

April 11, 2014

L-00070184

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

APR 10 2014

RECEIVED

Pennsylvania Public Utility Commission
Bureau of Technical Utility Services
Commonwealth Keystone Building
400 North Street, Third Floor
Harrisburg, PA 17120

Re: Nordic Energy Services, LLC
Form 4 and Form 5 Submission
Request for Confidential Treatment of Information

Dear Sir or Madam:

Enclosed is one original, including both a confidential and public version, of Nordic Energy Services, LLC's Form 4 (Retail Electricity Choice Activity Report: EGS Survey; Residential) and Form 5 (Retail Electricity Choice Activity Report: EGS Survey; Non-Residential). One of these versions has confidential data expurgated, and the other is unexpurgated and marked as "CONFIDENTIAL." Nordic requests that the expurgated data be given confidential treatment by the Commission and be excluded from information made available to the public.

The information included in the Retail Electricity Choice Activity Report is, in Nordic's opinion, highly sensitive, confidential, trade secret and proprietary information. It is appropriate to protect such information from disclosure. This information can be used to determine market share and the success of a product, based upon the number of customers buying the product. Nordic does not disclose this information to any person or entity in the public domain.

The information is privileged and confidential commercial information, the disclosure of which to competitors or potential competitors would cause competitive harm to Nordic. Included in the information is financial data that is on its face confidential, and also could be used to derive confidential trade information and market sensitive information regarding Nordic's provision of services to customers in Pennsylvania.

The electric service industry is highly competitive. The information provided by Nordic can be used by Nordic's competitors, or others, to determine Nordic's market share, sales success, product-line success, and business structure. This information is not publicly available, and it is not information Nordic would willingly share with its competitors. Market share information is highly sensitive.

Once Nordic's competitors become aware of Nordic's market share, sales success, product-line success, and business structure, those competitors would be able to adjust their marketing strategies to respond to competition from Nordic. Competition is good, but unfair competition is not. Utilizing confidential financial data, sales volumes and market share data to a competitor's detriment is not fair. In the end, any such unfair competition will result in fewer providers, which means less competition. When there is less competition, the few remaining competitors have a greater ability to raise prices. Nordic is of the opinion that disclosure of its highly sensitive, confidential, trade secret and proprietary information will not only be detrimental to Nordic and its competitive well-being, but ultimately to customers as well if a lack of competition results in price increases. No public interest would be served by the disclosure of the information submitted by Nordic.

This is precisely the information which Pa. Code §5.365 (52 Pa. Code §5.365) is intended to protect. Further, the Pennsylvania Right to Know Law defines "confidential proprietary information" as "[c]ommercial or financial information received by an agency . . . (1) which is privileged or confidential; and (2) the disclosure of which would cause substantial harm to the competitive position of the person that submitted the information." (See Ch. 1, Section 102). Records that constitute or reveal a trade secret or confidential proprietary information are excluded from disclosure. (See Ch. 7, Section 708(b) (11)). Nordic's information falls within the definition of "confidential and proprietary information" and information excepted under the Right to Know Law.

If you require any additional information, please feel free to contact me.

Sincerely,



Kelli Singer
Director of Operations
Nordic Energy Services, LLC

Form 4. Pennsylvania Retail Electricity Choice Activity Report: Electric Generation Supplier (EGS) Survey
Reported on a Statewide Basis: Residential
EGS Name: NORDIC ENERGY SERVICES, LLC
Reporting Period Date: CALENDAR YEAR 2013
REDACTED

