

IN REPLY PLEASE REFER TO OUR FILE

Docket No. A-110072

DOCUMENT FOLDER

October 15, 2002

THE RICHARDS' ENERGY GROUP 1325 CROWN VETCH DRIVE LANDISVILLE PA 17538-

OCT 24 2002

2002 OCT 16 Mil 0: 58

ATTENTION: FRANK J RICHARDS PE

RE: License Bond or Other Financial Security

Dear Mr. Richards PE:

Pursuant to 66 Pa. C.S. §2809(c), no electric supplier license shall remain in force unless the licensee furnishes a bond or other security approved by the Commission to ensure the financial responsibility of the electric generation supplier and the supply of electricity at retail. The Commission's records indicate that the bond or other approved security provided by The Richards' Energy Group expires on 12/14/02.

The Commission's regulations at 52 Pa. Code §54.40(d) require "the security level for each licensee will be reviewed annually and modified primarily based upon the licensee's reported annual gross receipts information. The security level will be 10% of the licensee's reported gross receipts." The minimum security level provided may not be less than the initial security level provided when the license was granted. Unless approved by the Commission, the initial security level is \$250,000.

The Commission's regulations at 52 Pa. Code §54.39(b) require a licensee to file an annual report on or before April 30 of each year, for the previous calendar year, in order to comply with 66 Pa. C.S. §2810(c)(6). This report discloses the total amount of gross receipts from the sale of electricity and the total amount of electricity sold during the preceding calendar year. You must use this same information in calculating the appropriate security level necessary to maintain your license.

In order for your company to maintain its status as a licensed electric supplier in the Commonwealth of Pennsylvania, it must provide proof to the Commission that a bond or other approved security has been obtained.

Your response in this matter is requested within fifteen (15) days of the date of this letter. Submit your response to the Commission's Secretary. Additionally, fax a copy of your response to James Shurskis at (717) 787-4750, Bureau of Fixed Utility Services.

Failure to respond to this matter within fifteen (15) days will cause Commission staff to initiate a formal proceeding, that may lead to the following: cancellation of your company's electric supplier license, removal of your information from the Commission's website and notification to all electric distribution companies, in which your company is licensed to do business, of the cancellation of the license.

Please direct any questions to James Shurskis at (717) 787-8763 or Darren Gill at (717) 783-5244, Bureau of Fixed Utility Services.

Sincerely,

Robert A. Rosenthal

Director, Bureau of Fixed Utility Services

Robert a. Rosento

cc. J. McNulty, Secretary



DOCUMENT FOLDER

October 26, 2002

James McNulty, Secretary PA PUC P.O. Box 3265 Harrisburg, PA 17105-3265 A-110072

Dear Secretary McNulty:

This is a preliminary response to your October 15, 2002 letter re: License Bonds. The Richards' Energy Group is in the process of renewing the 5-\$50,000 bonds we have in place, which as we have stated in the past, more than cover our liability requirements since we don't take title to any power.

However, because of the financial misrepresentations which have occurred nationally in recent months, the underwriter for these bonds is now requiring more financials from each of the companies. Therefore, it may take some time before we can get all the information from each of the five companies and get it approved by the underwriter, so we may not be able to get your required proof of bond within 15 days of your letter. We request some additional time to accomplish this task.

Thank you.

Frank J. Richards, P.E.

Fax cc: James Shurskis, FUS Beth, Insurance & Surety

SRB



DOCUMENT FOLDER

November 8, 2002

Mr. James J. McNulty, Secretary PA PUC P.O. Box 3265 Harrisburg, PA 17105-3265 (3 copies)

RECEIVED

Petition to Reduce Security Bond For Richards' Energy Group Supplier License # A-110072 NOV 0 8 2002

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Dear Secretary McNulty:

Introduction

The Richards' Energy Group (REG) has been a licensed electric generation supplier (EGS) in the Commonwealth of Pennsylvania since January 14, 1999. As required in order to complete the EGS application, REG provided \$250,000 in security bonds. Since that time, REG has renewed these bonds at the same \$250,000 level each year, as required.

Petition Request

REG believes that Pennsylvania's revenue-neutral requirements for deregulation are not compromised by allowing REG to reduce the \$250,000 level of security bonding to \$10,000. Although REG is licensed as a "broker/marketer," its role has been, and remains, only as a consultant in regard to generation supply. A more appropriate handle would be "non-traditional" marketer, but this is not an option for electric licensing. REG is somewhat unique from many other EGSs in that it advises retail customers about their energy supply purchases, then implements two-party agreements between the EGS and the retail customer. REG does not take title to the energy sold by the EGS and purchased by the retail customer. Based on this distinction, it is not required to collect and therefore remit gross receipt taxes (GRT) to the PA Department of Revenue. The EGS supplying the actual energy is the entity responsible for collecting and paying the GRT.

