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June 2, 2026

Matthew L. Homsher
Pennsylvania Public Utility Commission
Secretary's Bureau
400 North Street, Keystone Building
Harrisburg, PA 17120
jmccracken@pa.gov

Re: Docket No. A-2026-3062519 - TLG Commodities LLC

Dear Mr. Homsher:

Enclosed please find TLG Commodities LLC's ("TLG") responses to the Pennsylvania Public Utility Commission's (the "Commission") data requests issued in the May 29, 2026 Secretarial Letter, filed in the above-captioned docket. As some of the data request responses include confidential financial information, TLG is simultaneously filing all such non-public information with the Secretary's Share Point File system, with those documents marked "CONFIDENTIAL." In addition, TLG is providing a verification of Hunter Lee, Chief Executive Officer, and the following updates and exhibits:

Section 8(a): TLG has recently received its Electric Service Provider registration in California (#1404) to act as a competitive supplier in the retail market for C&I customers.

Section 8(f): TLG has received approval from FERC to be a Power Marketer pursuant to Docket No. ER26-2027-000. Please refer to the June 2, 2026 Update Exhibits.

TLG has included the revisions described as the June 2, 2026 Update Exhibit 1 and the relevant FERC ruling in Docket No. ER26-2027 as the June 2, 2026 Update Exhibit 2. Please note, these updates are also relevant to Attachment C1, where TLG previously had noted it did not yet have approvals from state regulatory commissions to be an active retail marketer, and Attachment C4, where TLG previously noted it was in the process of receiving power marketer status.

DUANE MORRIS LLP

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PITTSBURGH, PA 15222-3112

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June 2, 2026
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Please do not hesitate to reach out should you have any questions.

Regards,

DUANE MORRIS LLP



Michael P. Pest

Enclosures

VERIFICATION

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

Signature Wyatt Elbin
Title VP of Regulatory
Date June 26, 2026

Docket No. A-2026-3062519
TLG Commodities LLC
Responses to Data Requests 1 through 3

Question 1: Reference Application, Section 1.b, Registered Agent – Applicant provided a telephone number for its registered agent (C T Corporation System) that appears to belong to Penncorp Servicegroup Inc. Please explain the and provide an updated Application page with the appropriate corrections, if necessary.

Response: The contact information provided is correct:

Agent to be Appointed Name: C T Corporation System

Address: 600 N. 2nd Street, Suite 401

Harrisburg, Pennsylvania 17101-1071

Phone Number: 717-234-2300

Individual Agent to be Appointed: Wayne Dietrich c/o C T Corporation System.

However, upon receipt of these data requests, TLG submitted additional inquiries to C T Corporation System and can provide to the Public Utilities Commission that, to speak with a C T Corporation System representative for registered agent service, the extension to dial is 105. Wayne Dietrich remains the authorized individual appointed as agent, but calling the extension will route the caller to a representative of the C T Corporation System office who will receive and forward service of process. Penncorp is the Pennsylvania partner of C T Corporation System.

TLG has included the attached Exhibit DR-1 with an updated page of the application that includes the extension.

Docket No. A-2026-3062519
TLG Commodities LLC
Responses to Data Requests 1 through 3

Question 2: Reference Application, Section 7.b, Financial Fitness – Please provide at least three recent consecutive months of applicant’s bank statements.

Response: Please refer to Exhibit DR-2 (CONFIDENTIAL) for the requested information.

REDACTED

Docket No. A-2026-3062519
TLG Commodities LLC
Responses to Data Requests 1 through 3

Question 3: Reference Application, Section 7.c, Supplier Funding Method - Please provide applicant's fully-executed credit agreement.

Response: Please refer to Exhibit DR-3 (CONFIDENTIAL) for the requested information.



June 2 Update Exhibit 1

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 electric utilities 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 electricity industry.
- Summary and proof of licenses as a supplier of electric 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.
- Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

b. Please see Attachment C for TLG's experience, plan, and company structure. Attachment C includes relevant, key employee resumes as well as a narrative describing its technical fitness. TLG has recently received its Electric Service Provider registration in California (#1404) to act as a competitive supplier in the retail market for C&I customers.

b. PROPOSED MARKETING METHOD (check all that apply)

- Internal – Applicant will use its own internal resources/employees for marketing
- External EGS – Applicant will contract with a PUC **LICENSED EGS** broker/marketer
- Affiliate – Applicant will use a **NON-EGS** affiliate marketing company and or individuals.
- External Third-Party – Applicant will contract with a **NON-EGS** third party marketing company and or individuals
- Other (Describe):

- TLG has not yet finalized external marketing relationships and presently plans to use its own internal resources/employees for marketing. However, as the business grows, TLG may utilize third party brokers or marketers.

