

ELLIS | LAW

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March 11, 2025

VIA PENNSYLVANIA PUC E-FILING PORTAL: <<https://efiling.puc.pa.gov/>>

Mr. Jeff McCracken
Pennsylvania Public Utilities Commission
400 North Street
Keystone Building
Harrisburg, PA 17129

RE: ***Accenture LLP: Pennsylvania Natural Gas Broker/Marketer License Application (Docket No. A-2025-3053039)***

Dear Mr. McCracken,

Per your request, an updated Pennsylvania Natural Gas Broker/Marketer License Application (Docket No. A-2025-3053039) for ACCENTURE LLP has been uploaded to the Pennsylvania PUC e-Filing portal.

The entire application has been updated from “Accenture LLP” to “ACCENTURE LLP”, where applicable.

Item No. 2(b) Deficiency:

It is our understanding that no updated response is required since unlike Illinois there is no Foreign Limited Liability Partnership form in Pennsylvania.

Item No. 5(b) Deficiency:

An updated response to the Item No. 5(b) deficiency has been set forth on the above-referenced, updated application. This response is more specific to the issues you highlighted and regulatory action.

Item No. 5(c) Deficiency:

An updated response to the Item No. 5(c) deficiency has been set forth on the above-referenced, updated application. This response is more specific to the issues you highlighted and regulatory action.

Item No. 7(a) Deficiency:

Today, a copy of the above-referenced, updated application is being sent to the respective NGDC’s along with a written request for a bonding letter.

Mr. Jeff McCracken

RE: Accenture LLP: Pennsylvania Natural Gas Broker/Marketer License Application (Docket No. A-2025-3053039)

March 11, 2025

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Item Nos. 11(a)/11(b) Deficiencies:

Both of the required Appendix A — Application Affidavit and the Appendix B — Operations Affidavit have been re-executed setting forth the updated name of the applicant as well as the U.S. State and U.S. County where the affidavits were executed.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Brian F. Ellis".

Brian F. Ellis
Attorney at Law
For the Firm

: BFE

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of _____, d/b/a _____, for approval to offer, render, furnish, or supply natural gas supply services as a(n) Broker/Marketer engaged in the business of supplying 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:

- 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.

- 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.

- 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.

- 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.

2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as (“d/b/a”)

Provide a copy of the Applicant’s filing with Pennsylvania’s Department of State Pursuant to 54 Pa. C.S. § 311, Form DSCB: 54-311.

or

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**

(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)

The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. § 412 relating to Department of State filing requirements.

or

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa.C.S. § 8621)
- foreign general or limited partnership (15 Pa.C.S. §§ 411 and 412)
- domestic limited liability partnership (15 Pa.C.S. §§ 8201 and 8221)
- foreign limited liability general partnership (15 Pa.C.S. §§ 411 and 412)
- foreign limited liability limited partnership (15 Pa.C.S. §§ 411 and 412)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant’s charter documentation.
- * If a corporate partner in the Applicant’s domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant’s Department of State filing pursuant to 15 Pa.C.S. §§ 411 and 412.

or

The Applicant is a:

- domestic corporation (15 Pa.C.S. § 1308)
- foreign corporation (15 Pa.C.S. §§ 411 and 412)
- domestic limited liability company (15 Pa.C.S. § 8821)
- foreign limited liability company (15 Pa.C.S. §§ 411 and 412)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above. See attached Exhibit A- Certificate of Good Standing for state of PA (State of Filing).
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. See attached Exhibit A- 1- Certificate of Good Standing for state of IL (State of Incorporation)
- Give name and address of officers. See attached Exhibit A-2 **CONFIDENTIAL**

3. **AFFILIATES AND PREDECESSORS**

(both in state and out of state)

- a. **AFFILIATES:** Give name and address of any affiliates currently doing business and state whether the affiliates are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

- b. **PREDECESSORS:** Identify any predecessors of the Applicant and provide the names under which the Applicant has operated, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

- c. **RELATED DOCKET NUMBERS:** Provide the Docket Numbers for any previous Pennsylvania PUC licenses for the Applicant, all affiliates, and any predecessors. If the Applicant does not have any related Docket Numbers, explicitly state so.

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)

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.

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 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.

5. COMPLIANCE

- a. **CRIMINAL/CIVIL PROCEEDINGS:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such.

- b. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. **Applicant should also include if it had a Pennsylvania PUC EGS or NGS license previously cancelled by the Commission.** If the Applicant has no actions or complaints to list, explicitly state such.
- c. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above. Additionally, provide details of any actions the applicant has undertaken that will prevent the items listed above from occurring if licensed in Pennsylvania.

6. PROOF OF SERVICE

***Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.
(Example Certificate of Service is attached at Appendix C)***

- a.) **STATUTORY AGENCIES:** Pursuant to Sections 1.57, 1.58, and 62.103(c) of the Commission's Regulations, 52 Pa. Code §§ 1.57, 1.58, and 62.103(c), provide proof of service of a signed and verified Application with attachments on the following:

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

**Office of the Attorney General
Bureau of Consumer Protection**
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

**Department of Revenue
Bureau of Compliance**
PO Box 281230
Harrisburg, PA 17128-1230

**Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement**
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

b.) NGDCs: Pursuant to Sections 1.57, 1.58, and 62.103(c) of the Commission’s Regulations, 52 Pa. Code §§ 1.57, 1.58, and 62.103(c), provide Proof of Service of the Application and attachments upon each of the Natural Gas Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission’s Regulations, 52 Pa. Code § 5.14. Contact information for each NGDC is as follows.

