Santanna
ENERGY SERVICES

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

ORIGINAL

Santanna Natural Gas Corporation Application for Licensure of Agents, Brokers and Consultants Under Section 16-115C of the Public Utilities Act.	: : : :	Docket Number 09-0597

February 25, 2010

Elizabeth A. Rolando, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Dear Ms. Rolando:

This cover letter and its accompanying attachments are in response to a notice sent to Gregory F. Rabaey at Santanna Natural Gas Corporation d.b.a. Santanna Energy Services regarding our application for an ABC license. The docket number is **09-0597**. Per the instructions of the ruling one copy of this response is to be served on Mr. Yoder, the Administrative Law Judge, and the second copy is to be served on Mr. Hickey of the Commission. This has been completed by electronic mail as of February 25th, 2010.

General Additional Information:
-Santanna Energy Services is not currently licensed as an Agent, Broker or Consultant in any other jurisdictions; similar to the licensing required under section 16-115C of the Illinois Public Utilities Act.
-Santanna Energy Services does not have any formal complaints filed against it for its provision of any services in the electric or gas industry in this or any other jurisdiction.

For 83 III Adm. Code 454.80 (a) for licensure as an ABC, Santanna Energy Services filed via hard copy, an original License or Permit Bond to the Chief Clerk of the Commission on February 16th, 2010. The permit bond has been issued by a qualifying surety, is in force for greater than one year, and is in the specified amount of $5000 in favor of the People of the State of Illinois. It is conditioned upon the full and faithful performance by Santanna Natural Gas Corporation d.b.a. Santanna Energy Services of all duties and obligations as an ABC under the Law. Please reference a copy of this filing as Attachments A and B.

For 83 III Adm. Code 454.70 (a) and (b) for licensure as an ABC, Santanna Energy Services has hereby filed a description of how we satisfy the Technical Licensing requirements as Attachment C of this response.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Shannon Teer, Gas Operations Team Leader
Santanna Natural Gas Corporation
6805 N. Capital of Texas Hwy., Suite 270
Austin, Texas 78731

ILLINOIS
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VERIFICATION	)	
	)	
STATE OF TEXAS	)	09-0597
	)	
COUNTY OF TRAVIS	)	

Shannon R. Teer, being first duly sworn, deposes and says that she is the Gas Operations Team leader at Santanna Natural Gas Corporation; that she has read the foregoing document, and all of the attachments accompanying and referred to within the document; and that the statements contained in the document and the attachments are true, correct and complete to the best of her knowledge, information and belief.

Shannon R. Teer

Subscribed and sworn to before me
this 26th day of February, 2010.

Jeannie Deaton
Notary Public

JEANNIE DEATON
NOTARY PUBLIC STATE OF TEXAS
COMMISSION EXPIRES:
DECEMBER 18, 2010

Attachment A

Santanna
ENERGY SERVICES

February 16, 2010

By Federal Express Overnight Priority
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Subject: Santanna Energy Services Application for ABC (Retail Electric Agents, Brokers, and Consultants) License.

Dear Chief Clerk:

Santanna Natural Gas Corporation d.b.a. Santanna Energy Services has this day filed via a hard copy sent by Federal Express Overnight Priority, its License or Permit Bond required by 83 III. Adm. Code Section 454.80 (a) for licensure as an ABC.

If you have questions regarding this matter, please do not hesitate to call.

Sincerely,

Shannon Teer, Gas Operations Team Leader
Santanna Natural Gas Corporation
6805 N. Capital of Texas Hwy., Suite 270
Austin, Texas 78731

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2010 MAR -1 P 12: 40
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Attachment A

License or Permit Bond

License or Permit Bond No. **93 BN V918 5**

State Farm Fire and Casualty Company
One State Farm Plaza, Bloomington, Illinois 61710-0001

KNOW ALL MEN BY THESE PRESENTS. That we, **SANTANNA NATURAL GAS CORPORATION DBA SANTANNA ENERGY SERVICES** as Principal, and **State Farm Fire and Casualty Company**, a **Illinois** Corporation, and authorization to do business in Illinois, as Surety, are held and firmly bound unto THE PEOPLE OF THE STATE OF ILLINOIS as Obligee, in the sum of FIVE THOUSAND AND NO/100 Dollars ($5,000.00), for which sum, we bind ourselves, our heirs, executors, administrators, successors and assigns, jointly and severally, by these presents.

THE CONDITIONS OF THIS OBLIGATION ARE SUCH, That WHEREAS, the Principal has been or is about to be granted a license or permit to do business to operate as an ABC (Agent, Broker, or Consultant) under 220 ILCS 5/16-115C and is required to execute this bond under 83 Illinois Administrative Code Part 454.80 by the Obligee.

NOW, Therefore, if the Principal fully and faithfully perform all duties and obligations of the Principal as an ABC, then this obligation to be void; otherwise to remain in full force and effect.

Attachment B

This bond may be terminated as to future acts of the Principal upon thirty (30) days written notice by the Surety; said notice to be sent to 527 East Capitol Avenue, Springfield, Illinois 62701, of the aforesaid State of Illinois, by certified mail.

Dated this 3RD day of FEBRUARY 2010.

_____ Principal

By: _____
[name] [title]

State Farm Fire and Casualty Company _____ Surety

By: _____ /Attorney-in-Fact
[name] [title]

Attachment C

Section 454.70 Technical Licensing Requirements

Since 2000 Santanna has amassed more than 40 years of managerial and technical expertise within the Illinois Electric Market place. The staff persons who embody expertise are as follows;

- Doug Cueller, Vice President and Chief Marketing Officer, 12 + Years
- Greg Rabaey, Vice President and Chief Operating Officer, 12 + Years
- Paul Kalas, Commercial and Industrial Sales, 10 + Years
- Matt Drogos, Commercial and Industrial Product Development and Broker Relations 9 + Years

When deregulated electricity became available in Illinois in 1999, Santanna expanded into the deregulated electricity market in 2000 via the Com Ed Power Purchase Option (PPO) program in 2000. Santanna analyzed thousands of Com Ed electric accounts for tariffs and alternative pricing options for commercial and industrial customers, and recommended the Com Ed PPO program for hundreds of accounts that could benefit. In most cases Santanna enrolled with Com Ed as the billing agent for these accounts on PPO. Santanna reviewed Com Ed tariff changes and alternative pricing options on an annual basis, or as-needed basis, and continued this program until most customer benefits ended in 2005.

Santanna partnered with Strategic Energy, headquartered in Pittsburgh Pennsylvania, starting in 2007, to provide electric choice to commercial and industrial customers. Through this partnership, Santanna recommended alternative electric pricing options for hundreds of accounts that could benefit. These accounts were served through Strategic Energy with Santanna as the channel partner/broker. Strategic Energy was licensed by the state of Illinois to provide electric service to commercial and industrial accounts larger than 15,000 kWh's annually.

In the period of June 2008 thru August 2008 Strategic Energy merged with Direct Energy, the new merged company became known as Direct Energy Business LLC on September 1, 2008, with home office located in Pittsburg Pennsylvania. Santanna continued as an exclusive channel partner/broker through Direct Energy Business LLC. With Direct Energy, Santanna has expanded electric pricing options into the Ameren Illinois electric service territories of Ameren IP, Ameren CIPS, and Ameren CILCO.

With the combination of the Santanna brokered accounts through Strategic Energy and Direct Energy Business LLC, well over 90% of the accounts that have been contracted since 2007 are still being served under the original or renewed contracts. This is a testament to Santanna's continuing value to these hundreds of customers an electric channel partner/broker.