



September 8, 2026

DATE OF DEPOSIT

Via Overnight Mail

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Keystone Building
400 North Street
Harrisburg, PA 17120

SEP 11 2026

PA Public Utility Commission
Secretary's Bureau

Re: All Choice Energy MidAmerica LLC d/b/a Raava Energy / NGS License No. A-2021-3024607

Dear Secretary Homsher:

I write to advise you of the following update to Sections 5.b. and c. of Raava Energy's Application Form for Parties Wishing to Offer, Render, Furnish, or Supply Natural Gas Supply Services to the Public in the Commonwealth of Pennsylvania (the "Application").

1. (a) **Notice of Apparent Violation.** On January 27, 2026, the New York State Department of Public Service ("Department") issued a Notice of Apparent Violation ("NOAV") to All Choice Energy, LLC ("All Choice"). Raava Energy's corporate affiliate and a New York limited liability company, in Matter No. 26-00117. The NOAV alleged apparent noncompliance with Section 5.K of New York's Uniform Business Practices ("UBP") based on alleged unauthorized customer enrollments, commonly known as "slamming." The Department stated that it had received 24 slamming complaints concerning All Choice since February 2025, including six escalated complaints, and requested enrollment documentation, third-party-verification records, third party-marketer information, and refund calculations for specified complaints. All Choice responded that the complaints arose from enrollments made by PTM Marketing & Consulting Inc. ("PTM"), a third-party marketer whose relationship with All Choice had been terminated before the issuance of the NOAV. All Choice submitted the requested documentation, released the complaining customers without early-termination fees, issued refunds where appropriate, and implemented enhanced enrollment controls, including identification verification, GPS-enabled enrollment records, enhanced marketer training, and internal contract and third party-verification spot checks. In an April 13, 2026 supplemental response, All Choice reported that PTM had enrolled 787 customers, provided the requested enrollment information, and stated that it had not audited all PTM enrollments. The NOAV did not impose any penalty or make a final finding of a violation and remains pending resolution.
- (b) **Order to Show Cause.** On July 20, 2026, the New York State Public Service Commission ("Commission") instituted Case 26-E-0518 and issued an Order to Show Cause ("OTSC") against All Choice. The OTSC arises from Staff's investigation following the NOAV and alleges that All Choice, through PTM, improperly enrolled multiple customers without authorization, in violation of UBP § 5.K.1. Staff cited alleged deficiencies in certain PTM enrollment records, including missing, unclear, or illegible customer-identification documentation; acknowledgments that were checked rather than initialed; and an allegedly deficient third-party verification. Staff also alleged that All Choice did not adequately enforce its enrollment protocols, should have investigated PTM's conduct earlier, and did not audit all 787 PTM enrollments. All Choice contests the allegations in the OTSC. The Commission expressly stated that the OTSC is not a final determination of facts or legal conclusions, but rather a finding that Staff had identified sufficiently credible information to justify a formal proceeding and afford All Choice an opportunity to respond. The Commission directed All Choice to show cause why its eligibility to operate as a New York

ESCO should not be revoked and why other consequences under UBP § 2.D.6 should not be imposed. All Choice has received an extension to respond through September 17, 2026. The proceeding remains pending, and no final determination, penalty, suspension, or revocation has been issued.

Neither the aforementioned NOAV nor the OTSC are expected to have a material adverse affect on Raava's operations, compliance, financial fitness or technical fitness, as a NGS in the Commonwealth of Pennsylvania.

Please contact the undersigned, Elizabeth Polke, at 917-721-1435 or epolke@allchoiceenergy.com, or our counsel, Julie B. Steamer, Esq., at 917-664-1305 or jsteamer@steamerhart.com, if you require further information.

Respectfully submitted,



Elizabeth Polke
President

cc: Julie B. Steamer, Esq.

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PA Public Utility Commission
Secretary's Bureau

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PA PUBLIC UTILITY COMMISSION
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