<p>Columbia Gas of PA, Inc. Transport Support Services 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.4980 e-mail: transportevaluations@nisource.com</p>	<p>National Fuel Gas Distribution Corp. Daniel Czechowicz, Director – Gas Supply Administration 6363 Main Street Williamsville, NY 14221 PH: 716.857.6917 e-mail: czechowiczd@natfuel.com</p>
<p>Peoples Natural Gas Company LLC – Peoples Natural Gas Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>Peoples Natural Gas Company LLC – Peoples Gas Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>
<p>PECO Suzette Adams. Sr. Manager, Gas Supply and Transportation 2301 Market Street, S-18 Philadelphia, PA 19103 PH: 215.841.6467 Email: Suzette.Adams@exeloncorp.com</p>	<p>Philadelphia Gas Works Ryan Reeves, Director Supply Transportation & Control 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.787.5103 email: pgwchoicesupply@pgworks.com</p>
<p>UGI Utilities, Inc. – Gas Division Sherry Epler 1 UGI Drive Denver, PA 17517 PH: 610.796.3447 Email: sepler@ugi.com</p>	<p>Valley Energy Inc. Ed Rogers 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: erogers@ctenterprises.org</p>

7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa.C.S. § 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require. The contact information is located in Section 6.b.
- b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:
- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies. See Exhibit B **CONFIDENTIAL**
 - Published Applicant or parent company financial and credit information (i.e. 10Q or 10K).(SEC/EDGAR web addresses are sufficient) See Exhibit C -1 **CONFIDENTIAL**
 - Applicant's accounting statements, including balance sheet and income statements for the past two years. See Exhibit C and C-1 **CONFIDENTIAL**
 - Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports. See Exhibit D, D-1. **CONFIDENTIAL**
 - A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee. Not Applicable.
 - Audited financial statements exhibiting accounts over a minimum two-year period. See Exhibit C and C-1 **CONFIDENTIAL**
 - Bank account statements (3-12 recent consecutive months), tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness. See attached Exhibit E and E-1 **CONFIDENTIAL**
- c. **SUPPLIER FUNDING METHOD:** If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.
- d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.

e. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application. Please find below Appendix D **CONFIDENTIAL**

All sections of the Tax Certification Statement must be completed. Submitting N/A on either the Sales Tax License Number or the Employer ID Number (items 7A and 7B) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Item 7A on the Tax Certification Statement is designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

8. **TECHNICAL FITNESS:**

To ensure that the present quality and availability of service provided by natural gas distribution companies does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

a. **EXPERIENCE, PLAN, STRUCTURE:** such information may include:

- Applicant's previous experience in the natural gas industry. See attached Exhibit F
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions. See Exhibit F-1 along with copy of state license where Accenture is acting as a supplier of natural gas services in other states or jurisdictions
- Type of customers and number of customers Applicant currently serves in other jurisdictions. See attached Exhibit F
- Staffing structure and numbers as well as employee training commitments. See attached Exhibit F
- Business plans for operations within the Commonwealth. See attached Exhibit F
- Any other information appropriate to ensure the technical capabilities of the Applicant. Not Applicable

b. **PROPOSED MARKETING METHOD** (*check all that apply*)

- Internal – Applicant will use its own internal resources/employees for marketing
- External NGS – Applicant will contract with a **PUC LICENSED NGS**
- Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
- External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or non-selling marketer**
- Other (Describe):

c. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience.

9. DISCLOSURE STATEMENT:

(Not applicable for an applicant applying for a license exclusively as a broker/marketer.)

DISCLOSURE STATEMENTS: If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **STANDARDS OF CONDUCT AND DISCLOSURE:** As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 62.114.

AGREED

- b. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission:
- Reports of Gross Receipts: Applicant shall file an annual report with the Commission on an annual basis no later than April 30th following the end of the calendar year per 52 Pa. Code § 62.110.

AGREED

- c. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa.C.S. § 2208(d) and 52 Pa. Code § 62.112(a). Transferee will be required to file the appropriate licensing application.

AGREED

- d. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling natural gas in the Commonwealth of PA, and a supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.

ACKNOWLEDGED

- e. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 62.105.

AGREED

- f. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa.C.S. §§ 4902, 4903, and 4904, relating to perjury and falsification in official matters.

AGREED

g. NOTIFICATION OF CHANGE: If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.

AGREED

h. CEASING OF OPERATIONS: Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.

AGREED

i. FILING FEE: The Applicant has enclosed or paid the required, non-refundable filing fee by **CERTIFIED CHECK OR MONEY ORDER** in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. **The Commission does not accept corporate or personal checks for filing fees.**

PAYMENT ENCLOSED

11. AFFIDAVITS

(All affidavits must be notarized before filing.)

a.) APPLICATION AFFIDAVIT: Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A. Please find below Appendix A

b.) OPERATIONS AFFIDAVIT: Provide an officially notarized affidavit stating that you will adhere to the Public Utility Code of Pennsylvania and applicable federal and state laws. An example copy of this Affidavit can be found at Appendix B. Please find below Appendix B

12. NEWSPAPER PUBLICATIONS

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

All Applicants MUST include a Commission issued Docket Number in their publications. Docket Numbers are issued to new applicants when an application packet is submitted to the PUC's Secretary's Bureau. **Newspaper publications published without a Commission issued Docket No. will be rejected.** For more information, see 52 Pa. Code § 62.107.

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.

The chart below dictates which newspapers are necessary for each NGDC. For example, an applicant that wants to operate in Peoples Natural Gas - Peoples Natural Gas Division would need to run ads in The Erie Times-News, the Pittsburgh Post-Gazette, and the Johnstown Tribune-Democrat. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and **must be supplied to the Commission before the applicant is licensed.**

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News or Philadelphia Inquirer	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Columbia Gas	X	X		X		X	X
National Fuel Gas	X			X			
PECO			X				
Peoples Natural Gas – Peoples Natural Gas Division	X			X			X
Peoples Natural Gas – Peoples Gas Division				X			
Philadelphia Gas Works			X				
UGI Utilities – Gas Div.	X	X	X	X	X	X	X
Valley Energy					X	X	
Entire Commonwealth	X	X	X	X	X	X	X

(Newspaper Publication Templates are provided at Appendices F and G)

13. SIGNATURE

Applicant: ACCENTURE LLP
 By: 
 Title: Managing Director, BPO Enterprise Energy Management

14. CHECKLIST

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections is complete.

Applicant: _____

Applicant's Use	Signature	PUC Secretary's Bureau Use
	Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)	
	Application Affidavit	
	Operations Affidavit	
	Tax Certification Statement	
	Commonwealth Department of State Verification	
	Certificate of Service	

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Colorado :

: ss.

County of Douglas :

Krisitn J. Ruehle, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Managing Director (Office of Affiant) of ACCENTURE LLP (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein ACCENTURE LLP has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa.C.S. § 2208 (c)(1) and 52 Pa. Code § 62.109(a).