Data from EGS	Residential Totals
1. Total Number of Customer Accounts Served §54.203 (a)(4)(i)	REDACTED
2. Number of Customer Accounts- Flat Rate* §54.203 (a)(4)(ii)	REDACTED
3. Number of Customer Accounts- Seasonal Rates* §54.203 (a)(4)(iii)	REDACTED
Seasonal rates differ in summer/non-summer.	
4. Number of Customer Accounts- Time of Use Rates* §54.203 (a)(4)(iv)	REDACTED
A retail customer account that is charged a rate that changes at different times of the day or night, or at different times during a 24 hour period or 7 day period but not as frequently as each hour to reflect the costs of serving the customer during different time periods.	
5. Number of Customer Accounts-Hybrid Rate Schedule* §54.203 (a)(4)(v)	REDACTED
Includes any pricing arrangement which incorporates hourly rates and block rates.	
6. Number of Customer Accounts-Other Categories*	REDACTED
(Do not include Customers in #2-5 or #8.) Please Specify:	
7a. Number of Customer Accounts in #2-6 on 1 year fixed term contract §54.203 (a)(4)(vi)	REDACTED
7b. Number of Customer Accounts in #2-6 on 2 year fixed term contract	REDACTED
7c. Number of Customer Accounts in #2-6 on 3 year fixed term contract	REDACTED
8. Number of Customer Accounts- Hourly/Real Time Rates* §54.203 (a)(4)(xi)	REDACTED
Includes any pricing arrangement based on hourly or daily energy prices. Example: LMP based rate or rate based on prior-day announced price.	
9a. Number of Customer Accounts-Mandatory Curtailable §54.203 (a)(4)(viii)	REDACTED
9b. Number of Customer Accounts-Voluntary Curtailable §54.203 (a)(4)(ix)	REDACTED
10. Number of Customer Accounts- Green Power §54.203 (a)(4)(vii)	REDACTED
Defined as electric supply that has been promoted as having greater than required renewable content & exceeds existing minimum renewable content requirements for retail power. Products offered to customer when customer requests specialized service.	
11. Number of Customer Accounts-Supplier Billing §54.203 (a)(4)(x)	REDACTED
Includes all customers who are not billed by the utility for the supplier's services. Includes customers billed by a billing service other than the utility.	
12. Number of Customer Accounts- Auto Payment §54.203 (a)(4)(x)	REDACTED
Includes customers indicated in #11 who are billed automatically on credit cards or other automatic payment arrangement. (i.e. bank transfer)	
13. Number of Customer Accounts- Budget Billing §54.203 (a)(4)(x)	REDACTED

* Do Not Include A Customer Under More Than 1 Rate Schedule in #2-6 & 8.

Note: Items # 7a,b,c-- Number of fixed term customer accounts by length of the original primary contract, specifying length in number of years.

**Form 5. Pennsylvania Retail Electricity Choice Activity Report: Electric Generation Supplier (EGS) Survey
Reported on a Statewide Basis: Small, Medium & Large Non-Residential Classifications**

