



ph:1-800-296-2203 email: hello@kratosgp.com  
225 Union Blvd Ste 200 Lakewood, CO 80288

January 17, 2014

Via E-Docket

Ms. Mary Jo Kunkle  
Executive Secretary  
Michigan Public Service Commission  
6545 Mercantile Way  
Lansing, MI 48911

**Re: Kratos Gas and Power's Alternative Gas Supplier License Application**  
**Case No. U17526**

Dear Ms. Kunkle,

Attached for paperless electronic filing in the above-referenced case is an Application for License as an Alternative Gas Supplier submitted on behalf of United Energy Trading, LLC d/b/a Kratos Gas and Power. The required financial data and risk management policies are considered confidential and have been provided under separate cover, in hard copy format only.

Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael Huggins", with a long horizontal flourish extending to the right.

Michael Huggins  
Managing Director  
United Energy Trading, LLC d/b/a Kratos Gas and Power  
Phone: (720) 897-4746  
Facsimile: (303) 991-0984  
Email: [mhuggins@uetllc.com](mailto:mhuggins@uetllc.com)

**ALTERNATIVE GAS SUPPLIER APPLICATION  
FOR THE MICHIGAN PUBLIC SERVICE COMMISSION  
RETAIL ACCESS PARTICIPATION AGREEMENT**

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Public Act 634 of 2002 (Act 634), MCL 460.9 et seq., which became effective on December 23, 2002, requires an Alternative Gas Supplier (AGS) selling natural gas at unregulated retail rates in Michigan to obtain a license from the Michigan Public Service Commission (Commission). Transportation gas customers are outside the retail choice program.

<http://www.legislature.mi.gov/documents/2001-2002/publicact/pdf/2002-PA-0634.pdf>

Section 9b of Public Act 634 states:

- (1) An alternative gas supplier shall not do business in this state without first receiving a license under this act.
- (2) An alternative gas supplier shall maintain an office within this state.
- (3) The Commission shall assure that an alternative gas supplier doing business in this state has the necessary financial, managerial, and technical capabilities and require the supplier to maintain records that the commission considers necessary.
- (4) The Commission shall require an alternative gas supplier to collect and remit to state and local units of government all applicable users, sales, and use taxes if the natural gas utility is not doing so on behalf of the supplier.

A license can be obtained by satisfactory completion of this application form referred to as the Retail Access Participation Agreement. Information must be supplied prior to processing a license request. All terms and conditions must be adhered to by applicant as a condition of maintaining a license. The applicant's signature on this form attests to the accuracy of the information submitted and commits applicant to adhere to the attached terms and conditions as set forth in the Commission's order in case U-11915.

Failure to provide accurate information on this form, to furnish any required supporting information including required affidavits or to comply with the attached terms and conditions can result in denial or revocation of a license.

After an AGS submits its application:

1. The Commission Staff (Staff) reviews the application and the AGS's Terms and Conditions Agreement submission and consults with any needed experts and the applicant before making a recommendation to the Commission for approval or non-approval of the license.
2. The Staff's review process time will vary depending on initial application contents, additional information requirements and necessary meetings with the applicant to validate proprietary documentation.
3. The Commission will issue an ex parte order approving the issuance of a license if it is satisfied that the application meets the licensing criteria.

