at the end.

Todd S. Stewart  
*Counsel for Penneco Oil Company, Inc.*

TSS/jld