EGS Name: NORDIC ENERGY SERVICES, LLC

Reporting Period Date: CALENDAR YEAR 2013

Data from EGS: REDACTED	Small	Medium	Large	Total
	Non-Residential	Non-Residential	Non-Residential	
1. Total Number of Customer Accounts Served §54.203 (a)(4)(i)	REDACTED	REDACTED	REDACTED	REDACTED
2. Number of Customer Accounts- Flat Rate* §54.203 (a)(4)(ii)	REDACTED	REDACTED	REDACTED	REDACTED
3. Number of Customer Accounts- Seasonal Rates* §54.203 (a)(4)(iii)	REDACTED	REDACTED	REDACTED	REDACTED
Seasonal rates differ in summer/non-summer.				
4. Number of Customer Accounts- Time of Use Rates* §54.203 (a)(4)(iv)	REDACTED	REDACTED	REDACTED	REDACTED
A retail customer account that is charged a rate that changes at different times of the day or night, or at different times during a 24 hour period or 7 day period but not as frequently as each hour to reflect the costs of serving the customer during different time periods.				
5. Number of Customer Accounts-Hybrid Rate Schedule* §54.203 (a)(4)(v)	REDACTED	REDACTED	REDACTED	REDACTED
Includes any pricing arrangement which incorporates hourly rates and block rates.				
6. Number of Customer Accounts-Other Categories*	REDACTED	REDACTED	REDACTED	REDACTED
(Do not include Customers in #2-5 or #8.) Please Specify:				
7a. Number of Customer Accounts in #2-6 on 1 year fixed term contract	REDACTED	REDACTED	REDACTED	REDACTED
7b. Number of Customer Accounts in #2-6 on 2 year fixed term contract	REDACTED	REDACTED	REDACTED	REDACTED
7c. Number of Customer Accounts in #2-6 on 3 year fixed term contract	REDACTED	REDACTED	REDACTED	REDACTED
8. Number of Customer Accounts- Hourly/Real Time Rates* §54.203 (a)(4)(xi)	REDACTED	REDACTED	REDACTED	REDACTED
Includes any pricing arrangement based on hourly or daily energy prices. Example: LMP based rate or rate based on prior-day announced price.				
9a. Number of Customer Accounts-Mandatory Curtailable §54.203 (a)(4)(viii)	REDACTED	REDACTED	REDACTED	REDACTED
9b. Number of Customer Accounts-Voluntary Curtailable §54.203 (a)(4)(ix)	REDACTED	REDACTED	REDACTED	REDACTED
10. Number of Customer Accounts- Green Power §54.203 (a)(4)(vii)	REDACTED	REDACTED	REDACTED	REDACTED
Defined as electric supply that has been promoted as having greater than required renewable content & exceeds existing minimum renewable content requirements for retail power. Products offered to customer when customer requests specialized service.				
11. Number of Customer Accounts-Supplier Billing §54.203 (a)(4)(x)	REDACTED	REDACTED	REDACTED	REDACTED
Includes all customers who are not billed by the utility for the supplier's services. Includes customers billed by a billing service other than the utility.				
12. Number of Customer Accounts- Auto Payment §54.203 (a)(4)(x)	REDACTED	REDACTED	REDACTED	REDACTED
Includes customers indicated in #11 who are billed automatically on credit cards or other automatic payment arrangement. (i.e. bank transfer)				
13. Number of Customer Accounts- Budget Billing §54.203 (a)(4)(x)	REDACTED	REDACTED	REDACTED	REDACTED

* Do Not Include A Customer Under More Than 1 Rate Schedule in #2-6 & 8.

Note: Items # 7a,b,c-- Number of fixed term customer accounts by length of the original primary contract, specifying length in number of years.

Form 5 Attachment

Classification Definitions

Classifications	Criteria for Inclusion in Classification
Small Non-Residential	0 to 120,450 kWh annual usage (25 kW * %55 load factor * 8760 hours in the year)
Medium Non-Residential	120,451 to 2,409,000 kWh annual usage (500kW * 55%load factor * 8760 hours in the year)
Large Non-Residential	2,409,001 kWh annual usage and greater

From: (630) 321-0888
Amy Cutlan
NORDIC ENERGY SERVICES LLC
One Tower Lane
Suite 300
OAKBROOK TERRACE, IL 60181

Origin ID: ENLA

FedEx
Express



J14101402070326

Ship Date: 10APR14
ActWgt: 0.8 LB
CAD: 4100196/INET3490

Delivery Address Bar Code



SHIP TO: (000) 000-0000

BILL SENDER

Secretary's Bureau
Pennsylvania Public Utility Comm.
400 NORTH ST
COMMONWEALTH KEYSTONE BUILDING
HARRISBURG, PA 17120

Ref #
Invoice #
PO #
Dept #

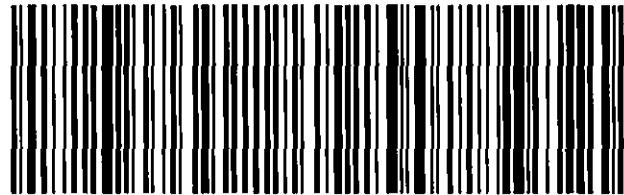
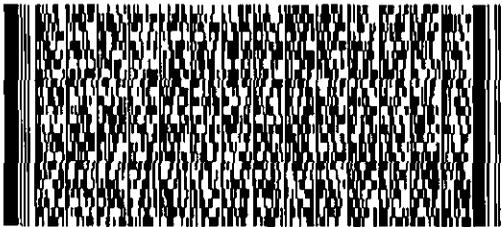
FRI - 11 APR AA
STANDARD OVERNIGHT

TRK# 7985 0809 9936

0201

17120
PA-US
MDT

XH MDTA



522G178D9/F220

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional charges to your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, and file a claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide limits, see current FedEx Service Guide.

RECEIVED

APR 10 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU