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April 7, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: Stand Energy Corporation, Docket No. A-125103; **RESPONSES TO
STAFF DATA REQUEST**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Response of Stand Energy Corporation to the Staff Data Request in the above-captioned matter.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Todd S. Stewart
Counsel for Stand Energy Corporation

TSS/jld
Enclosures
cc: Jeremy Haring (via email – jharing@pa.gov)

**RESPONSES OF STAND ENERGY CORPORATION
TO DATA REQUEST
OF THE STAFF**

Docket No. A-125103

1. Reference Pennsylvania Natural Gas Supplier Annual Report for Calendar Year 2020 – Licensee selected the box that states it “Takes title to the Natural Gas (Supplier or Aggregator)”. Please verify that licensee is operating as a supplier and is taking title to natural gas.

RESPONSE:

See attachment 1.

Provided By: John Dosker, General Counsel
Stand Energy Corporation

ATTACHMENT 1

AFFIDAVIT

Comes Now, Affiant John M. Dosker, General Counsel of Stand Energy Corporation, before me, a Notary Public for the State of Ohio, this 6th day of April, 2021, and having been first duly sworn and cautioned, Affiant states as follows:

1. I was responsible for assisting in the preparation and filing the Application of Stand Energy Corporation to the Public Utilities Commission of Pennsylvania to obtain a license to provide natural gas service. On August 8, 2001, Stand Energy Corporation made application to the Department of State of the Commonwealth of Pennsylvania for a Certificate of Authority to do business in Pennsylvania under the provisions of the Pennsylvania Business Corporation Law of 1988.

2. The original application was filed on September 21, 2001 with (8) copies of the application, a computer disk containing the application and a check for \$350. The case was assigned the PUC Docket No. A-125103. Stand Energy stated that upon the approval of the Application, it proposed to provide natural gas supply services to industrial customers in the service territories of Columbia Gas of Pennsylvania and Dominion Peoples. (Bradford and Tioga Counties, PA).

3. On Application Item No. 8, (Page 5 of the PUC Application), Stand Energy was asked to select the box that describes its Proposed Operations. Stand Energy checked ***“Broker/Marketer engaged in the business of supplying natural gas services.”*** The other possible selection was, ***“supplier of natural gas services”*** but we believed that option described the function of an LDC, so it was not selected. Stand Energy further indicated in Item No. 9 (Page 6 of the PUC Application) it intended to ***“provide natural gas commodity sales service; volume management”***. Stand Energy checked only ***“industrial customers”*** in item No. 11 at the bottom of Page 6.

4. On September 25, 2002 – the PA PUC issued a ***“Gas Supplier License”*** in Docket No. A-125103, authorizing Stand Energy, ***“to begin to offer, render, furnish or supply natural gas supply services to large Commercial and Industrial customers within the service territories of Columbia Gas of Pennsylvania and, Dominion Peoples.”*** License Issued.

5. At all times relevant hereto, it was the initial intention of Stand Energy to obtain a license to serve industrial customers. The Energy Information Agency (EIA) of the Department of Energy (DOE) still defines a “Marketer” of Natural Gas as, ***“A company that arranges purchases and sales of natural gas. Unlike pipeline companies or local distribution companies, a marketer does not own physical assets commonly used in the supply of natural gas, such as pipelines or storage fields.”*** The Pennsylvania Application did not have any kind of reference guide to assist companies in completing the application. We relied upon and utilized industry standard descriptions of gas market participants at that time.

6. Once licensed, Stand Energy Corporation became liable for the annual assessment from the PUC against Gas Suppliers, by invoice, in September of each year. The assessment is determined by a formula multiplying the entity's reported revenue for the past July 1 – June 30th times a decimal number computed by the PUC.

7. On August 13, 2003 Stand Energy sent a letter request to the Commission to amend its license to authorize Stand Energy to provide natural gas supply services to large commercial and industrial customers in the service territories of Columbia Gas of Pennsylvania, Dominion Peoples and Equitable Gas Company.

8. On September 8, 2003 – The PA PUC approved by Secretarial Letter the modification of Stand Energy's license to authorize it to provide natural gas supply services to large commercial and industrial customers in the service territories of Columbia Gas of Pennsylvania, Dominion Peoples and Equitable Gas Company. License Amended.

9. By Letter to the Commission dated March 19, 2007, Stand Energy requested the Commission to make appropriate changes to Stand Energy Corporation's "Gas Supplier Information" to include the award of the original license and the change approved on September 8, 2003. (See, Attached Exhibit A and USPS Delivery Receipt). The Amended information for Stand Energy Corporation has never been updated on the website.

10. On July 17, 2008, Stand Energy sent a request to the Commission to amend its natural gas supplier license to add the service territory of National Fuel Gas Distribution Corporation.

11. On August 21, 2008 PA PUC issued order that a license be issued authorizing Stand Energy to begin to offer, render, furnish or supply natural gas supply services to the public in the additional local distribution company service territory of the National Fuel Gas Distribution Corporation. License Amended.

12. On July 18, 2013 Stand Energy sent a request to amend its natural gas supplier license to add the service territory of Peoples TWP LLC.

13. On August 21, 2013 Stand sent a follow-up request to modify its license to add the service territory of Peoples TWP, LLC and to obtain permission to serve Governmental accounts in all of the service territories it is authorized to serve.

