

VIA PA PUC E-FILING

September 16, 2025

Pennsylvania Public Utility Commission  
Secretary's Bureau  
400 North Street, Keystone Building  
Harrisburg, PA 17120

In re: OnPoint CX Solutions, LLC's Application for License as a Natural Gas Broker

To whom it may concern,

Please accept OnPoint CX Solutions, LLC's application for parties wishing to offer, render, furnish, or supply natural gas supply services to the public in Pennsylvania as a broker/marketer.

The Applicant will be also filing confidential documents separately with the Commission via overnight delivery service which will include (i) the financial documents mentioned in Exhibit 5 and (ii) the Applicants Tax Certification Statement.

Please note, the Applicant currently has an Electric Generation Supplier (EGS) license application pending before the Pennsylvania Public Utility Commission at Docket No. A-2025-3056823.

Finally, the Applicant fully intends to comply with the Publication Service requirement and will do so promptly upon receiving the docket number from the Commission.

Should you have any questions, please feel free to contact me at (702) 342-0456 or via email at [compliance@onpointcxsolutions.com](mailto:compliance@onpointcxsolutions.com).

Sincerely,

*Desiree Arnold*

Desiree Arnold  
Owner

2925 N Green Valley Pkwy, Ste C  
Henderson, NV 89014

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of ONPOINT CX SOLUTIONS LLC, for approval to offer, render, furnish, or supply natural gas supply services as a Broker/Marketer 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:

ONPOINT CX SOLUTIONS LLC  
2925 N Green Valley Pkwy, Ste C  
Henderson, NV 89014  
Phone: 702-342-0456  
onpointcxsolutions.com

- 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.

REPUBLIC REGISTERED AGENT LLC  
239 Fourth Ave, Ste 1401  
Pittsburgh PA 15222  
Phone: (888) 462-3453  
Fax: None

- 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.

Desiree Arnold, Owner  
2925 N Green Valley Pkwy, Ste C  
Henderson, NV 89014  
Phone: 702-342-0456  
Fax: N/A  
Email: Compliance@onpointcxsolutions.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.

The applicant is 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.

Desiree Arnold, Owner  
2925 N Green Valley Pkwy, Ste C  
Henderson, NV 89014  
Phone: 702-342-0456  
Fax: N/A  
Email: [Compliance@onpointcxsolutions.com](mailto:Compliance@onpointcxsolutions.com)

Krista Roe, Account Manager  
2925 N Green Valley Pkwy, Ste C  
Henderson, NV 89014  
Phone: 702-342-0456  
Fax: N/A  
Email: [Partnerships@onpointcxsolutions.com](mailto:Partnerships@onpointcxsolutions.com)

## 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**

**X** 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)
- X** 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 EXHIBIT 1

- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.

The Applicant is formed under the laws of the State of Delaware. SEE EXHIBIT 2

- Give name and address of officers.

Desiree Arnold, Owner  
 2925 N Green Valley Pkwy, Ste C  
 Henderson, NV 89014  
 Phone: 702-342-0456  
 Fax: N/A  
 Email: Compliance@onpointcxsolutions.com

### **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.

The Applicant does not have any affiliates doing 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.

The Applicant does not have any predecessors that have done business.

- 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.

The Applicant currently has an Electric Generation Supplier (EGS) license application pending before the Pennsylvania Public Utility Commission at Docket No. A-2025-3056823.

#### 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.

The Applicant intends to establish a natural gas agency/broker/consultancy business in the Commonwealth of Pennsylvania. The Applicant is currently registered as a telemarketer in Indiana, New Hampshire, New Jersey and Pennsylvania. The Applicant does not currently hold any gas broker license in any other state. The Applicant will be representing Natural Gas Suppliers (NGS) in the Commonwealth of Pennsylvania. The Applicant will not be taking title to the natural gas.

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         |   |

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.

Immediately upon receipt of license.

## 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.

The Applicant has no proceedings to list.

- 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.

The Applicant has no actions or complaints to list.

- 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. **N/A**

## 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.

N/A

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

SEE EXHIBIT 3

- 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 4

- **Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)**

The Applicant is a newly established business and does not yet have published financial or credit information such as a 10-Q, 10-K, or other SEC filings. The business has not been in operation long enough to generate such reports and therefore this requirement is not applicable at this time.