That the Applicant herein ACCENTURE LLP has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein ACCENTURE LLP acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein ACCENTURE LLP acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

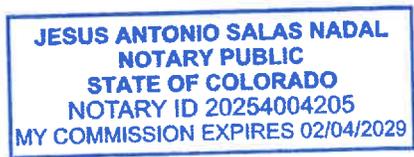
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

Krisitn Ruehle
Signature of Affiant

Sworn and subscribed before me this 07 day of March, 2025.

Jesus Salas
Signature of official administering oath

My commission expires 02/04/2029



Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of _____ :
: ss.
County of _____ :

Krisitn J. Ruehle, Affiant, being duly [sworn/affirmed] according to law,
deposes and says that:

[He/she is the Managing Director (Office of Affiant) of ACCENTURE LLP
(Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That ACCENTURE LLP, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That ACCENTURE LLP, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That ACCENTURE LLP, the Applicant herein, acknowledges that failure to comply with any provision of Chapter 22 of the Public Utility Code or the rules, regulations, orders or directives of the Department of Revenue or of the Commission, including, but not limited to, engaging in anticompetitive behavior, shall be cause for the Commission to revoke the Applicant's license. See 66 Pa.C.S. § 2208(c)(2). The Applicant acknowledges that it shall report to the Commission its jurisdictional natural gas sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa.C.S. § 506 (relating to the inspection of facilities and records).

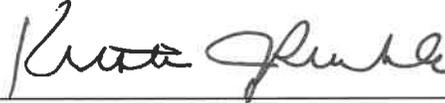
Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That ACCENTURE LLP, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa.C.S. § 506 and the standards and billing practices of 52 Pa. Code Chapter 56.

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



Signature of Affiant

Sworn and subscribed before me this 07 day of March, 2025.



Signature of official administering oath

My commission expires 02/04/2029.



Appendix C

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

CERTIFICATE OF SERVICE TEMPLATE

On this the 6TH day of MARCH 2025 I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as a Natural Gas Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom or a USB flash drive, upon the following:

Office of Consumer Advocate

5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

**Office of the Attorney General
Bureau of Consumer Protection**

Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of Small Business Advocate

Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

**Department of Revenue
Bureau of Compliance**

PO Box 281230
Harrisburg, PA 17128-1230

**Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement**

Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Columbia Gas of PA, Inc.

Transport Support Services
290 W. Nationwide Blvd.
Columbus, OH 43215
PH: 614.460.4980
e-mail: transportevaluations@nisource.com

National Fuel Gas Distribution Corp.

Daniel Czechowicz, Director – Gas Supply Administration
6363 Main Street
Williamsville, NY 14221
PH: 716.857.6917
e-mail: czechowiczd@natfuel.com

PECO

Suzette Adams, Sr. Manager, Gas Supply and
Transportation
2301 Market Street, S-18
Philadelphia, PA 19103
PH: 215.841.6467
Email: Suzette.Adams@exeloncorp.com

**Peoples Natural Gas Company LLC - Peoples Natural Gas
Division**

Carol Scanlon
375 North Shore Drive
Pittsburgh, PA 15212
PH: 412.208.6931
e-mail: Carol.Scanlon@peoples-gas.com

**Peoples Natural Gas Company LLC - Peoples Gas
Division**

Carol Scanlon
375 North Shore Drive
Pittsburgh, PA 15212
PH: 412.208.6931
e-mail: Carol.Scanlon@peoples-gas.com

Philadelphia Gas Works

Ryan Reeves, Director Supply Transportation & Control
800 West Montgomery Avenue
Philadelphia, PA 19122
PH: 215.787.5103
email: pgwchoicesupply@pgworks.com

UGI Utilities, Inc. – Gas Division

Sherry Epler
1 UGI Drive
Denver, PA 17517
PH: 610.796.3447
Email: sepler@ugi.com

Valley Energy Inc.

Ed Rogers
523 South Keystone Avenue
Sayre, PA 18840-0340
PH: 570.888-9664
email: erogers@ctenterprises.org



Kristin.J.Ruehle, ACCENTURE LLP

Appendix F

NEWSPAPER PUBLICATION TEMPLATE FOR NGS ONLY

(Applicant must substitute appropriately for all bracketed areas)

(Applicant should choose 1 of the service options corresponding with Section 4.b of the application)

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

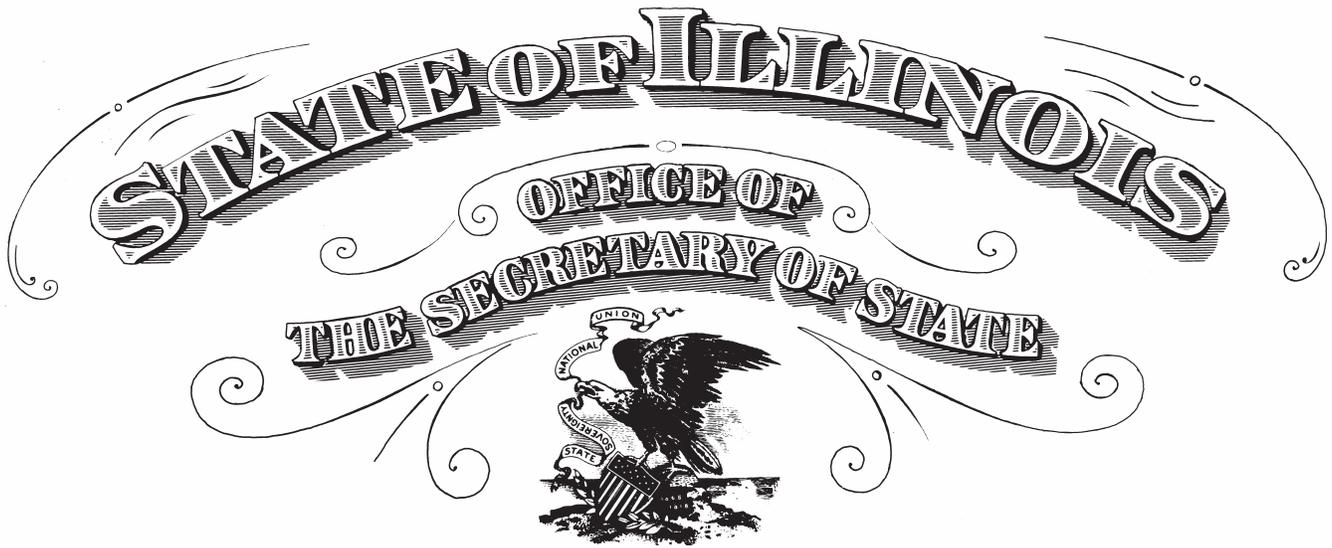
Application of **Accenture LLP** for Approval to Offer, Render, Furnish or Supply Natural Gas Supply Services to the public in The Commonwealth of Pennsylvania at Docket No. [A-2025-3053039].