REG is therefore requesting reduction of its required bonding level to \$10,000 (a level which has already been granted by the PUC for other non-traditional marketers). REG is also requesting that this relief be granted before the expiration of its current \$250,000 bond on December 14, 2002.

Precedent

As precedent, at least 2 other non-traditional marketers have petitioned successfully for similar relief based on similar reasoning, and this relief has been granted by the Commission. These include:

- Docket #A-110041, Affiliated Power Purchasers, Inc., January 10, 2002 Order
- Docket #A-110099, Parente Energy Consulting, LLC, May 4, 2001 Order.

REG Operation

REG has been an energy engineering/consulting firm since its inception in April, 1995. When deregulation activity began in Pennsylvania, REG developed a business plan to band together both small and large industrial, commercial and institutional electric consumers as a "strong" consortium to present a sizable load to "traditional" EGSs. These individual consumers form a purposely diverse group which, through REG, acts as a unit in dealing with EGSs to achieve substantial savings on electric bills.

To minimize risk for individual consumers and REG, contracts made with EGSs are always 2-party agreements between the EGS and the consumer, reviewed and approved by REG, with terms which reflect the deals developed for the group. REG has never, and does not intend to ever, take title to the electricity or be a party to the EGS/consumer electric supply agreement. Therefore, REG, by definition, has not, and can not, incur any Gross Receipts Tax liability

Using this model, REG consortium members have had a notable measure of success...Office of Consumer Advocate statistics on customers using EGSs as of October 1, 2002 show 275 MW of industrial and commercial load currently shopping in PPL territory...REG consortium members now supplied by EGSs in PPL represent 97 MW, or 35% of that total. This subset of REG members in PPL is currently saving about \$1,000,000/year.

Consumers pay REG an annual fee as members of the buying consortium, based on their annual kWh consumption and number of accounts...the fee is limited if savings benchmarks are not achieved. All fees are paid directly by consumers...REG does not receive funds back from EGSs.. prices negotiated with EGSs are the prices paid by consortium members. In this way, REG maintains autonomy and isolation from EGSs. REG is not beholden to any supplier.

Appendices

Further clarification can be found in the appendices attached:

- 1. Data requested by FUS
- 2. Identification of parties served
- 3. Gross Receipts Reports
- 4. REG Services, Members of Consortium

Thank you for your timely consideration.

Frank J. Richards, P.E.

President

Attachments

Fax cc: James Shurskis FUS (717) 787-4750 Robert Bennett FUS (717) 787-4750 Appendix 1

Electricity Supplier Bond Reduction Data The Richards' Energy Group Supplier License #A-110072 JOCUMENT FOLDER

- The Richards' Energy Group REG) has served the appropriate parties as specified in the Commission's Secretarial Letter, dated August 27, 2001, at Docket No. M-0-0011489, RE: Service of Petitions Relating to Bonding Levels. See Appendix #2 for appropriate documentation required by the Secretarial Letter.
- 2. Gross receipts reports for at least the four latest completed quarters are available in Appendix #3. As evidenced in Appendix #3, quarterly gross receipts taxes for the four latest completed quarters for REG are \$0. As stated in section 2810 (B) (3) of the Public Utility Code, 66 PA. C.S. and Article XI of the Tax Reform code of 1971, P.L. 6 No. 2, Article XI, Part I, Section 1101 (b), Gross receipts tax is derived from the sales or resale sales of electric energy. As REG does not take title to electric energy, the assessed gross receipts are null.
- As REG will not change its operational procedures during the current or next three quarters, the quarterly gross receipts tax will be null (Reference question 2, Appendix 3).
- 4 PA Gross receipts tax reports for the prior calendar year (Reference Appendix 3):
 - a. A self-assessment of \$0 for Gross Receipts tax has been paid in full
 - b. REG has paid \$0
 - c. Amount still due is \$0
 - d. The Report is settled with the Department of Revenue (\$0)
 - e. Final settlement amount is \$0

NOV 15 2002

- 5. Regarding REG gross receipts tax reports for the current calendar year, since REG will not be changing operationally, all gross receipts assessments will remain \$0:
 - a. Pre-payment amount would be non-applicable (\$0 sum for the current calendar year)
 - b. Total amount of any prepayment would be \$0
 - c. REG balance for Gross Receipts tax with the Department of Revenue is \$0
 - d. An estimation of 2002 gross receipts tax is \$0 Please reference Appendix #3 for past gross receipts filings.
- 6. REG has no outstanding tax issues with the Pennsylvania Department of Revenue