- **Applicant's accounting statements, including balance sheet and income statements for the past two years.**

The Applicant is a newly established business and, as such, does not have historical accounting statements, including balance sheets or income statements for the past two years. This information is not applicable at this time due to the company's recent formation.

- **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.**

The Applicant is a newly established business and does not yet have an established credit rating or credit report from agencies such as Dun & Bradstreet, Moody's, S&P, or Fitch. Therefore, this requirement is not applicable at this time.

- **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.**

The Applicant carries standard forms of business insurance. Since the Applicant is not a supplier, no additional insurance has been acquired or is appropriate. The Applicant Maintains, among other coverages; (i) Professional Liability insurance policy in the amount of \$2,000,000, (ii) a Workers' Compensation insurance policy in the amount of \$1,000,000, and (iii) an Umbrella insurance policy in the amount of \$1,000,000, in each case to support its financial fitness to perform its obligations as a licensee.

- **Audited financial statements exhibiting accounts over a minimum two-year period.**

The Applicant is a newly established business and, as such, does not have audited financial statements covering a minimum two-year period. This requirement is not applicable at this time due to the company's recent formation.

- 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 EXHIBIT 5

- 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.

N/A

- d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.

Applicant will receive compensation directly from licensed natural gas suppliers through broker agreements.

Fees will typically be structured as commissions based on customer enrollments, energy usage, or other mutually agreed-upon performance metrics, as outlined in our contracts with each supplier. These payments will be made by the supplier to OnPoint CX Solutions LLC and will not involve any financial transactions with end-use customers.

- 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.

Desiree Arnold, Owner  
2925 N Green Valley Pkwy, Ste C  
Henderson, NV 89014  
Phone: 702-342-0456  
Fax: N/A  
Email: Compliance@onpointcxsolutions.com

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application.

*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.
- Summary and proof of licenses 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.

- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

SEE EXHIBIT 6

**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.

All agents will receive detailed training prior to engaging with customers. This includes instruction on regulatory requirements, proper scripting, customer rights, prohibited practices, third-party verification (TPV) procedures, and supplier-specific protocols. Training materials will be provided or approved by licensed NGS suppliers.

**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.

SEE EXHIBIT 7

## 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. *N/A*

## 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.

**X**      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 30<sup>th</sup> following the end of the calendar year per 52 Pa. Code § 62.110.

**X**      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.

**X**      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.

**X**      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.

**X**      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.
- 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.

## 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 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.

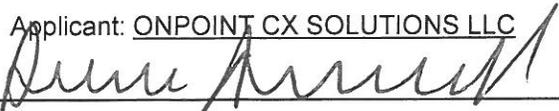
The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and **must be supplied to the Commission before the applicant is licensed.**

	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: ONPOINT CX SOLUTIONS LLC

By: 

Title: Owner

## 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: 

X	<b>Signature</b>	
X	<b>Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)</b>	
X	<b>Application Affidavit</b>	
X	<b>Operations Affidavit</b>	
X	<b>Tax Certification Statement</b>	
X	<b>Commonwealth Department of State Verification</b>	
X	<b>Certificate of Service</b>	

Applicant's Use

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

State of California :

County of Orange : ss.

Desiree Arnold, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

She is the Owner of OnPoint CX Solutions LLC;

She is authorized to and does make this affidavit for said Applicant;

That the Applicant herein OnPoint CX Solutions LLC 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 OnPoint CX Solutions LLC has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein OnPoint CX Solutions LLC 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 OnPoint CX Solutions LLC 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.

*Desiree Arnold*  
Signature of Affiant

Sworn and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

*See attached*  
\_\_\_\_\_  
Signature of official administering oath

My commission expires \_\_\_\_\_.

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

- See Attached Document (Notary to cross out lines 1–6 below)
- See Statement Below (Lines 1–6 to be completed only by document signer[s], not Notary)

1 \_\_\_\_\_

2 \_\_\_\_\_

3 \_\_\_\_\_

4 \_\_\_\_\_

5 \_\_\_\_\_

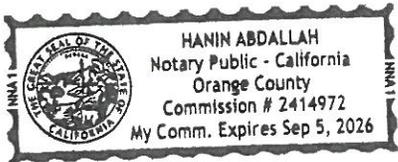
6 \_\_\_\_\_

Signature of Document Signer No. 1 \_\_\_\_\_ Signature of Document Signer No. 2 (if any) \_\_\_\_\_

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
 County of Orange

Subscribed and sworn to (or affirmed) before me  
 on this 15<sup>th</sup> day of September, 2025,  
 by \_\_\_\_\_  
 Date Month Year  
 (1) Desiree Jean Arnold



(and (2) \_\_\_\_\_),  
 Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature \_\_\_\_\_  
 Signature of Notary Public

Place Notary Seal and/or Stamp Above

**OPTIONAL**

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: Application Affidavit

Document Date: N/A Number of Pages: 1

Signer(s) Other Than Named Above: N/A

Appendix B

OPERATIONS AFFIDAVIT

State of California :

: ss.