**PART I – FITNESS**

<p>1. Name, Michigan office address, phone and fax numbers, e-mail address and company website:</p> <p>United Energy Trading, LLC dba Kratos Gas &amp; Power          Address: 701 Stickel Rd Gladwin, MI 48624          Phone: 989-709-5275 or 1-800-296-2203          Fax: 303-991-0988          Email: dhaueisen@uetllc.com          Website: www.kratosgp.com</p>	<p>6. Specify type of provider (utility, marketer, utility affiliate):</p> <p>Marketer</p>
<p>2. Name of contact person, phone number and e-mail address for this application process:</p> <p>Mike Huggins          Phone: 720-897-4746          Email: mhuggins@uetllc.com</p>	<p>7. Business affiliation (whether utility or other):</p> <p>Privately held North Dakota limited liability company</p>
<p>3. If principal place of business is outside Michigan, provide name, address, telephone number, and e-mail:</p> <p>United Energy Trading, LLC          225 Union Blvd., Suite 200          Lakewood, CO 80228          Phone: 1-800-296-2203          Email: hello@kratosgp.com</p>	<p>8. FERC authorization type(s) and number(s) if applicable:</p> <p>FERC authorization is not required</p>
<p>4. Name, telephone number and e-mail of 24-hour contact person for customers:</p> <p>Kratos Customer Service          Phone: 1-800-296-2203          Email: hello@kratosgp.com</p>	<p>9. Broker's name, address, telephone number, and e-mail (if applicable list all):</p> <p>N/A</p>
<p>5. Type of legal entity (Corporate, Limited Liability Company, Partnership, etc.):</p> <p>a) Date and State legal entity was organized:          September 11, 2002 – North Dakota</p> <p>b) Purpose for which the legal entity was organized:  <b>Limited Liability Company</b></p> <p>c) Please submit your certificate of Authority to Transact Business in MI (if Foreign Corp, LLC, LPC).</p> <p align="center"><b>See attached Exhibit A</b></p>	<p>10. Please list past or future planned name changes (if applicable):</p> <p>N/A</p>

11. State specifically whether the applicant, an affiliate or subsidiary of the applicant, or a predecessor in interest of the applicant, or an owner, shareholder, principal, officer, executive or director associated with the applicant ever:

- Misled a potential customer and thereby induced that potential customer to sign a contract; **No**
- Defaulted on a contract; **No**
- Did not abide by the terms of the contract; **No**
- Exited the market due to the imposition of any energy related penalties or finings; **No**
- Committed any violations of law or business ethics in connection with the provision of energy or energy-related products and services anywhere in the United States that resulted in a criminal or civil conviction or agreement to pay a penalty including any settlement imposed by a court or administrative agency? **No**

If the answer is yes to any of the above, please explain in detail. Subsequent violations must be disclosed within 30 days to the Michigan Public Service Commission.

12. **Please submit a separate legal affidavit**, signed by a corporate officer with proper authority, which shall attest to the competence of the company's employees to market natural gas as an AGS.

**See attached Exhibit B**

## **PART II – COMPLIANCE COMMITMENT**

A supplier must demonstrate that it has the necessary technical and managerial capabilities to ensure adequate service to customers in Michigan. Please provide a complete summary of information covering the applicant's:

1. Corporate/Company history with Biographies of Key Personnel (this may include experience as a supplier of retail energy, including natural gas or electricity);  
**See attached Exhibit C**
2. All service quality and reliability issues:
  - The total number of customer complaints;
  - Any and all violations or failures to perform on customer contracts, obligations to sell, serve or otherwise provide gas to customers by the applicant or any predecessor or affiliate entity;**See attached Exhibit D**
3. Audited financial statements of the applicant for its two most recent fiscal years or other documentation, by affidavit, providing detailed factual data pertaining to applicant's financial standing. Please submit financials under separate cover if considered confidential;  
**See attached Exhibit E (filed confidentially under separate cover)**
4. Please provide the means for the required \$100,000 bond or letter of credit to ensure adequate service to customers in Michigan. Draft language will be provided at a later date;  
**As demonstrated in the attached financial statements, Kratos Gas & Power has sufficient credit and/or capital to provide adequate assurance of performance.**
5. Overview of business plan including risk management strategy or policy;  
**See attached Exhibit F (filed confidentially under separate cover)**
6. Outline of staffing and procedures for responding to customer inquiries and customer complaints.  
**See attached Exhibit G**

**PART III - COMPLIANCE COMMITMENT**

By signing this application and providing the affidavit letter required in item 12 of this application, the applicant and its representatives (1) certify that the information provided herein is accurate and complete and (2) agree to abide by the provisions of this agreement including the Terms and Conditions for a Michigan alternative natural gas supplier.