- 7 REG has no open issues regarding contracts, agreements or other arrangements with any other party under our license which affect or may affect the flow of electricity generation at retail
- 8. Regarding issues which may create a claim on the bond or other security which REG maintains for license:
 - a. REG has no outstanding or potential customer claims relating to REG bond
 - b. REG maintains no outstanding or potential issues with any Independent System Operator, Regional Transmission Organization or similar entity involved in the Pennsylvania retail electricity Market relating to potential bond claims
 - c. REG maintains no outstanding or potential issues with any entity that provides REG with electricity on the wholesale market, since no entity provides or has ever provided REG with electricity
- 9. REG's current \$250,000 bond level is comprised of 5-\$50,000 bonds. The current annual fee is \$2,000, but is expected to rise for this renewal, due to the national financial turmoil of this past year. For the same reason, the bond underwriter has requested substantial additional financial data before approving the bond. If we must maintain this bonding level, we will need to dedicate personnel to this task as well as seek the assistance of personnel from all five companies linked to the 5-\$50,000 bonds. To put the bond cost in perspective, the past year's fee for our bond exceeded 1% of our gross business income for 2001.
- 10. We have a quote of \$100 for the annual fee for the proposed bonding level of \$10,000. Alternatively, we may be able to obtain a bank guarantee instead for less. This lower bonding level obviously has much less financial impact on REG, and the resulting financial burden is somewhat closer to being proportional to the larger EGSs' cost burden for the \$250,000 bond level they carry. This is also more proportional to the risk burden REG faces compared to a larger EGS that actually takes title to electricity and has a gross receipts tax obligation.
- 11.REG is compensated directly by its clients based on a yearly consulting fee. This fee is based on the client's total electric consumption per year. No fees are ever added to the kWh price billed by an EGS to our clients.
- 12. First, the services we provide to our clients, strictly speaking, would not now require an EGS license, the way we understand the interpretation of the regulations from PUC staff. However, when REG decided to apply for the license in 1998, this interpretation was not clear. REG and PUC staff agreed it was prudent to proceed with license application, choosing to err on the safe side of the regulations. In retrospect, having the license adds credibility to the REG consulting process, and REG desires to maintain it.

In fact, in the early stages of our application, one EGS began telling prospective REG clients that REG did not have a license, shouldn't be operating in the deregulation arena without one, and refused to provide pricing to REG for clients. At that point, whether required or not, having an EGS license became imperative for REG to maintain credibility in the marketplace.

REG has always been, and will continue to be, a "non-traditional" marketer (please reference the "non-traditional" marketer status which exists in the natural gas utility industry). Under current PUC regulations and requirements, no other category exists for a "niche" consulting/marketing firm which champions and facilitates electric deregulation for the end user in PA. As a non-traditional provider of this valuable service to electric consumers in PA, REG has been able to make deregulation work for over 150 diverse industrial and commercial end users who have nearly 500 electric accounts in PA, and who are right now saving over \$1.7 million/year collectively with contracts currently in place. More detail on the services REG provides is included in the preceding letter text, and in Appendix 4, "REG Services" and "REAP Members."

13 Requiring REG to maintain a \$250,000 bond level puts REG at a competitive disadvantage to other non-traditional marketers who have been granted \$10,000 bond levels (Parente and Affiliated Power Purchasers...see "Precedent" topic in preceding letter), as well as the many non-traditional marketers who have not elected to seek a license. It would also appear to be unfair discrimination of REG against other non-traditional marketers as well as conventional EGSs who actually have or have the potential to have Gross Receipts Tax obligations.

Other pertinent information is included in the text of our preceding letter.

14. For ALL of the above questions, answers were provided by Frank J. Richards, President.

Frank J. Richards, P.E. 11/8/02

Appendix 2

Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of

The Richards' Energy Group for petition:

For reduction of Security Bond Level

Docket No.

Supplier License # A-110072

Certification of Service

I hereby certify that I have this day served a true copy of the foregoing Application of The Richards' Energy Group for petition of reduction of Security Bond Level for Supplier License A110072 upon the following by United States First Class Main:

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

Carol Pennington
Office of Small Business Advocate
Commercial Building Suite 1102
300 North Second Street
Harrisburg, PA 17101

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

Commonwealth of Pennsylvania Department of Revenue Bureau of Corporation Taxes Harrisburg, PA 17128-0946

Frank Nadoiny, GM Regulatory Affairs Unit Duquesne Light Company 411 Seventh Street PO Box 1930 Pittsburgh, PA 15230-1930 Thomas Hill
VP & Controller
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

John Litz, Division Controller UGI Utilities, Inc. Electric Division 400 Stewart Rd. PO Box 3200 Hanover Industrial Estates Wilkes-Barre, PA 18773-3200

Paul E. Russell, Assoc General Counsel Pennsylvania Power & Light Company 2 North 9th Street Allentown, PA 18108-1179