County of Orange :

Desiree Arnold, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

She is the Owner of OnPoint CX Solutions LLC;

That she is authorized to and does make this affidavit for said Applicant;

That OnPoint CX Solutions LLC, 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 OnPoint CX Solutions LLC, 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 OnPoint CX Solutions LLC, 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 OnPoint CX Solutions LLC, 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 \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

*see attached*  
\_\_\_\_\_  
Signature of official administering oath

My commission expires \_\_\_\_\_.

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

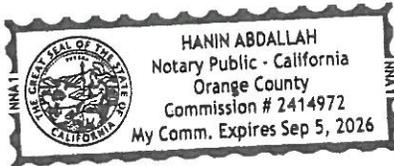
1 \_\_\_\_\_  
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 5 \_\_\_\_\_  
 6 \_\_\_\_\_

*Signature of Document Signer No. 1*                      *Signature of Document Signer No. 2 (if any)*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
 County of Orange

Subscribed and sworn to (or affirmed) before me  
 on this 15<sup>th</sup> day of September, 2025,  
 by Desiree Jean Arnold  
 (1) \_\_\_\_\_



(and (2) \_\_\_\_\_),  
*Name(s) of Signer(s)*

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Signature]  
*Signature of Notary Public*

*Place Notary Seal and/or Stamp Above*

**OPTIONAL**

*Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.*

**Description of Attached Document**

Title or Type of Document: Operations Affidavit

Document Date: N/A                      Number of Pages: 2

Signer(s) Other Than Named Above: N/A

## Appendix C

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

### CERTIFICATE OF SERVICE TEMPLATE

On this the 15<sup>th</sup> day of September 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 Small Business Advocate**

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

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

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

**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](mailto:czechowiczd@natfuel.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](mailto: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](mailto:pgwchoicesupply@pgworks.com)

**Valley Energy Inc.**

Ed Rogers  
523 South Keystone Avenue  
Sayre, PA 18840-0340  
PH: 570.888-9664  
email: [erogers@centerprises.org](mailto:erogers@centerprises.org)

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

Strawberry Square, 14th Floor  
Harrisburg, PA 17120

**Department of Revenue  
Bureau of Compliance**

PO Box 281230  
Harrisburg, PA 17128-1230

**Columbia Gas of PA, Inc.**

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

**PECO**

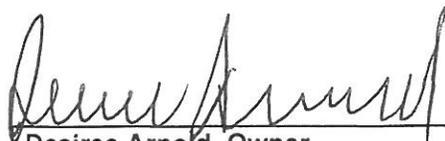
Suzette Adams, Sr. Manager, Gas Supply and  
Transportation  
2301 Market Street, S-18  
Philadelphia, PA 19103  
PH: 215.841.6467  
Email: [Suzette.Adams@exeloncorp.com](mailto:Suzette.Adams@exeloncorp.com)

**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](mailto:Carol.Scanlon@peoples-gas.com)

**UGI Utilities, Inc. – Gas Division**

Sherry Epler  
1 UGI Drive  
Denver, PA 17517  
PH: 610.796.3447  
Email: [sepler@ugi.com](mailto:sepler@ugi.com)

  
Desiree Arnold, Owner  
ONPOINT CX SOLUTIONS LLC

# EXHIBIT 1

## **2B-1: BUSINESS ENTITIY AND DEPARMTNET OF STATE FILINGS:**

**Provide proof of compliance with appropriate Department of State filing requirements as indicated above.**

Attached please find the Applicant's foreign registration with the Commonwealth of Pennsylvania, Department of State.