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.

- TLG will employ truthful, non-misleading marketing and compliance with the Commission's standards. TLG will ensure compliance with the Commission’s relevant marketing rules applicable to C&I customers, including 52 Pa. Code §§ 54.3, 54.6, and 54.43, as well as the Licensee Code of Conduct (52 Pa. Code § 62.114).

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.

- Hunter Lee, CEO and John Grossarth, President, are TLG’s chief officers. Other key managerial staff includes Wyatt Elbin, Richa Cook, and Charlie Sumner. Resumes for these officers and key managerial employees’ can be found in Attachment C. Resumes include date ranges and job descriptions as requested.

f. **FERC FILING:** Applicant has:



Filed an Application with the Federal Energy Regulatory Commission to be a Power Marketer.



Received approval from FERC to be a Power Marketer at Docket or Case Number • [ER26-2027](#). Please refer to the June 2, 2026 Update Exhibit 2, attached.



Not applicable

9. DISCLOSURE STATEMENTS:

Disclosure Statements: If proposing to serve Residential and/or Small Commercial (under 25 kW) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix J to this Application.

- Electricity 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.

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

- Not applicable (TLG is not proposing to serve Residential and/or Small Commercial customers).

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

TLG Commodities LLC
(Applicant)

Docket No. ER26-2027-000

Issued: June 1, 2026

Reference: Market-Based Rate Authorization

On April 3, 2026, Applicant submitted an application for market-based rate authority with an accompanying tariff. The proposed market-based rate tariff provides for the sale of energy, capacity, and ancillary services at market-based rates as specified in Applicant's tariff. Applicant requests waivers commonly granted to similar market-based rate applicants. Applicant's market-based rate tariff is accepted for filing, effective June 3, 2026, as requested.¹ Based on Applicant's representations, Applicant meets the criteria for a Category 2 seller in the Northeast region and a Category 1 seller in all other regions, and is so designated.²

¹ TLG Commodities LLC, Market Based Rates; [Section 1, Market Based Rates \(1.0.0\)](#). If Applicant does not have appropriate citations in its tariff, the next time Applicant makes a market-based rate filing with the Commission, it must include a revised tariff in compliance with Order Nos. 697 and 697-A to include appropriate citations. *See Market-Based Rates for Wholesale Sales of Elec. Energy, Capacity & Ancillary Servs. by Pub. Utils.*, Order No. 697, 119 FERC ¶ 61,295, at P 916 (2007), *order on reh'g*, Order No. 697-A, 123 FERC ¶ 61,055, at P 384 (2008). *See also Niagara Mohawk Power Corporation*, 121 FERC ¶ 61,275 (2007) at P 8. Additionally, the Commission removed section 141.14 from its regulations effective March 28, 2019. *Elimination of Form 80 & Revision of Reguls. on Recreational Opportunities & Dev. at Licensed Hydropower Projects*, 165 FERC ¶ 61,256, at P 32 (2018). If Applicant's tariff includes a reference to section 141.14 of the Commission's regulations, the next time Applicant makes a market-based rate filing with the Commission, it must remove language referring to section 141.14 of the Commission's regulations from its tariff. *See Gunvor USA LLC*, 186 FERC ¶ 61,028, at P 32 n.35 (2024).

² *See Refinements to Policies and Procedures for Market-Based Rates for Wholesale Sales of Elec. Energy, Capacity & Ancillary Servs. by Pub. Utils.*, Order No. 816, 153 FERC ¶ 61,065, at P 320 (2015). Order No. 697, 119 FERC ¶ 61,295 at PP 848-850. Applicant must file an updated market power analysis for each region in which

The filing was publicly noticed. No protests or adverse comments were filed. Pursuant to Rule 214 of the Commission's regulations (18 C.F.R. § 385.214), notices of intervention, timely-filed motions to intervene, and any unopposed motions to intervene out-of-time filed before the issuance date of this order are granted.