14. On August 29, 2013 the PA PUC issued an order that a license be issued authorizing Stand Energy Corporation to begin to offer, render, furnish or supply natural gas supply services to small commercial (under 6,000 MCF) , large commercial (6,000 MCF and over), industrial and governmental customers in the local natural gas distribution company service territories of Columbia Gas of Pennsylvania, Inc., Equitable Gas Company, National Fuel Gas Distribution Corporation, Peoples Natural Gas Company LLC and Peoples TWP LLC.

15. Stand Energy Corporation has endeavored at all times to comply with the requirements of the Pennsylvania PUC. Stand Energy has always sought Commission approval before changing the nature or scope of service in the Commonwealth of Pennsylvania. Stand Energy has always promptly paid, on or before the due date, any assessment from the Commonwealth. Stand Energy has endeavored to be a model corporate citizen in Pennsylvania.

16. Stand Energy's response to the Data Request sent by the Pennsylvania PUC is that at all times relevant to Pennsylvania, from the first application filing with the PUC to the present, Stand Energy Corporation has been operating as a supplier in Pennsylvania which includes taking title to all natural gas sold in Pennsylvania.

I, John M. Dosker, General Counsel of Stand Energy Corporation, 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).

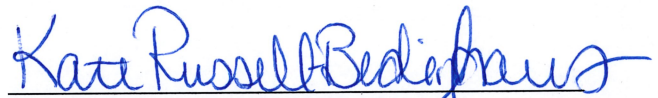
17. Further, Affiant sayeth naught.



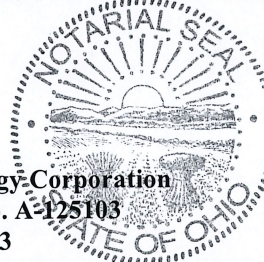
John M. Dosker

**STATE OF OHIO
COUNTY OF HAMILTON**

Before Me, a Notary Public for the State of Ohio came Affiant John M. Dosker, known to me personally, appeared on April 7, 2021 and signed the foregoing Affidavit as his free and voluntary act and deed. My Notary has no expiration date.



KATE RUSSELL-BEDINGHAUS



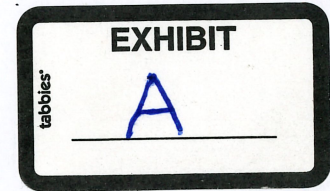
KATE E.
RUSSELL-BEDINGHAUS
Attorney At Law
NOTARY PUBLIC
STATE OF OHIO
My Commission Has
No Expiration Date
Section 147.03 O.R.C.



SEC

STAND ENERGY CORPORATION

1077 Celestial Street • Rookwood Bldg. • Suite 110
Cincinnati, Ohio 45202-1629
(513) 621-1113
(800) 598-2046
(513) 621-3773 Fax



March 19, 2007

James F. McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

VIA USPS PRIORITY MAIL

**Re: Request To Update Information on PA PUC Website
License No. A-125103: Issued 9/25/2002 Amended 9/8/2003**

Dear Secretary McNulty:



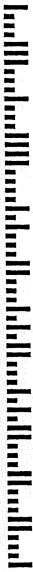
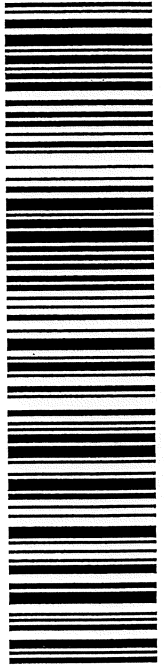
In 2003, pursuant to 52 Pennsylvania Code §62.105, Stand Energy Corporation gave notice to, and filed a request with, the Pennsylvania Public Utility Commission for approval to expand its license (No. A-125103) to include large commercial customers, and to include an additional local distribution company in Pennsylvania.

That amended license application was granted by Secretarial Letter dated September 8, 2003, amending Stand Energy Corporation's license in Pennsylvania to: *"large commercial and industrial customers behind the local distributions companies of Columbia Gas of Pennsylvania, Dominion Peoples and Equitable Gas Company in the Commonwealth of Pennsylvania."*

We respectfully request the Secretary make conforming changes to Stand Energy Corporation's information on the Pennsylvania PUC website under "Gas Supplier Information." The amended information for Stand Energy Corporation has never been updated on the website. Thank You.

Sincerely,

John M. Dosker
General Counsel

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3. Adhere your label to the package. A self-adhesive label is recommended. If tape or glue is used, **DO NOT TAPE OVER BARCODE.** Be sure all edges are secure.
4. Affix Priority Mail postage to your label or take to a Post Office™.
5. Stamped packages weighing 16 ounces or more may not be placed in USPS collection boxes.
6. Mail your package on the "Ship Date" you selected when creating this label.

Online Label Record (Label 1 of 1)

Delivery Confirmation™ Number:
0103 8555 7499 9409 8646

Not Paid Online

Print Date:	03/19/2007	Priority Mail® Postage:	<u> </u>
Ship Date:	03/19/2007	Total:	\$4.05
Weight:	0 lb 11 oz		

From: JOHN M. DOSKER
 STAND ENERGY CORPORATION
 SUITE 110
 1077 CELESTIAL STREET
 CINCINNATI OH 45202-1629

To: JAMES F. MCNULTY
 PENNSYLVANIA PUC
 PO BOX 3265
 HARRISBURG PA 17105-3265

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