David Luff First Energy Corporation 76 South Main St Akron, OH 44308

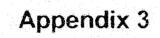
John L. Munsch Allegheny Power 800 Cabin Hill Drive Greensburg, PA 15601-1689

Dated this day of November, 20

Frank J. Richards, President The Richards' Energy Group 1325 Crown Vetch Drive Landisville, PA 17538

(P) (717) 898-6330 (F) (717) 898-6331

frichards@richardsenergy.com



License/Certificate No. Require. 110072 QUARTERLY 1	If Pro of Last Resort check here
Pennsylvania Gros	ss Receipts ¹
Name of Company The Richards' Energy Gro	quo
Period of Operation From July, 2002 (Month, Year)	toSeptember, 2002 (Month, Year)
Complete one Quarterly Gross Receipts Report for licensed or certificated by the Commission. This purposes. Please mark with an "X" the category	form may be photocopied for reporting
o Generator and supplier of electric power	
Municipal generator and supplier of elect (Only report on retail activity that has occ	
Electric Cooperative and supplier of elec (Only report on retail activity that has oc	
Broker/Marketer engaged in the business	of supplying electricity
(If collecting charges from PA licensed of interstate electric energy sales, check the total sales (kWh). No Gross Receipts are	"Sales for Resale" box below and report
Aggregator engaged in the business of su	applying electricity
(If collecting charges from PA licensed of interstate electric energy sales, check the total sales (kWh). No Gross Receipts are	"Sales for Resale" box below and report
CALENDAR YEAR:	CHECK APPROPRIATE BOX:
2002	☐ Retail Sales Report ! Sales for Resale0.0kWh
GROSS RECEIPTS (if applicable): \$	0.00

^{*}Gross receipt information is proprietary and will not be released to the public. Commission Order entered 7/20/00 at P-00991752. Confidential treatment of other information may also be requested. See Notice to Electricity Providers.

License/Certificate No Required A- 110072 QUARTERLY 1	If Provider of Last Resort check here
Pennsylvania Gros	s Receipts'
Name of CompanyThe Richards' Energy Gro	oup
Period of Operation From October, 2002(Month, Ye	ear) toDecember, 2002 (Month, Year)
Complete one Quarterly Gross Receipts Report for licensed or certificated by the Commission. This purposes. Please mark with an "X" the category	form may be photocopied for reporting
Generator and supplier of electric power	
Municipal generator and supplier of elect (Only report on retail activity that has occ	ric power curred outside of municipal boundaries)
Cl Electric Cooperative and supplier of electric Conly report on retail activity that has occur	
Broker/Marketer engaged in the business	of supplying electricity
(If collecting charges from PA licensed of interstate electric energy cales, check the total sales (kWh). No Gross Receipts are	"Sales for Resale" box below and report
Aggregator engaged in the business of su	ipplying electricity
(If collecting charges from PA licensed of interstate electric energy sales, check the total sales (kWh). No Gross Receipts are	"Sales for Resale" box below and report
CALENDAR YEAR:	CHECK APPROPRIATE BOX:
2002	ب Retail Sales Report - Sales for Resale 0.0 k
GROSS RECEIPTS (if applicable): 5	0.00

Gross receipt information is proprietary and will not be released to the public. Commission Order entered 7/20/00 at P-00991752. Confidential treatment of other information may also be requested. See Notice to Electricity Providers.





Mr. James McNulty Secretary PPUS P O. Box 3265 Harrisburg, PA 17105-3265

Dear Secretary McNulty

RE: Docket # L-00970129

Attached, as requested, are completed forms showing KWH sales and Gross Receipts. Since I operate an electric users group and do not take title to any electric power, the sales and gross receipts for the year are 0

Frank J. Richards President

Cc: Annuriciata Marino

. . .

Appendix 4

The Richards' Energy Group

www.richardsenergy.com



en·er·gin·eer'·ing, noun. 1. The process of applying sound engineering principles and extensive industry knowledge to discover energy opportunities, and resolve utility issues. 2. Often associated with using innovative concepts in a common-sense, cost-effective way.

The Richards' Energy Group (REG) is an independent "energineering" firm dedicated to cutting utility energy costs for industrial, commercial and institutional end users. We work for energy consumers, not suppliers, vendors or utilities. So our primary focus is to use our 60+ years of utility-related experience to minimize the electric and gas bills paid by our clients. Since we're unique, we had to create a word to describe what we do...energineering. Here's how we do it:

REAP: Richards Energy Affinity Program

REG has built a strong electric users' group, named REAP, for industrial and commercial businesses. It presently has over 150 members of varying sizes and types, and continues to grow. REAP's membership spectrum ranges from manufacturers, hospitals and retirement communities, to car dealers, restaurants and shoe stores. This diverse group has one thing in common—savings on electric bills...electric supply contracts put in place by REG have resulted in over \$5.2 million savings for REAP members since deregulation began in PA in 1999.