Signature: 

Date: 1/17/14

Name and Title: MIKE HUGGINS MANAGING DIRECTOR

Date: 1/17/14

## **APPLICATION, SUBMISSION, AND LICENSE PROCESS:**

1. The application may be downloaded in PDF or Word format. Responses to Part I may be attached or the Part I items may be reformatted by expanding the application and inserting responses.
2. The compliance commitment must be signed and dated as indicated.
3. The Staff will contact you via email or phone to acknowledge receipt of application. The Staff also will notify you regarding any clarifications or needed additional materials. Once the Staff determines that the initial application materials are complete, the Staff will meet with principals of applicant to cover and discuss Application Part II information.
4. The financial information that is regarded as confidential will be archived at the Commission.
5. Upon completion of the application process, the Staff will make a recommendation to the Commission regarding the license. Granting of the license is by Commission order.

## **Terms and Conditions**

1. **Supplier contact information.** An AGS shall notify the Staff of any change in the AGS's name, corporate structure, Michigan address, telephone number, contact person or agent.
2. **Michigan office.** An AGS shall maintain a Michigan office. An AGS representative, toll free telephone number, e-mail address, and website must be made available at all times to enable customers to contact or make inquiry with the AGS.
3. **FERC authorization.** An AGS shall obtain any authorizations required by the FERC, including any authorization required by the FERC to become a natural gas retail marketer. An AGS shall notify the Staff within 30 days of any FERC determination regarding the AGS's provision of natural gas to retail customers.
4. **Business practices and ethics disclosure.** An AGS shall follow all state and federal laws, as well as Commission policies and practices that may be established. Violations of law or business ethics by an AGS, AGS's agent, affiliate or subsidiary of the applicant, or a predecessor in interest of the applicant, or an owner, shareholder, principal, officer, executive, or director associated with the applicant in connection with provision of energy or energy-related products or services anywhere in the United States that results in a conviction or acceptance of a penalty for said behavior must be disclosed to the Michigan Public Service Commission within 30 days of any conviction or penalty determined or imposed by a court or an administrative agency.
5. **Product/Service disclosures.** An AGS shall conform to all customer disclosure requirements set by the Commission under authority of Act 634.
6. **Product/Service marketing and contract practices.** An AGS shall ensure fair and truthful representation of all products or services provided under the gas customer choice program in Michigan.

7. **Customer enrollment and services.** Enrollment of customers in the Michigan retail access program shall strictly follow the procedures authorized by the Commission. Slamming (unauthorized switching) or cramming (unauthorized adding of additional products or services not requested by the customer) as outlined in subsections (2) and (4) of Act 634 constitute serious offenses in the enrollment process. An AGS shall not include or add products or services without authorization as outlined in Act 634 and shall conform to all state and federal laws and regulations regarding the retail sale of products and services.
8. **Termination of service to customer.** The delivery of natural gas is the sole province of the natural gas utility offering the gas customer choice program. Termination of service to a gas customer choice customer will be handled by the natural gas utility in conformity with all rules and procedures authorized by the Commission.
9. **Utility tariffs and rules of service.** AGSs shall comply with utility tariffs and rules of service established and authorized by the Commission or the FERC that are applicable to the AGS or its retail customers.
10. **Customer confidentiality.** Information obtained from a customer or a potential customer by an AGS or an agent of an AGS is to be held in strict confidence and shall not be disclosed unless disclosure of the information is necessary to service the customer or to verify the potential customer's credit information. In the event that a customer's or a potential customer's confidential information is disclosed to a third party for any purpose, the AGS shall ensure that the party to whom the information is disclosed is informed of the duty to maintain the confidentiality of such information in the future. Any other use of such confidential information is prohibited absent the express approval of the customer or potential customer. Solicitation for such approval shall not be commingled with other offers, contracts, or approvals.
11. **Customer data requests.** A customer shall have the right to obtain its own billing and natural gas consumption data that is in the possession of the AGS.
12. **Associated broker, aggregator, or marketer.** An AGS that relies on the services of brokers, aggregators, or marketers shall pledge a best faith effort to hold them in compliance with provisions of this agreement. AGSs shall supply the Staff with the address, telephone number, name of a contact, and business affiliation of any brokers, aggregators, or marketers used by the AGS.
13. **State taxes, fees and revenue collection.** An AGS shall collect and remit all applicable state taxes, fees, and charges levied on energy suppliers as a class of business providers, including those fees and charges established by the Commission to implement and enforce this program, unless the natural gas utility is doing so on behalf of the AGS.
14. **Reporting.** AGSs shall provide statistical data regarding their retail sales and wholesale transactions to the Commission and its Staff upon request. The books and records of an AGS shall be made available by the AGS so that the Commission and its Staff may verify the accuracy of the statistical data.