Market-Based Rate Authorization

The Commission allows power sales at market-based rates if the seller and its affiliates do not have, or have adequately mitigated, horizontal and vertical market power.³

Applicant provided representations regarding its direct and upstream owners and the business activities of all direct and upstream owners and all affiliates. Applicant also includes representations regarding its horizontal market power analysis.⁴ Based on Applicant's representations, Applicant satisfies the Commission's requirements for market-based rate authority regarding horizontal market power.

With respect to vertical market power, Applicant represents that it and its affiliates either do not own, operate, or control any transmission facilities; or own, operate, or control transmission facilities that: (a) have a Commission-approved Open Access Transmission Tariff (OATT) on file; (b) are under the operational control of a regional transmission organization or an independent system operator; (c) have received waiver of the OATT requirement under 18 C.F.R. § 35.28(d)(1); or (d) satisfy the requirements for a blanket waiver under 18 C.F.R. § 35.28(d)(2).⁵ Further, Applicant affirmatively states that it and its affiliates have not erected barriers to entry and will not erect barriers to entry into the relevant market. Based on Applicant's representations, Applicant satisfies

it is designated as a Category 2 seller in compliance with the regional reporting schedule. See Order No. 816, 153 FERC ¶ 61,065 at P 353.

³ Order No. 697, 119 FERC ¶ 61,295 at PP 62, 399, 408, 440.

⁴ 18 C.F.R. § 35.37 (2025). See also Order No. 697, 119 FERC ¶ 61,295 at n. 216, PP 62, 298, 857; Order No. 816, 153 FERC ¶ 61,065 at P 39; *Data Collection for Analytics and Surveillance and Mkt.-Based Rate Purposes*, Order No. 860, 168 FERC ¶ 61,039, at P 6 (2019); *Refinements to Horizontal Market Power Analysis for Sellers in Certain Regional Transmission Organization and Independent System Operator Markets*, Order No. 861, 168 FERC ¶ 61,040, at PP 1-4 (2019).

⁵ See *Open Access and Priority Rights on Interconnection Customer's Interconnection Facilities*, Order No. 807, 150 FERC ¶ 61,211, *order on reh'g*, Order No. 807-A, 153 FERC ¶ 61,047 (2015).

the Commission's requirements for market-based rate authority regarding vertical market power.

Waivers, Authorizations, and Reporting Requirements

Applicant's request for waiver of Subparts B and C of Part 35 of the Commission's regulations requiring the filing of cost-of-service information, except for sections 35.12(a), 35.13(b), 35.15 and 35.16 is granted. Applicant's request for waiver of Part 41 and Part 141 of the Commission's regulations concerning accounting and reporting requirements is granted with the exception of 18 C.F.R. § 141.15.⁶ Applicant's request for waiver of Part 101 of the Commission's regulations is hereby granted, with the exception that waiver of the provisions of Part 101 that apply to hydropower licensees is not granted with respect to licensed hydropower projects.⁷ Notwithstanding the waiver of the accounting and reporting requirements here, Applicant is expected to keep its accounting records in accordance with generally accepted accounting principles.

Applicant requests blanket authorization under Part 34 of the Commission's regulations for all future issuances of securities and assumptions of liability. Applicant is authorized to issue securities and assume obligations or liabilities as guarantor, indorser, surety, or otherwise in respect of any security of another person; provided that such issue or assumption is for some lawful object within the corporate purposes of Applicant, compatible with the public interest, and reasonably necessary or appropriate for such purposes.⁸

⁶ See Order No. 697, 119 FERC ¶ 61,295 at PP 984-985.

⁷ Hydropower licensees are required to comply with the requirements of the Uniform System of Accounts pursuant to 18 C.F.R. Part 101 to the extent necessary to carry out their responsibilities under Part I of the Federal Power Act (FPA). We further note that a licensee's status as a market-based rate seller under Part II of the FPA does not exempt it from its accounting responsibilities as a licensee under Part I of the FPA. See Order No. 816, 153 FERC ¶ 61,065 at PP 345-350; *Seneca Gen., LLC*, 145 FERC ¶ 61,096, at P 23, n.20 (2013) (citing *Trafalgar Power, Inc.*, 87 FERC ¶ 61,207, at 61,798 (1999) (noting that "all licensees are required to comply with the requirements of the Uniform System of Accounts to the extent necessary to carry out their responsibilities under [s]ections 4(b), 10(d) and 14 of the FPA"))).