THE REAP PROCESS

Evaluation: REG evaluates your business' electric usage to determine projected savings, and whether you would benefit by joining REAP.

Membership: Based upon those projected savings your company joins REAP and becomes part of a block of businesses for which REG negotiates the best electric rates available. The annual membership fee is based on your total electric usage, but is never more than half your savings. REAP's design allows you to channel your energies toward your own area of expertise, for which your business is intended.

Shopping: REG acquires and assembles detailed load and billing data for each member, then collates the data to benefit each member. We solicit suppliers and evaluate their qualifications, request proposals, then select the best for the group. After contract terms are negotiated and approved by REG, contracts are executed between the supplier and member.

Follow-up: Once contracts are in place, REG selectively audits members' electric bills to ensure that contract terms are being met. REG keeps all members informed of various deregulation issues and developments. In addition, there is an annual REAP meeting for all members.

WHY REAP WORKS

Size: The REAP group keeps growing, with over 150 members who now collectively consume more than half a billion KWH of electricity each year, and consistently save money on their electric bills.

Strong Group: Since each member of the group gives REG the power to make purchase decisions for the group, suppliers can offer better pricing, knowing that they are bidding for all the accounts.

Data: Providing electric suppliers the maximum amount of load data in a consistent, professional format enables REG to obtain better rates for REAP members.

Qualified Professionals: REG has been approved by the PA PUC as a licensed electricity supplier. All of the hassle and details involved in bidding, evaluating, negotiating the contracts and pricing are handled by REG's credentialed professionals.

Focus and Independence: When you join REAP, you commit to shop with the group. Our members aren't testing the waters to see if a good rate might float to the surface. REAP was formed for the sole purpose of banding together diverse types of electrical loads, to reduce electricity rates for all members. REG is paid directly by REAP members through an annual fee, and is not beholden to any electric supplier.



The Richards' Energy Group

www.richardsenergy.com

REG Services

Utility Rate Analysis

- Perform billing audits and obtain credits
- Evaluate available alternative utility rate structures, including special or innovative rates
- Maximize business exemptions and incentives
- Implement savings through Emergency Voluntary Load Response Program

Facility Analysis

- · Perform walk-through energy audits
- Perform In-depth sales tax audits
- Prepare and file petitions for sales tax refunds
- Identify and evaluate alternative technologies for energy and cost efficiencies
- Allocate energy costs by department or area
- Evaluate demand-side management potential
- Power distribution expansion planning
- Determine cost effectiveness of a voltage change
- Investigate electric losses and voltage regulation within the facility
- Recommend electrical safety improvements

Installation Services

Install energy cost-saving projects

- Lighting retrofits
- Occupancy sensors
- HVAC Control improvements

Real-Time Metering Solutions

- Install FCC-licensed Wireless Router technology
- Obtain real-time data advantages inexpensively
- Provide utility-grade interval meter data
- Use data for shopping, facility analysis, demandside response and REAP
- Access data through the internet
- Evaluate data to cut costs

Training Courses

- Power Distribution: Fundamentals of electricity, safety, electrical equipment, maintenance, one-line diagrams, and National Electric Code
- Energy: Basics, heat loss, efficiency fue switching, rate structures and calculations
- <u>Deregulation</u>: History, future, how it works, how it should work, market power, re-regulation
- <u>Electricity Buying Groups</u>: Types, how to structure. market power, data requirements

REG: Who we are

REG, the Richards' Energy Group, was established in Landisville, PA in 1995. REG has been an approved electric supplier in PA since 1999, licensed by the Pennsylvania Public Utility Commission. REG also holds an FCC radio license for developing a wireless metering network covering most of eastern Pennsylvania.

Frank J. Richards, PE, CEP: President of REG, is a licensed, registered Professional Engineer, and a Certified Energy Procurement Professional. He has over 30 years' experience in the utility and energy field. Frank's memberships include the Association of Energy Engineers, the Institute of Electrical and Electronics Engrs, and the Netional Society of Professional Engrs.

Robert F. Abbato, PE, CEM: The Senior Energy Engineer associated with REG, Bob is a licensed, registered Professional Engineer (P.E.), and is a Certified Energy Manager (C.E.M.). In over 30 years' of electric utility experience, he has developed a vast knowledge of energy systems. He has been instrumental in performing detailed energy audits and developing accurate electric rate calculation spreadsheets to be sure REG clients are maximizing savings.

Charlie Goedken, PE: Our Business Development Manager, Charlie brings 20 years of experience as a Licensed Professional Engineer and entrepreneur. His easy-going style does not diminish his commitment to help businesses save energy dollars by developing partnerships with REG.