**Exhibit A**

Part I, Paragraph 5(C) –  
CERTIFICATE FOR AUTHORITY TO TRANSACT  
BUSINESS IN MICHIGAN

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF COMMERCIAL SERVICES

FILED

Date Received:

OCT 18 2012

(FOR BUREAU USE ONLY)

OCT 23 2012

This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.

by Administrator  
Bureau of Commercial Services

Tran Info: 1 18049381-1 10/15/12  
Chk#: 10456 Amt: \$50.00  
ID: UNITED ENERGY TRADING LLC

Name

United Energy Trading, LLC

Address

PO Box 837

City

State

Zip Code

Bismarck

ND

58502-0837

EFFECTIVE DATE:

D92107

Document will be returned to the name and address you enter above. If left blank document will be mailed to the registered office.

APPLICATION FOR CERTIFICATE OF AUTHORITY  
TO TRANSACT BUSINESS IN MICHIGAN

For use by Foreign Limited Liability Companies  
(Please read information and instructions on last page)

Pursuant to the provisions of Act 23, Public Acts of 1993, the undersigned limited liability company executes the following Application:

1. The name of the limited liability company is:

United Energy Trading, LLC

2. (Complete this item only if the limited liability company name in item 1 is not available for use in Michigan.)  
The assumed name of the limited liability company to be used in all its dealings with the Bureau and in the transaction of its business in Michigan is:

3. It is organized under the laws of North Dakota

The date of its organization is September 3, 2002

The duration of the limited liability company if other than perpetual is

4. The address of the office required to be maintained in the state of organization or, if not so required, the principal office of the limited liability company is:

919 South 7th St., Suite 405

(Street Address)

Bismarck

(City)

ND

(State)

58504

(ZIP Code)

5

5. a. The address of its registered office in Michigan is:

2214 Olympia Saint Helen, Michigan 48656  
(Street Address) (City) (ZIP Code)

b. The mailing address of the registered office if different than above:

\_\_\_\_\_, Michigan \_\_\_\_\_  
(Street Address or P.O. Box) (City) (ZIP Code)

c. The name of the resident agent at the registered office is:

Darci Haueisen

6. The Department is appointed the agent of the foreign limited liability company for service of process if no agent has been appointed, or if appointed, the agent's authority has been revoked, the agent has resigned, or the agent cannot be found or served through the exercise of reasonable diligence.

The name and address of a member or manager or other person to whom the administrator is to send copies of any process served on the administrator is: **(Must be different than agent shown in Item 5c)**

Loren R. Kopseng  
(Name)

919 South 7th St., Suite 405 Bismarck ND 58504  
(Street Address) (City) (State) (ZIP Code)

7. The specific business which the limited liability company is to transact in Michigan is as follows:

United Energy Trading, LLC is trader/marketer of natural gas.  
It is expected that sales of natural gas will be made in MI.  
There may also be purchases of natural gas.