0014699469



**COMMONWEALTH OF PENNSYLVANIA**  
 Department of State  
 Bureau of Corporations and Charitable Organizations  
 PO Box 8722  
 Harrisburg, Pennsylvania 17105-8722  
**AMENDMENT OF**  
**FOREIGN REGISTRATION STATEMENT**  
 Fee: \$250

Pennsylvania Department of State

**-FILED-**
 Amendment #: 0014699469  
 Date Filed: 8/6/2025

B0908-3811 08/06/2025 12:12 PM Received by Pennsylvania Department of State

**DSCB:15-413 (rev. 2/2017)**

In compliance with the requirements of [15 Pa.C.S. § 413](#) (relating to amendment of foreign registration statement), the undersigned foreign association desires that its registration be amended to change the following information:

Foreign Business Information	
File number	0014553995
Current name	ONPOINT CX SOLUTIONS LLC
Filing type	Foreign Limited Liability Company
LLC filing subtype	Limited Liability Company
Jurisdiction of formation	DELAWARE
Filing Type After Amendment	
Change type of association with this amendment?	I do not want to change the type of association
Effective Date	
The filing shall be effective upon filing in the Department of State	
Additional Information	
Jurisdiction of Formation	I do not want to change the jurisdiction of formation
Series	The association may not have series.
Current Registered Office or Commercial Registered Office Provider	
Search for Commercial Registered Office Provider (CROP)	REPUBLIC REGISTERED AGENT LLC Commercial Registered Office Provider
Venue and Publication County	ALLEGHENY
The street address of the association's principal office.	
Current Principal Office Address	DESIREE ARNOLD 254 CHAPMAN RD STE 208 PMB 23485 NEWARK, DE 19702-5422
New Principal Office Address	DESIREE ARNOLD 2925 N GREEN VALLEY PKWY STE C HENDERSON, NV 89014-0418
The mailing address of the association's principal office.	
Current Mailing Address	DESIREE ARNOLD 2764 N GREEN VALLEY PKWY #503 HENDERSON, NV 89014
New Mailing Address	DESIREE ARNOLD 2925 N GREEN VALLEY PKWY STE C HENDERSON, NV 89014-0418
Additional Changes (Optional)	
Additional changes	There are no additional changes

Electronic Signature

IN TESTIMONY WHEREOF, the above-named association has caused this Amendment of Foreign Registration Statement to be signed by a duly authorized representative.

Full Name	Title	Date
Desiree Arnold	Owner	08/06/2025

## EXHIBIT 2

### **2B-2: BUSINESS ENTITIY AND DEPARMTNET OF STATE FILINGS:**

**Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.**

Attached please find the Applicant's certificate of formation and certificate of good standing in the state of Delaware.

**STATE of DELAWARE  
CERTIFICATE of FORMATION  
A LIMITED LIABILITY COMPANY**

**ARTICLE I.**

The name of this limited liability company is ONPOINT CX SOLUTIONS LLC.

**ARTICLE II.**

Its registered office in the State of Delaware is to be located at 262 Chapman Rd, Ste 240, Newark DE 19702. The registered agent in charge thereof is REPUBLIC REGISTERED AGENT LLC.

**ARTICLE III.**

The period of duration of the limited liability company shall be perpetual.

**ARTICLE IV.**

The purpose of the limited liability company is to engage in any lawful act or activity for which limited liability companies may be organized under the Delaware Limited Liability Company Act.

**ARTICLE V.**

The name and address of each initial member of the limited liability company is:

Desiree Arnold - 254 CHAPMAN RD, STE 208 #23485, NEWARK, DELAWARE 19702

I, **the undersigned**, for the purpose of forming a limited liability company under the laws of the State of Delaware, do make, file and record this Certificate, and do certify that the facts herein stated are true, and I have accordingly hereunto set my hand and executed this Certificate of Formation on the date below.

**Dated:** June 20, 2025



Lovette Dobson, Organizer

# Delaware

Page 1

The First State

I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "ONPOINT CX SOLUTIONS LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FIRST DAY OF SEPTEMBER, A.D. 2025:



10235178 8300

SR# 20253663204

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

*C. P. Sanchez*

Charuni Patibanda-Sanchez, Secretary of State

Authentication: 204622731

Date: 09-01-25

## EXHIBIT 3

### **7A: 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.**

Attached please find the letters sent by the NGDCs stating the bonding requirements for the Applicant.