Mary S. Richards: Our energetic Office Manager, Mary's math degree makes her well-equipped to also handle our financials and interpret utility billing data

Julie DeFrank is our Director-Customer Care. She is our chief tiaison to our clients, public and press, and makes sure important details aren't overlooked.

Mike Frey is our Financial Manager, who also has developed an amazing talent for keeping track of and updating all the account and electric data we need for shopping and calculating accurate savings for each member.

Darren Epstein is our Field Manager, who is spearheading our real-time metering program, and has enabled us to enter a whole new dimension of serving our members, by actually implementing the energy improvements our studies recommend.



REAP Members

Description	Location	Annual KWH ndillon	% Load Factor	p meder
Printer	Mechanicsburg	79,15	65	В
Lancaster General, Heath Compus, Women &	Lancester Columbia			12.
a describerations de la contraction de	l arcaclar			1
				5
	Rheems		*****************	17
Milk & Ice Creem Production	Conestoge	21,65	70	3
			58	5
	Courtis	1935	50	5
Grocery Stores	York	19.32	79	8
Food MIR	Lencester	19.03	50	14
Deriry	Mersheim	11 89	58	B
Grocery Stores	LTatx	10.70	59	13
Dirmmer Switch Mitg.	Cooperaturg	10 44	46	8
Retrement Community	Lancaster	9 85	71	1
Powder Coating & Piping Milg.	Comp 103	9.20	60	10
Daby	Reading	7.79	. 54	5
. Querry	E. Petersturg	6 59	. 20	9
Grocery	Willow Street	6.00	59	4_
Retirement Community	New Holland	588	65	1 2
Retrament Community	Marheim	530	82	3
Retrement Community	Selersville	5.27	59	1
Entertalizment	Strasturg	5.24	51	6
	HomsternYork	524	14	9
Fgg Processing	Lintz	4.81	53	5
Retirement Community	Querryv#e	4.80	65	
Retrement Community	Lensdate	4.78	68	- 2
Retrement Community	Honey Brook	4.54	8.5	3
Bank .	Lancaster	4 30	56	1 2
Fabric Mg	Derwer	4.04	75	1 2
Produce	Dawa	4.00	75	7
Grocery Outlets	4	3.65	63	8
Turoine Manufacturer	York	3.35	59	
Motets/Restaurents	Bird-in-Hand	3 11	55	8
Speciatry Textes Mfg	Baby	3.00	63	1_1_
Motosc Rectaura da	-	-		11
Hyspital Wests Disposel				2
Rare-earth Magnet M/g.		2.95	55	1 1
Barts		294	73	1 1
Paving Material		2.97		8
				1 1
				1_1
مستوني والمستوالة والمستوادي والمستواد والمستواد والمستواد والمستواد والمستواد والمستواد والمستواد والمستواد والمستواد				5
	A CONTRACTOR OF THE PARTY OF TH			2
				-3
			T-1	-3
A COLUMN TO THE PROPERTY OF TH				7 5
artining for the factor of the foreign for the factor of t				3
A vita with a transmit that year any management personance of the best of the first paper of the property of the personal state of t			ļ	+
et deur bestellt der eine der Gestellt der er eine der der der der der der der der der de				1
	بمخفظ ليتبعث بمناحة فيقسونهم والمستحدث والا		+	
				2
نه معتصد باز باز بروسته و المناصلين و المناصلين المناصلين و برود و أن برود و بن المناصل المناصل المناصلة	- 		· · · · · · · · · · · · · · · · · · ·	1 1
and the control of th				+
Safeting and the second contraction and the seco			-	+
	the contract of the last of th		+	11-
			-	1-4
talian de la companya de la company				+ +
			-j-ii	
	}			
				1
ينتقد منين تنجيب ومنيسب أوسيته ومراه فلنشر ويعام والمناه والمناه والمناه والمناه والمارات والمناه والمساوا				+
~~~~ ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			•	
			,	
	7			1 - 3
	,		7	+ 7
				8
				
				1-1
			+	
				1
مستحد بالأدب أنتاب فينتفيه وفي ومصيد والتعاقب والتعاقب والمناب والمناب والمستحدد والمناب والمناب والتعاقب والتعاقب والتعاقب والمناب وا				
Motels	Carlsia	1.08	45	1 2
165 miles and 170 miles		1 107	1 10	5
Retirement Community			•	
Hardwaroffetsij	LIME	1.00	0	5
			58 54	2 2