Accenture LLP has filed an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a **broker/ marketer engaged in the business of supplying natural gas services**. **Accenture LLP** proposes to sell natural gas and related services in **the entire Commonwealth of PA** under the provisions of the Natural Gas Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Accenture LLP may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. Please include the Docket No. listed above on the protest.

Additionally, please send copies of any protest to **Accenture LLP's** attorney at the address listed below.

**ATTN. BRIAN ELLIS
THE ELLIS LAW FIRM
Accenture LLP
1300 NW Briarcliff Parkway, Suite 120
Kansas City, MO 64150
(816) 472-1515-phone
(816) 472-1516 Facsimile**



To all to whom these Presents Shall Come, Greeting:

I, Alexi Giannoulas, Secretary of State of the State of Illinois, do hereby certify that I am the keeper of the records of the Department of Business Services. I certify that

ACCENTURE LLP, HAVING FILED A STATEMENT OF QUALIFICATION IN THE STATE OF ILLINOIS ON OCTOBER 23, 2001, APPEARS TO HAVE COMPLIED WITH ALL PROVISIONS OF THE UNIFORM PARTNERSHIP ACT (1997) OF THIS STATE, AND AS OF THIS DATE IS IN GOOD STANDING AS A DOMESTIC LIMITED LIABILITY PARTNERSHIP IN THE STATE OF ILLINOIS, HAVING FULFILLED ALL REQUIREMENTS OF SAID ACT.

In Testimony Whereof, I hereto set my hand and cause to be affixed the Great Seal of the State of Illinois, this 21ST day of FEBRUARY A.D. 2024 .



Pennsylvania Department of State
Bureau of Corporations and Charitable Organizations
PO Box 8722 | Harrisburg, PA 17105-8722
T: 717-787-1057
dos.pa.gov/BusinessCharities

Regarding: ACCENTURE LLP
Request Type: Certificate of Registration
Request No.: 030912020
Receipt No.: 921427
Filing Type: Foreign Limited Partnership
Filing Subtype: Limited Liability Limited Partnership
Initial Filing Date: October 26, 2000
Status: Active

Issuance Date: February 22, 2024
File No: 0002969907

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

I DO HEREBY CERTIFY THAT

ACCENTURE LLP

is a foreign association duly registered to do business in this Commonwealth as of the issuance date herein.

I DO FURTHER CERTIFY THAT this Certificate of Registration shall not imply that all fees, taxes and penalties owed to the Commonwealth of Pennsylvania are paid.



IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the seal of my office to be affixed, the day and year above written.

A handwritten signature in black ink, appearing to read "Albert Schmidt".

Albert Schmidt
Secretary of the Commonwealth

Verify this certificate online at www.file.dos.pa.gov



Accenture LLP

500 W. Madison Street, 21st Floor,
Chicago, IL 60661

Exhibit F- TECHNICAL FITNESS: EXPERIENCE, PLAN, STRUCTURE

Applicant's previous experience in the natural gas industry:

Applicant is a nationwide provider of outsourcing, technology and management consulting services. Applicant is an experienced energy services company that has concentrated on delivering supply side savings to its clients as part of set of enterprise energy management services. It has offered utility rate tariff analysis services since 1986, and has been assisting its clients in analyzing deregulated supply opportunities versus price-to-compare or default service since 2000. Applicant provides services to commercial and industrial clients (not residential) helping our clients manage their supply side utility expenditures. In deregulated markets such as Ohio, Applicant assists clients in procuring low cost supply when it is competitive with price to-compare rates.

Type of customers and number of customers Applicant currently serves in other jurisdictions:

Applicant currently serves approximately 30 clients with sites across jurisdictions in the United States. These clients are large commercial and industrial clients representing a wide variety of industries.

Staffing structure and numbers as well as employee training commitments:

Applicant's staff consists of approximately ten employees with deep expertise in energy markets in North America.

Business plans for operations within the Commonwealth:

Applicant will represent a roster of large commercial and industrial clients in issuing competitive natural gas procurement events in Pennsylvania.

Accenture LLP
500 W. Madison Street, 21st Floor, Chicago, IL 60661
www.accenture.com

Exhibit F-1
Operations in other States

Applicant is registered as a supplier of natural gas services in the following states:

State	Status	Date Issued
District of Columbia	Active	9/23/2014
Illinois	Active	6/26/2014
Maine	Active	5/22/2014
Maryland	Active	9/10/2024
Massachusetts	Active	8/27/2014
New Hampshire	Active	5/13/2014
New Jersey	Active	1/21/2015
Ohio	Active	7/5/2014
Rhode Island	Active	6/30/2014

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1333 H STREET N.W., 2ND FLOOR, WEST TOWER
WASHINGTON, D.C. 20005

ORDER

September 23, 2014

FORMAL CASE NO. GA 2014-09, IN THE MATTER OF THE APPLICATION OF ACCENTURE LLP FOR A NATURAL GAS SUPPLIER LICENSE; and

FORMAL CASE NO. EA 2014-14, IN THE MATTER OF THE APPLICATION OF ACCENTURE LLP FOR AN ELECTRICITY SUPPLIER LICENSE, Order No. 17641

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia (“Commission”) grants licenses to Accenture LLP (“Accenture” or “Applicant”) to function as an electricity and natural gas supplier in the District of Columbia.¹ The licenses for Accenture LLP are effective upon issuance of this Order.

II. BACKGROUND

2. On June 26 and July 21, 2014, Accenture filed its license applications.² Specifically, Accenture indicates that it intends to operate as a broker of electricity pursuant to Section 34-1505 of the “Retail Electric Competition and Consumer Protection Act of 1999” (“Act”)³ and as a broker of natural gas pursuant to the Commission’s licensing requirements as set forth in GT 96-3, Order Nos. 12709 and 12903.⁴ In both filings, the Applicant represents that it intends to serve commercial and industrial customers in the District of Columbia. Accenture provided the following information in compliance with the Commission’s licensing requirements:⁵

¹ D.C. Code § 34-1501(17) (2001) defines, in part, an electricity supplier as “a person, including an aggregator, broker, or marketer, who generates electricity; sells electricity; or purchases, brokers, arranges or markets electricity for sale to customers.” D.C. Code § 34-1671.02(12) (2001) defines a natural gas supplier as “a person including an aggregator, broker, or marketer, who sell natural gas or purchases, brokers, arranges or, markets natural gas for sale to customers.”