The limited liability company is authorized to transact such business in the jurisdiction of its organization.

Signed this 5th day of October, 2012

By  \_\_\_\_\_  
(Signature)

Loren R. Kopseng CEO  
(Type or Print Name) (Type or Print Title)

# *State of North Dakota*

## SECRETARY OF STATE



### CERTIFICATE OF GOOD STANDING OF

UNITED ENERGY TRADING, LLC

The undersigned, as Secretary of State of the State of North Dakota, hereby certifies that UNITED ENERGY TRADING, LLC, a North Dakota LIMITED LIABILITY COMPANY, was issued a certificate of organization which was effective on September 3, 2002 and, according to the records of this office as of this date, has paid all fees due this office as required by North Dakota statutes governing a North Dakota LIMITED LIABILITY COMPANY.

ACCORDINGLY the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Good Standing to

UNITED ENERGY TRADING, LLC

Issued: October 04, 2012

A handwritten signature in cursive script, reading "Alvin Jaeger".

Alvin Jaeger  
Secretary of State

**Exhibit B**

Part I, Paragraph 12 –  
AFFIDAVIT OF MICHAEL HUGGINS



**Exhibit C**

Part II, Paragraph 1 –  
CORPORATE HISTORY AND BIOGRAPHIES OF KEY  
PERSONNEL

## **Corporate History**

Founded in 1984, United Energy Corporation (“UEC”; see [www.unitedenergycorp.com](http://www.unitedenergycorp.com)) started with one oil well and has leveraged that discovery into a fully integrated and diversified energy company. UEC primarily engages in the acquisition and development of oil and natural gas properties and participates in the wholesale buying and selling of natural gas and electricity and related transportation and transmission services throughout the United States and Canada.

UET ([www.unitedenergy.com](http://www.unitedenergy.com)), a subsidiary of UEC, is a fully integrated energy marketing and trading organization. UET is active in marketing natural gas and crude oil, as well as related transportation and transmission services, throughout the U.S. and Canada.

UET leverages its extensive experience maintaining transport, storage, production, and structured products to provide our retail natural gas customers the flexibility to meet their individual business needs as well as the dependability and savings they deserve. Under the trade names Blue Spruce Energy Services in California ([www.bluespruceenergy.com](http://www.bluespruceenergy.com)), and Kratos Gas and Power in Ohio and Georgia ([www.kratosgp.com](http://www.kratosgp.com)), UET has been successfully empowering its customers to save money by choosing UET as their natural gas supplier.

## **Biographies of Key Personnel**

### **Thomas Williams – President**

Tom Williams is the President at United Energy Trading. Tom took on scheduling and trading duties at Kinder Morgan where he was responsible for all sales and purchases on the Kansas/Nebraska system. Continuing at Wildhorse Energy Partners, Tom held the role of Director of Marketing and was responsible for all aspects of its gas trading business. Joining Tom Brown, Inc. Tom continued working as the Director of Marketing, responsible for managing Tom Brown's production, transport, storage, and marketing. Before founding United Energy Trading, Tom managed a proprietary book of business based in the Rockies, at first Millennium Gas Marketing, then Tegra Energy Services. As president of UET, Tom is responsible for all aspects of UET's trading and marketing activities including the growth and operations for 10 offices and roughly 70 employees.

### **Michael Huggins – Managing Director**

Mike Huggins is a Gas Marketing Representative at United Energy Trading. Mike joined UET in March 2009, his main focus is managing UET's Storage book. Mike is also part of a group whose focus is whole gas marketing in the Rockies West region. Mike graduated from the University of Illinois with a degree in statistics. Mike started his career in 1995 at Western Gas Resources as a Financial Analyst. Two years later, Mike began trading derivatives at Western. He became WGR's lead financial trader shortly thereafter trading Nymex, Basis, and Options, with a focus on the Rockies. In 2007, Mike was hired by High Sierra Energy as their risk officer. He went on to help create and manage High Sierra's wholesale gas marketing group.