	Printing Motorcycle Manufacturing Linicasie General, Health Computa, Women & Bethas, and Columbia Hospitals Microwave Tube Mig. Retirement Community Foed Mills Milk & Ice Creem Production Flexible Copper Wire Brass Ingol Production Grocery Stores Feed Mills Deiry Grocery Stores Ourner Switch Mig. Retirement Community Power Coating & Piping Mills, Dairy Custry Grocery Retirement Community Grocery Stores Resisuations & Bekery Retirement Community Grocery Stores Retirement Community Grocery Stores Grocery St	Prinking Medicrycle Marufaching York Lancashr General, Hediti Cempan, Women & Bestas, and Colarizon Hediti Retirement Community Excellentinems ### Alle A Ice Creem Production Flexible Cooper Winte Denvis ### Alle A Ice Creem Production Correctors ### Production Colarizon ### Concert Stores York ### Concert Stores York ### Cooper Stores York ### Cooper Stores York ### Cooper Stores York ### Cooper Stores Ustra ### Ustra ### Cooper Stores Ustra ### Ust	Printing Mechanicituring 79.15 Motorcycle Manufacturing York 78.39 Lasicactor Genesal, Hearth Cempus, Women & Lancaster Columbia Debtes, and Carintole Noticitude (19.15) Microwene Tube Mig Lencaster 95.26 Retitement Community Exhibit Nineers 23.00. Mikk & Ice Creem Production Connection 21.65 Provible Copper Wine Devices 19.35 Gaocery Stores York 19.32 Grocery Stores York 19.32 Grocery Stores Unit Lencaster 19.35 Crocery Stores Unit Lencaster 19.35 Crocery Stores Unit Lencaster 19.30 Debry Manchem 11.89 Crocery Stores Unit 19.70 Dimer Switch Mig Cooperatury 19.94 Retitement Community Lencaster 9.50 Debry Redough Propa Mig, Corny 17.3 Grocery Stores Unit Lencaster 9.50 Debry Redough Propa Mig, Corny 17.3 Grocery Stores 19.99 Grocery Willow Stores 6.00 Referenced Community Now Holderd 5.50 Referenced Community Selection 5.50 Referenced Community Selection 5.50 Referenced Community Selection 5.50 Referenced Community Selection 5.50 Referenced Community Lencaster 5.50 Referenced Community Selection 5.50 Referenced Community Selection 6.50 Referenced Community Lencaster 5.50 Referenced Community Selection 6.50 Referenced Community Selection 6.50 Referenced Community Lencaster 5.50 Refe	Description

REAP Members

			1 0		
REAP Member	Description	Location	Annual KWH million	K Load Factor	H Maten
ider Grap	Retrement Community	Mount Joy	1.06	50	3
nilips Oroup	Office Supplies	Heristurg	0.63	30	7
The state of the s	Printing	Lancaster	081	37	5
renovmen Prinéna	Dry Cleaner/Launary	Lancaster	010	28	19
leen Encepases				54	***************************************
und Capital Ford	Cer Deaka	Herristuro	0.70		1
onestogs Country Club	County Club	Lencester	0 69	43	
estion Motor tras Inc	Hotel	Certsio	0.66	63	1
rosspalas Managament	Health Care Management	Wectoracsburg	0.53	47	2
Vestbeld Motor kys	Hotel	Lericoster	0.65	55	2
dada Bosi	Bowling Larves	Machanicstung	0.52	58	1
recipies and the second of the	The state of the s	Cortste	0.60	38	2
ariste Sports Emportum	Geme/Sports Center				100
NU(rah Gioka Harvey	Honey/Borde Mfg	Lancaster	0.60		1.4
etalanore	Restaurante	Wormeysburg	0.59	40	2
emily Cupboard	Restourant	Intercourse	0.59	40	1
15/10/1 2000	Furniture Stone	(ancaster)	0.59	_ 37	1
	Uniform Rental	Lencoster	0 59	36	3
messe First	Food Was	Lebenon	054	23	2
lank hershey Ferris				•	+
Inician Publications	Bookstore	Camp Hit	0.54	38	 1 -
enc, Evergelical Free Church	Creen	Lurk	0.52	29	1_2_
bewart-Arnos Stoel	Mitg. Steel Products	Harrisburg	051	33	1_1_
rost/FCX Heath Cubs	Heath Cub	Herristurg	051	45	3
	The state of the s	Lancaster	050	38	1
IEW	Door Herowere/Tubing		950	40	3
edd Herriord Mators	Car Dealer	Lebanon		53	3
Ascherication Children's Home	Children's Home	Mechanicsburg	0.50		******
Joannew Laviers	Booking Lanux	Ekrabetiko-n	0.50	55	1 1
Jomit Peose & Lim Asso,	Cerdiologists	Wormeysburg	0 45	42	4