² *Formal Case No. EA 2014-14, In the Matter of the Application of Accenture LLP for an Electricity Supplier License* (“*Formal Case No. EA 2014-14*”), Application of Accenture LLP filed June 26, 2014 and *Formal Case No. GA 2014-09, In the Matter of the Application of Accenture LLP for a Natural Gas Supplier License* (“*Formal Case No. GA 2014-09*”), Application of Accenture LLP filed July 21, 2014.

³ D.C. Code § 34-1505; *see generally* D.C. Code §§ 34-1501-1520.

⁴ GT 96-3, Order No. 12709, as revised by Order No. 12903, at Attachment C.

- a) Proof of technical and managerial competence;
- b) Affidavits certifying compliance with applicable Federal and District of Columbia environmental laws and regulations;
- c) Proof of financial integrity to include financial statements;
- d) Proof that Accenture has registered with the Department of Consumer and Regulatory Affairs to do business in the District of Columbia;
- e) Affidavits certifying that Accenture is subject to all applicable taxes;
- f) Affidavits certifying that Accenture will comply with all the requirements of all orders and regulations of the Commission; and
- g) Applicant's website address: <http://www.procurianenergy.com>.

Accenture filed supplemental information on August 8 and September 19, 2014.⁶

III. DISCUSSION

3. Our review of the information contained in Accenture's applications, demonstrate that it has met all the prescribed licensing requirements and that the Applicant has the ability and the financial integrity to serve electricity and natural gas customers in the District of Columbia. The Commission also finds that granting Accenture's applications will serve the public interest by fostering competition in the District's energy market. Accordingly, Accenture's applications are approved.

⁵ *Formal Case No. 945, In the Matter of the Investigation into Electric Service Market Competition and Regulatory Practices, Order No. 11796 at Attachment C; and GT 96-3, Order No. 12709, as revised by Order No. 12903, at Attachment C.*

⁶ *Formal Case No. EA 2014-14 and GA 2014-09, Accenture filed supplemental information on August 8 and September 19, 2014.*

THEREFORE, IT IS ORDERED THAT:

4. The applications of Accenture LLP for licenses to conduct business in the District of Columbia as a broker of electricity and natural gas are hereby **GRANTED**. The licenses for Accenture LLP are effective upon issuance of this Order.

A TRUE COPY:

BY DIRECTION OF THE COMMISSION:

A handwritten signature in black ink, reading "Brinda Westbrook-Sedgwick". The signature is written in a cursive style with a large initial 'B'.

CHIEF CLERK:

**BRINDA WESTBROOK-SEDGWICK
COMMISSION SECRETARY**

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Accenture LLP	:	
	:	
Application for Licensure of	:	
Agents, Brokers and Consultants	:	
under Section 16-115C of the	:	
Public Utilities Act and Petition to	:	14-0303
Cancel Agents, Brokers and	:	
Consultants License of Utilities	:	
Analyses, Inc. to be effective upon	:	
the Licensure of Accenture LLP.	:	

ORDER

By the Commission:

I. INTRODUCTION

On April 11, 2014, Accenture LLP (“Applicant”) filed a verified application with the Illinois Commerce Commission (“Commission”) requesting a certificate of service authority to operate as an agent, broker, or consultant (“ABC”) in Illinois pursuant to Section 16-115C of the Public Utilities Act (“Act”), 220 ILCS 5/1-101 et seq., and 83 Ill. Adm. Code 454, "Licensure of Retail Electric Agents, Brokers and Consultants" (“Part 454”). Applicant requests authority to offer services as an ABC for the procurement or sale of retail electricity supply for third parties in the State of Illinois.

Applicant also filed a verified petition requesting an order cancelling its subsidiary Utilities Analyses, Inc.’s (“UAI”) Certificate of Service Authority authorizing it to operate as an ABC in Illinois. UAI received its Certificate of Service Authority on July 27, 2011 in Docket No. 11-0428. In support of this petition, Applicant states that UAI was acquired by Procurian, Inc. (“Procurian”) in 2012 and that in December 2013 Applicant acquired Procurian thus making UAI a wholly-owned subsidiary of Applicant. Following the acquisition of Procurian, Applicant discovered that UAI had failed to file its 2012 Annual Recertification Compliance Report (“454 Report”) with the Chief Clerk’s Office of the Commission. As well, UAI’s authority to transact business in Illinois had lapsed in September 2012. Applicant is currently integrating UAI’s operations into Applicant’s procurement line of business and will take over all of UAI’s brokering contracts and obligations in Illinois.

Upon review of the application, Staff of the Commission (“Staff”) requested additional information and clarification of certain matters. On June 6, 2014, Applicant filed a Supplement to his Application. Since all of the information to grant the requested relief was contained in the application, the Hearing was waived.

II. REQUIREMENTS FOR ALL APPLICANTS UNDER SECTION 16-115C OF THE ACT

Applicant is a business organized under the laws of and authorized to transact business in the State of Illinois. Applicant has certified that it will comply with all applicable regulations; that it will comply with informational and reporting requirements established by Commission rule; that it will comply with informational and reporting requirements pursuant to Section 16-115C of the Act; and that it will comply with all other applicable laws, regulations, terms, and conditions required to the extent they have application to the services being offered by an ABC. Applicant has agreed to ensure that any person who acts on its behalf will comply with all applicable sections of Part 454. Applicant agrees that it will remain in compliance with the provisions of the Act and Part 454, and will ensure that authorizations received from customers, and all other applicable records are retained for a period of not less than three calendar years after the calendar year in which they were created. Applicant has agreed to adopt and follow rules and procedures to preserve the confidentiality of its customers' data. The Applicant has also attested that no complaints have been filed against it for its provision of services in the electric or gas industry in the jurisdictions where it provides or is seeking to provide services.