### **Brian Potts – Gas Marketing Representative**

Brian Potts started his career in the energy industry in 2001 with Aquila Merchant Services in Kansas City, MO as a Gas Scheduler, and moved to Gas Trading within the year. He then joined Southwest Gas Corp in Las Vegas, NV as a Specialist in the Gas Purchases and Transportation division. In 2006, Brian joined United Energy Trading, LLC as a Natural Gas Marketer in the Rockies. Brian has scheduling and trading experience on gas pipelines and hubs throughout the Rockies, Pacific Northwest, Southwest, California, and AECO areas. Brian is a graduate of the University of Kansas, with a Bachelor of Arts degree in Psychology.

### **Serafin Barayazarra- Gas Marketing Representative**

Serafin started his career in the natural gas business in 1999 as a financial staff accountant with Western Gas Resources, Inc. where he was responsible for preparing the monthly financial reports for eight natural gas and liquid plants. In 2000, Serafin made the move from accounting to marketing as a financial analyst, where he was responsible for tracking the daily futures and derivative trading activities for WGR's corporate financial trading desk. In 2001, he made the move from the financial side of the business to the physical side as an Associate Gas Marketing Representative. His duties included providing analytical support to the physical gas marketing team. In 2005, Serafin joined WGR's gas marketing team where he was responsible for maximizing sales revenue for WGR's Rockies production as well as monetizing storage and transportation contracts in the Rockies region and in Canada. In 2007, Serafin left WGR/Anadarko to join High Sierra Energy, LLC in their efforts to start up a wholesale natural gas group. In the spring of 2009, Serafin left High Sierra Energy to join United Energy Trading, LLC where he trades in the West Coast and Rockies regions and helps optimize Canadian storage contracts.

### **Darci Hauelsen – Gas Marketing Representative**

Darci Hauelsen joined United Energy Trading in 2012 as a Gas Marketing Representative for retail and commercial/industrial accounts. She graduated from Western State College of Colorado in 2000 with a Bachelor of Arts degree in Business Administration as well as a Bachelor of Arts degree in Accounting with a Finance Emphasis. In 2001, Darci began her career in the natural gas industry at Western Gas Resources as a Portfolio Management Analyst. There she received her experience with derivatives on the financial side of the business. Then in 2006, she went to Kerr McGee (which later became Anadarko) and worked with the physical side, managing their commercial/industrial accounts in the Rockies. In 2010, she expanded her role and also traded wholesale gas for Anadarko's West Rockies Region.

### **Jared Ottoson - Scheduler**

Jared Ottoson is a Gas Scheduler at United Energy Trading. Jared began his career at UET in 2011 as a Natural Gas Marketing Analyst. In this role he developed skills in, among other areas, physical and financial position reporting for natural gas profit and loss, reporting natural gas storage valuation, and tracking and entering hedging positions. In addition, he gained expertise in the concepts and ideas involving transport and storage optimization. In 2012, Jared began scheduling natural gas on multiple pipelines throughout the United States. He has experience in all facets of scheduling, including: nominations, imbalance, transportation and storage. Jared graduated from the Monfort College of Business at the University of Northern Colorado. He has a Bachelor of Science in Business Administration with an emphasis in Accounting.

### **Stephen Shortell – Customer Service Representative**

Steve found his way to the oil and gas industry after spending over 10 years in financial services where he focused on serving the needs of individual customers. In 2011, he joined United Energy's risk group where he was responsible for ensuring accuracy in United Energy's accounts payable. As a dedicated Customer Service Representative, Steve is responsible for servicing the needs of United Energy's retail natural gas customers. Steve is committed to delivering the highest level of customer service to each and

every retail natural gas customer and ensuring their questions and concerns are addressed timely, professionally and to the customer's satisfaction. Steve holds a Bachelor of Science in Business Administration degree with a concentration in Finance from the University of Northern Colorado.