August 29, 2025

Desiree Arnold  
OnPoint CX Solutions LLC  
2764 N Green Valley Pkwy #503  
Henderson, NV 89014

Dear Desiree Arnold:

We are pleased that OnPoint CX Solutions LLC has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, OnPoint CX Solutions LLC could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. OnPoint CX Solutions LLC has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that OnPoint CX Solutions LLC does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

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

Please feel free to contact me at 614-460-4881 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,



Debbie Vair  
Manager C&I Account Management and Gas Transportation Support Services



**National Fuel®**

September 3, 2025

Desiree Arnold  
OnPoint CX Solutions LLC  
2925 N Green Valey Pkwy, Ste C  
Henderson, NV 89014

Dear Desiree,

National Fuel Gas Distribution Corporation (“NFGDC”) is aware OnPoint CX Solutions LLC (OPS) has filed an application with the Pennsylvania Public Utility Commission to supply natural gas service to the public in Pennsylvania and specifically within the service territory of NFGDC.

As you know, in making such an application, OPS must furnish acceptable security to each utility where OPS will do business. As such, under its tariff, NFGDC could require OPS to provide a bond or other financial security instrument in an amount that NFGDC determines to be appropriate.

However, you have indicated, and it is NFGDC’s understanding that OPS intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, OPS will never take title to any delivered natural gas, nor will it accept any customer payments or deposits.

Based upon your representations, NFGDC has determined that, at this time, OPS does not need to post a bond or other form of security to operate in its service territory. However, if the services provided by OPS change in the future, NFGDC reserves the right to require security from OPS as it deems appropriate.

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

Yours truly,

Jason Allen  
Transportation Services Department



peco<sup>SM</sup>

AN EXELON COMPANY

September 4, 2025

Desiree Arnold, Owner  
OnPoint CX Solutions, LLC  
2925 N Green Valley Pkwy, Ste C  
Henderson, NV 89014-0418

Re: Bonding Requirements

Dear Desiree Arnold:

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

If you should have any questions regarding this matter, please contact Wanda Rucker at [Trevor.Hope@exeloncorp.com](mailto:Trevor.Hope@exeloncorp.com).

Respectfully submitted,

*Suzette Adams*

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



375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](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)

August 29, 2025

Ms. Desiree Arnold  
Owner  
ONPOINT CX SOLUTIONS LLC  
2925 N Green Valley Parkway, Suite C  
Henderson, NV 89014

Dear Ms. Arnold:

We are pleased that ONPOINT CX SOLUTIONS LLC has applied for a license to provide natural gas services on Peoples Natural Gas Company LLC.

Since ONPOINT CX SOLUTIONS LLC is not currently serving customers on the Peoples systems, we have determined at this time that ONPOINT CX SOLUTIONS 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 ONPOINT CX SOLUTIONS LLC 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,

A handwritten signature in blue ink that reads "Carol Scanlon".

Carol Scanlon  
Manager, Rates  
Peoples Natural Gas Company LLC

Cc: Stephen Kelly  
Mina Speicher



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

---

8/28/25

Ms. Desiree Arnold  
2925 N. Green Valley Parkway, Suite C  
Henderson, NV 89014

Email: [compliance@onpointcxsolutions.com](mailto:compliance@onpointcxsolutions.com)

RE: Security Requirement Bond for ONPOINT CX SOLUTIONS LLC

Dear Ms. Arnold:

Philadelphia Gas Works ("PGW") is aware that ONPOINT CX SOLUTIONS LLC has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works.

As you know, in making such an application, ONPOINT CX SOLUTIONS LLC must furnish acceptable security to each utility where ONPOINT CX SOLUTIONS LLC will do business. As such, under its tariff, Philadelphia Gas Works could require ONPOINT CX SOLUTIONS LLC to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate.

However, you have indicated, and it is Philadelphia Gas Works' understanding, that ONPOINT CX SOLUTIONS LLC intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services ONPOINT CX SOLUTIONS LLC will never take title to any delivered natural gas.

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

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

Sincerely,

*Robert Smith*

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

/js



UGI Utilities, Inc.  
1 UGI Drive  
Denver, PA 17517  
610-796-3400

VIA E-MAIL

August 28, 2025

OnPoint CX Solutions, LLC  
2925 N. Green Valley Parkway  
Suite C  
Henderson, NV 89014

**ATTENTION:** Desiree Arnold, Owner  
[compliance@onpointcxsolutions.com](mailto:compliance@onpointcxsolutions.com)

**RE: OnPoint CX Solutions, LLC  
Application to Serve as a Natural Gas Broker**

Dear Ms. Arnold,

Based on your assertion that OnPoint CX Solutions, LLC ("OnPoint") is applying with the State of Pennsylvania to operate as a natural gas broker/marketer, UGI Utilities, Inc.-Gas Division ("UGIU") has concluded that OnPoint will not need to post security with UGIU. This is based on the declaration that OnPoint will be acting in conjunction with a licensed natural gas supplier who has been approved by the Pennsylvania Public Utility Commission to serve in the applicable UGIU service territories and who has posted the required financial security as specified in the UGIU Tariff. If OnPoint wishes to directly serve Choice customers in the service territories of UGIU in the future as a natural gas supplier, it will have to post security as specified in the UGIU Tariff prior to the commencement of the service.

Please feel free to contact me with any additional questions you may have.

Sincerely,

A handwritten signature in blue ink that reads 'Sherry Epler'.

Sherry Epler  
Senior Manager  
Tariff & Supplier Administration

SE/rks



# VALLEY ENERGY

523 S. Keystone Avenue, Sayre, PA 18840  
800-998-4427 • 570-888-9664 • valley-energy.com

August 28, 2025

**VIA EMAIL**

Desiree Arnold, Owner  
OnPoint CX Solutions, LLC  
2925 N. Green Valey, Ste C  
Henderson, NV 89014  
[compliance@onpointcxsolutions.com](mailto:compliance@onpointcxsolutions.com)

**RE: OnPoint CX Solutions, LLC**

Dear Ms. Arnold:

We understand that OnPoint CX Solutions, LLC has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania, including our company's service area.

Pursuant to 66 Pa.C.S. § 2208(c), an applicant for a natural gas supplier license must furnish security to each utility where it will do business to ensure the supplier's financial responsibility. To this end, Valley Energy periodically will perform a credit review and analysis of OnPoint CX Solutions, LLC when it begins to serve customers on Valley Energy's system. Valley Energy will determine whether OnPoint CX Solutions, LLC must post a security based on the credit review, the types of customers served, the volumes expected to be delivered for those customers and the other rules in Valley Energy's Supplier Tariff. At this time, no security is being requested; however, if the services provided change in the future, we reserve the right to require security from OnPoint CX Solutions, LLC as deemed appropriate.

If you have any questions, please contact Jamie Beale at 570-888-9664 (Ext. 5232).

Sincerely,

Edward E. Rogers  
President & CEO

EER/km

cc: J. Beale, Valley Energy

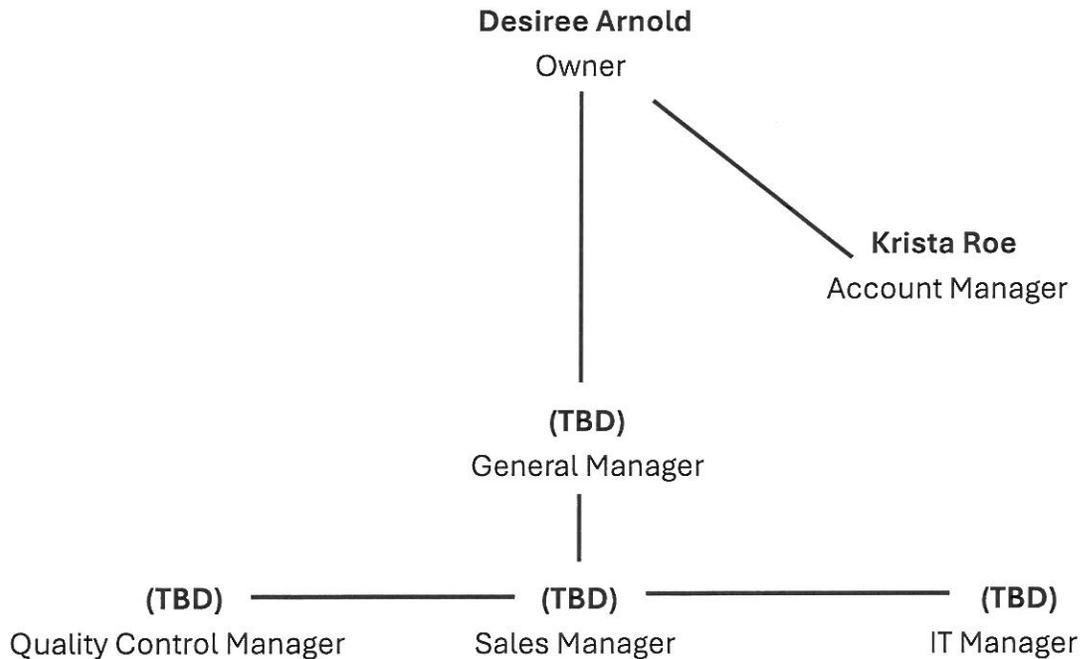
# EXHIBIT 4

## 7B: FINANCIAL RECORDS, STATEMENTS, AND RATINGS:

- **Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.**

The Applicant, OnPoint CX Solutions, LLC, was formed on June 20, 2025 and as such has a very limited organizational structure at this time. The Applicant does not have any parent, affiliate or subsidiary companies. The Applicant is owned by Desiree Arnold (100%).

Proposed Organizational Structure:



## EXHIBIT 5

### 7B. FINANCIAL RECORDS, STATEMENTS, AND RATINGS:

- **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.**

The Applicant, OnPoint CX Solutions, LLC, was organized on June 20, 2025, and therefore does not yet have audited financial statements, a line of credit, or extensive operating history. In lieu of those documents, attached please find the following documents to demonstrate financial fitness:

- A 12-month business plan and pro forma financial projection statements which include 12-month financial projection, cash flow forecast, balance sheet and an assumptions narrative explaining where the numbers come from.
- Three most recent business bank account statement summary pages. Transaction details have been omitted to protect confidentiality but can be made available to the Commission upon request.
- A recent bank account summary printout from our banking portal reflecting the current available balance as of September 5, 2025.

The above-mentioned documents are CONFIDENTIAL and will be filed separately with the Commission via overnight delivery service.

# EXHIBIT 6

## **8A. EXPERIENCE, PLAN, STRUCTURE:**

### **-Applicant's previous experience in the gas industry.**

OnPoint CX Solutions, LLC was formed on June 20, 2025 for the purpose of being a broker/telemarketer in natural gas and electricity. The Applicant is currently registered as a telemarketer in New Jersey and Pennsylvania. The Applicant does not currently hold any gas broker license in any other state. The Applicant will be calling commercial, industrial and residential accounts representing licensed Natural Gas Suppliers (NGS) in the Commonwealth of Pennsylvania. The Applicant will not be taking title to the natural gas.

The Owner, Desiree Arnold, brings over 15 years of experience in the deregulated energy sector and business process outsourcing (BPO) industry. She has supported large-scale operations of over 500 employees, with a focus on energy marketing campaigns. Ms. Arnold has extensive expertise in compliance with energy market regulations, agent training, and operational support for energy brokers and suppliers. Her strong foundation in human resources complements her hands-on management of workforce integrity within utility sales operations.

### **-Summary and proof of licenses as a supplier of natural gas in other states or jurisdictions.**

N/A

### **-Type of customers and number of customers Applicant currently serves in other jurisdictions.**

The Applicants role will be limited to facilitating agreements between licensed natural gas suppliers and end-use customers. The Applicant does not serve customers in any jurisdiction and does not maintain customer accounts.

### **-Staffing structure and numbers as well as employee training commitments.**

The Applicant is in the process of recruiting experienced agents with backgrounds in the deregulated energy market. While hiring is ongoing, the Applicant's entire staff will undergo comprehensive training using materials provided by licensed NGS suppliers. Training covers calling regulations, industry protocols, customer interactions, and compliance with Commonwealth of Pennsylvania requirements. Our Quality Control department will conduct regular monitoring to ensure full adherence to regulatory and supplier standards.

# EXHIBIT 6

## **-Business plans for operations within the Commonwealth.**

The Applicant is a newly established entity applying for licensure as a Natural Gas Supplier (NGS) in the Commonwealth of Pennsylvania. The Applicant seeks approval to operate solely as a Broker/Marketer.

The Applicant will not take title to the electricity or natural gas being supplied and will not be involved in billing.

## **-Any other information appropriate to ensure the technical capabilities of the Applicant.**

The Applicant has already obtained telemarketing registrations in other states, demonstrating its understanding of compliance requirements and its ability to meet regulatory obligations. Through a combination of regulatory experience, industry knowledge and structured planning, Applicant is well-positioned to provide services in a manner that maintains the quality and availability of service provided by natural gas utilities.