III. FINANCIAL, TECHNICAL, AND MANAGERIAL REQUIREMENTS OF SECTION 16-115C

Applicant is required by Section 454.60 to demonstrate that it meets the managerial qualifications necessary to provide services as an ABC. Applicant must further provide an organizational chart that indicates the position of persons which satisfy the managerial qualification. Applicant has demonstrated that it meets the managerial qualifications set forth in Section 454.60 through Attachment A. Attachment B contains a corporate organizational chart and identifies the occupational background information of the persons being used to meet the requirements of Section 454.60(a). Attachment A contains occupational background information of the persons being used to meet the requirements of Section 454.60(a).

Applicant is required by Section 454.70 to demonstrate that it meets the technical qualifications necessary to provide services as an ABC. Applicant has demonstrated that it meets the technical qualifications set forth in Section 454.70 with the information provided in Attachment A. Attachment A contains occupational background information on the person or persons being used to meet the requirements of Section 454.70(a).

Pursuant to the requirements of Section 454.80 of Part 454, Applicant provided a surety bond in the amount of \$5,000 issued by a qualifying surety authorized to transact business in Illinois. Applicant further agrees to comply with the Code of Conduct for ABCs contained in Section 454.90.

IV. COMMISSION CONCLUSION AND CERTIFICATE OF SERVICE AUTHORITY

The Commission has reviewed the application and attachments along with the supplementary information provided by Applicant regarding the technical, managerial, and financial requirements and all other requirements of the Act and Part 454 and finds that the Applicant sufficiently demonstrates compliance with the requirements. The Commission concludes, therefore, that Applicant's request for a certificate of service authority to operate as an ABC in Illinois should be granted and should include the following authority:

CERTIFICATE OF SERVICE AUTHORITY

IT IS CERTIFIED that Accenture LLP is granted service authority to operate as an agent, broker, or consultant for the procurement or sale of retail electricity supply for third parties in the State of Illinois.

A review of Commission records reveals that UAI did not file its 2012 and 2013 Part 454 reports with the Commission's Chief Clerk's Office. The Commission is willing to grant Applicant's requested cancellation of its subsidiary UAI's ABC certificate, but is troubled by the missing Part 454 report. Applicant must file UAI's missing 2012 and 2013 Part 454 reports within fourteen calendar days of entry of this Order or it may face a disciplinary proceeding under the Act. UAI's report for 2013 should indicate when it ceased operating. The Commission concludes that Applicant's subsidiary UAI's Certificate of Service Authority should be cancelled subject to this reporting requirement.

V. FINDINGS AND ORDERING PARAGRAPHS

The Commission, having reviewed the entire record, is of the opinion and finds that:

- (1) Accenture LLP, a business organized under as well as authorized to transact business in Illinois, seeks a certificate of service authority to operate as an ABC under Section 16-115C of the Act;
- (2) the Commission has jurisdiction over the party hereto and the subject matter hereof;
- (3) the recitals of fact and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) Accenture LLP has demonstrated that it possesses sufficient financial, managerial, and technical resources and abilities to provide services as an ABC for the procurement or sale of retail electricity supply to third parties in the State of Illinois;

- (5) Accenture LLP has complied with Section 16-115C of the Act and Part 454;
- (6) Accenture LLP should be granted a certificate of service authority to operate as an ABC as specified in this Order;
- (7) the Certificate of Service Authority granted to Utilities Analyses, Inc. should be permanently cancelled; and
- (8) Accenture LLP should file with the Chief Clerk its subsidiary Utilities Analyses, Inc.'s annual Part 454 reports for 2012 and 2013 within fourteen calendar days of the entry of this Order; failure to do so may subject Accenture LLP to a disciplinary proceeding under the Act.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that Accenture LLP is hereby granted a Certificate of Service Authority authorizing it to operate as an agent, broker, or consultant; said Certificate of Service Authority shall read as that set forth in Section IV of this Order.

IT IS FURTHER ORDERED by the Illinois Commerce Commission that the Certificate of Service Authority granted to Utilities Analyses, Inc. in Docket No. 11-0428 is hereby cancelled.

IT IS FURTHER ORDERED that the Illinois Commerce Commission retains jurisdiction over this matter to ensure compliance with Finding 8.

IT IS FURTHER ORDERED that Accenture LLP shall comply with all applicable Commission rules and orders now and as hereafter amended.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 26th day of June, 2014.

(SIGNED) DOUGLAS P. SCOTT

Chairman

From: [Smith, Lucretia](#)
To: [Brian Ellis](#)
Cc: [Allison Gibson](#)
Subject: RE: Accenture LLP: Notice of Change of Authorized Representative/Signatory and Change in Primary and Mailing Address
Date: Friday, September 2, 2022 2:57:53 PM

And just to follow up on the gas broker, since the Commission only maintains a list for gas brokers and does not issue a license, there is no docket to file this information in and an email contact is sufficient for the change in address.

Lucretia Smith

From: Brian Ellis <bfe@ellislaw-kc.com>
Sent: Friday, September 02, 2022 3:38 PM
To: Smith, Lucretia <Lucretia.Smith@maine.gov>
Cc: Allison Gibson <agibson@ellislaw-kc.com>
Subject: Accenture LLP: Notice of Change of Authorized Representative/Signatory and Change in Primary and Mailing Address

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Smith,

Please see attached and process accordingly.

Brian F. Ellis
Attorney at Law
The Ellis Law Firm, LLC
www.ellislaw-kc.com
(816) 472-1515
(816) 472-1516 Facsimile

The information in this entire e-mail and any attachments may contain legally privileged, proprietary and confidential information that is intended for a particular recipient. If you are not the intended recipient you are hereby notified that any disclosure, copying, distribution, retention or use of the contents of this e-mail information is prohibited. If you have received this e-mail in error, please immediately notify us by telephone or by return e-mail, and delete the e-mail. Thank you for your courtesies with regard to this matter.

The Missouri Bar and Missouri Supreme Court require Missouri attorneys to notify e-mail recipients that e-mail is not a secure method of communication, that it may be copied and held by any computer through which it passes, and persons not participating in the communication may intercept the communication. Should you wish to discontinue this method of communication, please so advise, and no further e-mail communication will be sent to you. Thank you.