### **Dave Sandy – Manager of Accounting**

Dave Sandy is the Manager of Accounting for United Energy Trading. Dave oversees a staff of six that handles volume actualizing, invoicing, settlements, cash management, foreign exchange, imports, gross production taxes and sales tax reporting. Dave came to UET in August 2006 after a six year stint working for the State of North Dakota. Dave received his bachelor's degree in accounting from the University of North Dakota. The UET accounting office is headquartered in Bismarck, ND with its parent company, United Energy Corporation.

**Exhibit D**

Part II, Paragraph 2 –  
SERVICE AND RELIABILITY

United Energy Trading, LLC d/b/a Kratos Gas & Power strives to provide outstanding customer service and billing. Kratos has multiple representatives providing live customer service during normal business hours. Kratos strives to answer all customer inquiries during initial phone calls whenever possible and will follow up with customers within 24 hours if additional research is required. Most inquiries are resolved in this manner.

While Kratos attempts to resolve all customer issues promptly and to the satisfaction of the customer, a small percentage of customer inquiries result in customer complaints. While the nature of these complaints varies, most involve misunderstandings about signing up for service or billing confusion. To date, Kratos has had a total of 22 customer complaints since it began serving gas customers in 2010. This means that out of a total of approximately 26,250 customer inquiries, only .08% of those inquiries result in a complaint. All complaints are resolved according to state, PSC, and utility guidelines.

United Energy Trading, LLC d/b/a Kratos Gas & Power has not had any violations or failures to perform on customer contracts, obligations to sell, serve or otherwise provide gas to customers.

**Exhibit E**

Part II, Paragraph 3 –  
FINANCIAL STATEMENTS

**Financial Statements:**

This information has been filed under separate cover to protect confidentiality.

**Exhibit F**

Part II, Paragraph 5 –  
BUSINESS PLAN AND RISK POLICY

**Business Plan and Risk Policy:**

This information has been filed under separate cover to protect confidentiality.

**Exhibit G**

Part II, Paragraph 5 –  
OFFICE STAFFING AND PROCEDURES FOR  
RESPONDING TO CUSTOMER INQUIRIES AND  
COMPLAINTS

As explained above, UET has extensive experience in the retail natural gas business. UET currently operates retail books of business in California, Ohio and Georgia and has policies and procedures in place for responding to customer inquiries and complaints.

When a customer calls with an inquiry or a complaint, staff is instructed to:

- (1) Obtain information from the customer to access and verify the account or premises information;
- (2) Determine the nature of the inquiry and if the Utility or if UET is responsible for assisting the customer; and
- (3) Follow normal procedures for responding to inquiries. If the inquiry is specific to the Utility, staff will take one of the following actions:
  - a. Forward/transfer the inquiry to the responsible party;
  - b. Direct the customer to contact the responsible party; or
  - c. Contact the responsible party to resolve the matter and provide a prompt response to the customer.

In the event that a complaint is escalated, those calls are forwarded to Stephen Shortell in the Lakewood, Colorado office. Mr. Shortell will open a case by:

- (1) Verifying customer contact account information in UET's computer system;
- (2) Providing a description of the customer's complaint in the notes section of the system;
- (3) Resolving the issue internally, or, if necessary, contacting the appropriate regulatory authority and hopefully responding to the customer the same day; and
- (4) Closing the case or following up with the customer at a later date.

In the event that a customer calls with an emergency (meaning any communication from a customer concerning an emergency situation relating to the distribution system, including, but not limited to, reports of gas odor, natural disaster, downed wires, electrical contact, or fire):

- (1) Staff provides the distribution utility's emergency number to the customer for direct contact to the distribution utility and/or advises the customer to call 911.