⁸ See Order No. 697, 119 FERC ¶ 61,295 at PP 999-1000.

Applicant must file Electric Quarterly Reports (EQRs) with the Commission, consistent with Order Nos. 2001⁹ and 768.¹⁰ Applicant must file EQRs electronically with the Commission consistent with the procedures set forth in Order No. 770.¹¹ Applicant further must timely report to the Commission any change in status that would reflect a departure from the characteristics the Commission relied upon in granting market-based rate authority, which may include the appointment of a non-independent director to a market-based rate seller's board (18 C.F.R. § 35.42).¹² Applicant must also comply with the requirements of Order Nos. 860 and 860-A, as well as the regulations promulgated pursuant to those rules.¹³

This action does not constitute approval of any service, rate, charge, classification, or any rule, regulation, or practice affecting such rate or service provided for in the filed documents; nor shall such action be deemed as recognition of any claimed contractual right or obligation affecting or relating to such service or rate; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by

⁹ *Revised Pub. Util. Filing Requirements*, Order No. 2001, 99 FERC ¶ 61,107, *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reh'g denied*, Order No. 2001-B, 100 FERC ¶ 61,342, *order directing filing*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), *order directing filing*, Order No. 2001-D, 102 FERC ¶ 61,334, *order refining filing requirements*, Order No. 2001-E, 105 FERC ¶ 61,352 (2003), *order on clarification*, Order No. 2001-F, 106 FERC ¶ 61,060 (2004), *order revising filing requirements*, Order No. 2001-G, 120 FERC ¶ 61,270, *order on reh'g and clarification*, Order No. 2001-H, 121 FERC ¶ 61,289 (2007), *order revising filing requirements*, Order No. 2001-I, 125 FERC ¶ 61,103 (2008).

¹⁰ *Elec. Mkt. Transparency Provisions of Section 220 of the Fed. Power Act*, Order No. 768, 140 FERC ¶ 61,232 (2012), *order on reh'g*, Order No. 768-A, 143 FERC ¶ 61,054 (2013).

¹¹ *See Revisions to Elec. Quarterly Report Filing Process*, Order No. 770, 141 FERC ¶ 61,120, at P 3 (2012) (citing Order No. 2001, 99 FERC ¶ 61,107 at P 31).

¹² *See also Reporting Requirement for Changes in Status for Pub. Utils. with Market-Based Rate Auth.*, Order No. 652, 110 FERC ¶ 61,097, *order on reh'g*, Order No. 652-A, 111 FERC ¶ 61,413 (2005). *Evergy Kan. Cent., Inc.*, 181 FERC ¶ 61,044, at P 45 (2022); *order on reh'g*, 184 FERC ¶ 61,003, at PP 24-26; *Energy Prepay II, LLC*, 185 FERC ¶ 61,111 at P 39 (2023).

¹³ Order No. 860, 168 FERC ¶ 61,039 (2019), *order on reh'g*, Order No. 860-A, 170 FERC ¶ 61,129 (2020).

the Commission in any proceeding now pending or hereafter instituted by or against Applicant.

This action is taken pursuant to the authority delegated to the Director, Division of Electric Power Regulation - West, under 18 C.F.R. § 375.307. This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R § 385.713.

Issued by: Amery S. Poré, Director, Division of Electric Power Regulation – West

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of TLG Commodities, LLC for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) [as specified in item #4b below] 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 fictitious name or d/b/a*), primary address, web address, and telephone number of Applicant:

- TLG Commodities LLC.
330 S. Cedros Ave, Suite 200,
Solana Beach, CA 92075
tlgcommodities.com
619-414-1824

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.

- Attn: Wayne Dietrich c/o C T Corporation System
C T Corporation System,
600 North Second Street, Suite 401,
Harrisburg, PA 17101
Telephone: 717-234-2300 ext. 105

b. **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.

- Wyatt Elbin
Vice President, Regulatory
330 S Cedros Ave, Suite 200,
Solana Beach, CA 92075
419-348-4057
wyatt@tlgcommodities.com

c. **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.