Major Energy Services LLC 12140 Wickchester Ln., Suite 100 Houston, TX 77079	Customer Care Phone: 888-625-6760 email: customer-care@majorenergy.com
Metromedia Energy, Inc. 2000 West Park Drive Westborough, MA 01581	Scott Werman Phone: 508-329-0186 Fax: 508.986.7194 email: swerman@mmenergy.com
People's Power & Gas 10150 Highland Manor Drive Suite 200 Tampa, FL 33610	Dave O. Pearsall CEO Phone: 855-857-6937 Fax: 855-857-1188 email: dpearsall@peoplespower.com
Shell Energy North America (US), L.P. 1000 Main Street Level 12 Houston, Texas 77002	Roberta Orris Commercial/Industrial Sales Representative Phone: 508-321-1537 Fax: 713-265-1715 email: roberta.orris@shell.com
Shell Energy North America (US), L.P. 909 Fannin Street Plaza Level 1 Houston, Texas 77010	Amy Gold General Manager, Regulatory Affairs Phone: 713-230-7812 Fax: 713-265-4812 email: amy.gold@shell.com
Spark Energy Gas, LP 12140 Wickchester Ln., Suite 100 Houston, TX 77079	Customer Service Phone: 877-547-7275 email: customer-care@sparkenergy.com
Sprague Energy Solutions Inc. 185 International Drive Portsmouth, NH 03801	Mark Roberts Phone: 603-766-7412 Fax: 603-430-5324 email: mroberts@spragueenergy.com
Sprague Operating Resources, LLC fka Sprague Energy Corp. 185 International Drive Portsmouth, NH 03801	Bob Poston or Pricing Desk Phone: 201-633-8277 or 603-766-7486 Fax: (201) 221-8331 email: bposton@spragueenergy.com or pricing_desk@spragueenergy.com
Tenaska Power Services Co. 1701 E. Lamar Blvd. Suite 100 Arlington, Texas 76006	James Lunday Controller Phone: (817) 303-1871 Fax: (817) 462-1038 email: AccountingUsers@tnsk.com
TM Energy Atlantica Inc. 1521 Grafton Street Suite 203 Halifax, Nova Scotia B3J 2B9	Nadja Zinck Data Analyst Phone: 9024226331 Fax: email: nzinck@energyatlantica.com

Brokers

Organization	Contact
Utiliz Services LLC 7880 San Felipe St. Ste 210 Houston, Texas. 77063	C. Thomas Schmidt CEO 713-568-4898 email: tom@schmidtfirm.com
E-3 Energy Advisors, LLC PO BOX 90833 ROCHESTER, New York. 14609	Peter Schmitt President Phone: 585-208-2448 email: pschmitt@e3eadv.com
ABC Energy Consulting, LLC c/o lynn cayford 54 Roberta St. Farmingdale, Maine 04344	Lynn Cayford President Phone: 207 441 6396 Fax: email: cayford745@roadrunner.com
Accenture LLP 500 W. Madison Street 20th Floor Chicago, IL 60661	Kristen Ruehle Global Business Leader for Procurement Phone: (720) 244-6720 email: kristen.j.ruehle@accenture.com

COMMISSIONERS

W. KEVIN HUGHES
CHAIRMAN

HAROLD D. WILLIAMS
LAWRENCE BRENNER
KELLY SPEAKES-BACKMAN
ANNE E. HOSKINS

STATE OF MARYLAND



PUBLIC SERVICE COMMISSION

#10, 9/10/14 AM; ML#s 154968 and 155828
License Reference No.: IR-3325

September 10, 2014

Stephen D. Spears
Senior Offerings Counsel
Accenture LLP
161 North Clark Street
Chicago, IL 60601-3200

Dear Mr. Spears:

On May 12, 2014, Accenture LLP ("Company") filed an Application for a License to Supply to Supply Natural Gas or Natural Gas Supply Services in Maryland under COMAR 20.54. The Company proposes to provide natural gas supplier broker services in Maryland for commercial and industrial customers as described in the application. Additional information was filed on June 9, 2014.

After considering this matter at the September 10, 2014 Administrative Meeting, the Commission granted the Company a license to supply natural gas or natural gas supply broker services in Maryland (License Reference Number IR-3325). The license granted by the Commission under this Letter Order is limited solely to natural gas supplier broker services for customer classes and service territories as recommended by Staff. Additionally, the Company is directed to provide marketing and training materials specific to its Maryland operations to the Commission Staff 30 days prior to commencing operations in Maryland.

Finally, the Company is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People's Counsel.

By Direction of the Commission,

/s/ David J. Collins

David J. Collins
Executive Secretary

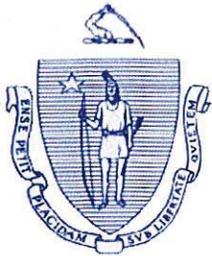
DJC/st

cc: Phil VanderHeyden, Electricity Division
Obi Linton, Director, External Relations

WILLIAM DONALD SCHAEFER TOWER • 6 ST. PAUL STREET • BALTIMORE, MARYLAND 21202-6806

410-767-8000 • Toll Free: 1-800-492-0474 • FAX: 410-333-6495

MDRS: 1-800-735-2258 (TTY/Voice) • Website: www.psc.state.md.us



THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

DEVAL L. PATRICK
GOVERNOR

ONE SOUTH STATION
BOSTON, MA 02110
(617) 305-3500

ANN G. BERWICK
CHAIR

MAEVE VALLELY BARTLETT
SECRETARY OF ENERGY
AND ENVIRONMENTAL AFFAIRS

JOLETTE A. WESTBROOK
COMMISSIONER

KATE McKEEVER
COMMISSIONER

August 27, 2014

Chad Gottesman, Managing Director
Accenture, LLP
161 North Clark Street
Chicago, IL 60601

Mr. Gottesman,

The Department of Public Utilities has reviewed Accenture, LLP ("Accenture") application for a Gas Retail Agent license to serve commercial and industrial customers in the Commonwealth of Massachusetts. I am pleased to inform you that the application has been approved. Accenture's license number is RA- 117.

As a condition of maintaining its license, Accenture must file updated information within 30 days of any material change in the information required by 220 C.M.R. § 14.04(2), and must comply with all relevant requirements of G.L. c. 164 and the regulations thereunder, including 220 C.M.R. §§ 12.00, 14.00 *et seq.* If you decide to request renewal of Accenture's license next year, please submit a renewal application that includes audited financial statements, at least 30 days prior to the expiration of this license.