Hyro Avarta State Bank	Benk	Camp H0s	044	30	6
Tronvara Sale park	Commercial Property	Cartsio	044	48	5
Central PA Food Bara	Food Bank	Herisburg	0.43	48	1
قية المحمدة والدونية والمنظمة والمنظمة والمناطقة والمناطقة والمنظمة والمنظمة والمنطقة والمنطقة والمنطقة والمنطقة	and the second s				-
lovetry latig	Planter/Window Box Mfg	Lencestor	0.40	28	1-1-
Syste Farm Rost/Golf Cub	Restourent/Got Course	Mourn Joy	0.40	40	1 2
Vishoning Valley Cinemis	Movie Theater	Lenighton	0.40	46	2
encester Misson	Car Dealer	Lancastor	040	67	1_2
Sen May	Beverage Distributor	Lemoyne	040	52	1
الإيامية فيفوها معزمه بندو وسيتمها فانتها فيتما فينسب معاومة ووالتوميس	Restaurand	Harristony	039	50	1
Scott's Grill	Church	Lencaster	0.36	45	1 1
legisted Presbytesion Charch		منت بالإسانة للمنتمنية مستندية والمرتب والمستوا	0.33	25	2
FDL-USA	Break Line Mig.	Mount Joy		-	
Clark Electrice/Mechanical	Electricas/HVAC Contractor	Feredise	0.32	53	5
Red Crown Bowling	Bowing Lanes	Harntsbury	032	67	1 1
Vex	Office	Lancaster	0.32	34	1
Centisto Cement	Cement	Certiste	031	28	2
actor provides a summindade de la companya del companya de la companya del companya de la compan	Restourant	Harristurg	0.30	44	1
Mayerick Restaurent	والمتراب		0.25	29	2
RF Fager	Building Suppliers	Светер НОВ	-	-	+
ridicate Harness	Wring Harnesses	Shippercourg	0.28	38	
RT Grim	Automobile Clauges	Cemp His	0.27	28	1 1
Hernish	Office Building	Lancaster	0.26	38	2
Ednoors	Carpeting/flooring	Cartiste	0.25	.17	2
the same of the sa		Herrisburg	024	35	1
Dence Distributors	Distributor				+
Conesioga Log Cetins	Mig Log Cetiro	Leberion	024	20	
Castes Home Carter	Building Supplies	Cartisle	0.23	31	2
Troegs Brawing Co	Microbrewory	Hamsturd	021	38	1 1
Qualty Cleaners	Ciceners	Lernoyne	0.20	28	1
	Residurand	E Petersburg	0.20	40	1
Haydh Zugs Restaurers	Ive Stores	Camp HE	0 19	50	3
Fart Ferrey Tire		Camp Ha	0 13	27	
Cerno Hos Presbyserien Church	Charch				
Boriek Inaustries	Janforial Equipment	Mechanicsburg	0.17	59	1
Control Concepts	Control Mfg.	Phisturgh	0.16	25	1 1
Little Area Merinartia School	School	Little	0 15	22	1
Country Living Irin	Hotel	Lancastar	014	38	1
	Shoe Store	Lancaster	0.12	42	1
H B Shap	والمرابط فالمتنافظية بذوري والإنجاب فيستري والمواجهة والمتناون ووريس والمراب والمراب		0 12	16	+ +
Huggira Priviley	Printer	Harrisburg			
Marmeim Dove Christen Fellowship	(Charch	<u> </u>	0 11	39	1 1
Stowert-Array Eudement	Heavy Equipment Leading	Herristury	0 10	25	1
Immercial CAMA	Church	Mechanicsturg	0.10	14	2
Administrators & Consultants	Insurance Admirastratora	Lencaster	0 10	27	5
a right in the contract of the				722	1
Arrherst industries	Retrong Cars-refurbish		0 10		
Out Med Billiards	Billiand Parlor	Hantstvan	0.09	29	
Occupational Devt. Ceritor	Adult Vocational Program	Lengarior	0.07	23	
Landsvelle Memorite Church	Church	Lendsville	0.07	38	١.
	Plumbing Supply	Mechanicsturg	0.07	27	1
Coll Planting		Landroville	0.06	25	1
Wayside Presbylorian Ch	Cura		فتحبث ومتنعه ومنبسب		
the company of the co	Band Shoe Mrg	Loberton	0.05		3
Up front Footwer		the state of the s	I none	19	1 1
Triscari Productions	Video Productions	Cemp Hil	0.05		
	Video Productions Church	Camo HII	0.04	19	1 :

COMMONWEALTH OF PENNSYLVANIA

DATE:

November 15, 2002

SUBJECT:

A-110072

TO:

Bureau of Fixed Utility Services

FROM:

James J. McNulty, Secretary

DOCUMENT FOLDER

Petition of Richard's Energy Group for approval to Reduce Surety Bond Level

Attached please find a copy of a letter/petition of Richard's Energy Group, for approval of the reduction of its required bonding level to \$10,000.00.

This matter is being assigned to your Bureau for appropriate action.

Attachment

CC.

Law Bureau

ddt

10 CRETE 1