In addition to the experience and compliance measures already outlined, OnPoint CX Solutions LLC offers the following information to further support the Applicant's technical capabilities:

- **Leadership Experience:** The company is led by Desiree Arnold, who brings over 15 years of compliance experience in the deregulated energy sector. Her background includes supporting large-scale BPO teams and energy marketing campaigns, ensuring strict adherence to utility and supplier requirements in regulated markets.
- **Industry Familiarity:** The Applicant has a deep understanding of energy market operations, including third-party verification (TPV), scripting compliance, customer disclosure requirements, and Public Utility Commission (PUC) regulations. This knowledge base is critical to maintaining compliant and ethical marketing practices.
- **Operational Readiness:** Although newly established, the Applicant is actively building infrastructure to support natural gas supplier operations as a broker/marketer. This includes finalizing telemarketing registrations, broker licenses, and foreign business qualifications in several states.
- **Compliance-Focused Systems:** The Applicant is implementing internal compliance and quality assurance protocols—including agent training programs,

## EXHIBIT 6

call monitoring, and escalation procedures—to ensure full regulatory adherence in all customer interactions.

These combined qualifications demonstrate that the Applicant is prepared to operate responsibly and technically fit to fulfill its obligations as a licensed broker/marketer in the Commonwealth of Pennsylvania.

# EXHIBIT 7

**8E. 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.**

## **Desiree Arnold - Professional Profile**

Results-oriented and highly organized Human Resources and Operations leader with over 15 years of experience in the deregulated energy sector and business process outsourcing (BPO) industry. Proven track record in supporting and managing large-scale teams, ensuring compliance with energy regulations, and developing high-impact training programs. Expert in aligning HR and operational practices with regulatory and business requirements. Recognized for integrity, attention to detail, and ability to navigate complex organizational challenges.

### **Areas of Expertise**

- Deregulated Energy Operations
  - Energy Compliance & PUC Regulations
  - Employee Relations & HR Leadership
  - Sales Agent Training & Performance Management
  - Recruiting & Workforce Development
  - EDD, FMLA, Disability, Workers’ Compensation
  - HRIS & Payroll Administration
  - Regulatory Reporting & Documentation
- 

## **Owner – OnPoint CX Solutions LLC**

*Henderson, NV | June 2025 – Present*

Founded an energy services company that is focused on telemarketing and broker/marketer services that connect customers with licensed electricity and gas suppliers in deregulated markets. Currently in the process of obtaining necessary foreign registrations, telemarketing licenses and broker licenses across multiple U.S. states and territories to support business expansion and regulatory compliance.

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# EXHIBIT 7

## **Human Resources Generalist – AGR Group Nevada, LLC**

*Henderson, NV | February 2021 – June 2025*

Managed all aspects of employee administration, including onboarding, offboarding, employee records, payroll support, benefits administration and employee relations. Collaborated with sales agents representing electricity and gas suppliers in deregulated markets. Ensured all HR policies aligned with regulatory bodies and supplier compliance requirements. Designed and led recurring training programs for sales agents covering key topics such as scripting, customer disclosures, third-party verification (TPV), and legal/regulatory compliance. Served as a liaison between external energy clients and internal leadership teams to implement real-time updates to policies, regulatory changes, and process improvements.

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## **Human Resources Director – AGR Group**

*Santa Ana, CA | December 2002 – June 2016*

Led HR operations for a high-volume energy sales organization with over 500 employees, supporting both inbound and outbound deregulated energy campaigns. Ensured compliance with labor laws, oversaw HR strategy, and supported organizational growth through talent acquisition and employee relations management.

### **Key Responsibilities & Achievements:**

- **HR Strategy & Leadership:** Advised executives on HR policy, employee relations, performance management, and investigations. Implemented revised job descriptions and performance review systems.
- **Recruitment & Hiring:** Conducted full-cycle recruitment including sourcing, screening, interviews, and onboarding. Streamlined recruitment pipelines and evaluated effectiveness of advertising channels.
- **Compliance Management:** Administered complex documentation related to EDD, FMLA, Disability, Workers' Compensation, COBRA, and unemployment claims. Represented company during hearings and audits.
- **HR Administration:** Developed and maintained HRIS systems to manage employee data and track corrective actions. Ensured confidentiality in all personnel and legal documentation.
- **Training Programs:** Launched supervisor training and employee recognition programs including "Employee of the Month" to improve morale and retention.