Sincerely,


Mark D. Marini, Secretary



CHAIRMAN
Amy L. Ignatius

COMMISSIONERS
Robert R. Scott
Martin P. Honigberg

EXECUTIVE DIRECTOR
Debra A. Howland

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website:
www.puc.nh.gov

PUBLIC UTILITIES COMMISSION

21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

May 14, 2014

Stephen D. Spears, Senior Offerings Counsel
Accenture LLP
161 North Clark Street
Chicago, IL 60601-3200

Re: DM 14-115, Accenture LLP
Application to Register as Provider of Natural Gas Aggregation Service

Dear Mr. Spears:

On April 29, 2014, Accenture LLP filed an application with the Commission to register as a provider of natural gas aggregation service. Staff reviewed the application and determined that it is complete.

The Commission approves your application effective May 13, 2014. The registration is for a term of 2 years and expires at the end of business on May 12, 2016. Pursuant to N.H. Code Admin. Rules Puc 3003.02(a), you must submit your next renewal application at least 60 days prior to the expiration of the registration approved here, on or before March 11, 2016.

Please be aware that registered providers of natural gas aggregation service are subject to specific requirements contained in N.H. Code Admin. Rules Puc 3000 – Competitive Natural Gas Supplier and Aggregator Rules. These rules are available at: <http://www.puc.nh.gov/Regulatory/Rules/PUC3000.pdf>.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra A. Howland".

Debra A. Howland
Executive Director

cc: Service List
Docket File

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, P.O. Box 350, Trenton, New Jersey 08625-0350

HEREBY REGISTERS

Accenture LLP

161 North Clark Street
23rd Floor
Chicago, Illinois 60601

To conduct business in the State of New Jersey as an

Energy Agent



Kenneth J. Sheehan
Secretary to the Board

Registration No. EA-0308
Effective Date: January 21, 2015
Expiration Date: January 20, 2016



The Public Utilities Commission of Ohio

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate

Issued pursuant to Case Number(s):

14-1004-GA-AGG

is

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:

14-364G(1)

Granted to:

Accenture LLP

Whose office or principal place of business is located at:

450 Old Peachtree Road NW, Suite 103, Suwanee, GA 30024

And is hereby certified to provide:

Retail Natural Gas Aggregator/Broker Services

within the state of Ohio, for a two-year period.

Certification Effective:

July 5, 2014 through July 5, 2016

The certification of Ohio competitive retail natural gas aggregators/brokers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

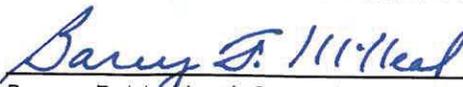
This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio

Dated: **July 3, 2014**

By Order of
The Public Utilities Commission of Ohio



Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Felecia D. Burdett, Acting Secretary

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: APPLICATION FOR AUTHORITY AS GAS : DOCKET NO. 2379(F3)
MARKETER FILED BY ACCENTURE, LLP :

ORDER

WHEREAS, On June 2, 2014, Accenture LLP (Company) filed with the Rhode Island Public Utilities Commission (PUC) an application for authority to operate as a gas marketer in accordance with the entry requirements set forth in the PUC Rules and Regulations for Utility Interaction with Gas Marketers (Regulations); and

WHEREAS, On June 26, 2014, the Division of Public Utilities and Carriers filed a memorandum indicating that it had reviewed the Company's application, found it to comport with the entry requirements established by the regulations and recommended approval of the application; and

WHEREAS, The PUC finds that the Company's application is proper, meets the regulatory requirements of the Regulations and hereby approve the Company's application.

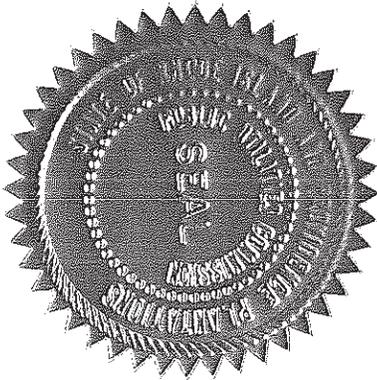
Accordingly, it is

(21531) ORDERED:

- 1) The application for authority to operate as a gas marketer filed by Accenture LLP is approved.
- 2) That the Company shall comply with the standards of conduct and all other regulatory requirements.

EFFECTIVE AT WARWICK, RHODE ISLAND ON JUNE 30, 2014,
PURSUANT TO OPEN MEETING DECISION. WRITTEN ORDER ISSUED ON
JULY 31, 2014.

PUBLIC UTILITIES COMMISSION



Margaret E. Curran

Margaret E. Curran, Chairperson

Paul J. Roberti

Paul J. Roberti, Commissioner

Herbert F. DeSimone, Jr.

Herbert F. DeSimone, Jr., Commissioner



Kristin Ruehle

GLOBAL SOURCING & PROCUREMENT BUSINESS LEAD

Background

Kristin leads the Procurement BPS offering globally for Accenture Operations. Kristin has more than 20 years experience in Procurement and F&A and has more than 17 years of operations experience. In this role, Kristin helps guide the development and enhancement of Accenture's end-to-end Procurement BPS capabilities across the globe, including sourcing and category management, and procure to pay. Most recently this includes envisioning the next generation digital procurement.

Relevant Experience

Kristin is passionate about helping companies architect their own procurement transformation. Prior to her role as the offering lead, she led large source-to-pay transformation programs in the areas of procurement, accounts payable, and travel and expense across a variety of industries including resources, retail, pharmaceuticals, public sector, and financial services.

- PTP Transformation Lead for a large bank's PTP transformation, responsible for the global design, build, and test of a new invoice matching and reconciliation solution and deployment of the solution to the Accenture Service Delivery Team servicing clients in four Delivery Centers and for client employees in seven countries.
- North American PTP Operations and Deployment Lead responsible for the day-to-day service delivery of the Purchasing, Accounts Payable, and T&E processing teams located Accenture's Delivery Centers.
- Functional Team Lead for the eProcurement launch for a public sector client, responsible for leading Accenture team members through the analysis, design, and testing phase of the implementation of the Ariba Suite including Buyer, Contracts, Invoice, Sourcing, and Analysis.

Education

- BA, Indiana University

Expertise

- Procurement
- Purchasing and AP Operations Management
- Account Delivery Management
- Business Process Outsourcing
- Business Process Design
- Business Transformation Design and Execution
- Collaboration and Innovation
- Business Functional Architect

Industries

- Consumer Goods
- Resources
- Retail
- Pharmaceuticals
- Public Sector
- Financial Services