

FILE



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

RECEIVED-DOCKETING DIV

2008 NOV 17 AM 9:07

PUCO

November 14, 2008

VIA UPS NEXT DAY AIR

Public Utilities Commission of Ohio
Docketing Division, 13th Floor
180 East Broad Street
Columbus, OH 43215-3793

Re: Case No. 02-2549-GA-CRS

Ladies and Gentlemen:

Enclosed for filing is an original and ten (10) copies of Stand Energy Corporation's Application for Renewal Certification as a Competitive Retail Natural Gas Supplier in Ohio. Attached to the application are all required Exhibits, including Exhibits C-3 and C-4 filed under seal and stamped "Confidential".

Also enclosed is an original and ten (10) copies of "Stand Energy Corporation's Motion for Protective Order and Waiver for Certain 2008 CRNGS Renewal Exhibits" and supporting Memorandum of Law. The Motion relates to the "Confidential" exhibits enclosed.

Please contact me if you have any questions about these filings.

Sincerely,

John M. Dosker
General Counsel

Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business
Technician Date Processed 11-17-08



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PUCO USE ONLY - Version 1.07		
Date Received	Renewal Certification Number	ORIGINAL CRS Case Number
		02 - 2549 - GA-CRS

RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS SUPPLIERS

Please type or print all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit A-16 - Company History*). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division, 13th Floor, 180 East Broad Street, Columbus, Ohio 43215-3793.

This PDF form is designed so that you may directly input information onto the form. You may also download the form by saving it to your local disk.

SECTION A - APPLICANT INFORMATION AND SERVICES

A-1 Applicant intends to renew its certificate as: (check all that apply)

☐ Retail Natural Gas Aggregator ☒ Retail Natural Gas Broker ☒ Retail Natural Gas Marketer

A-2 Applicant information:

Legal Name Stand Energy Corporation
Address 1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629
Telephone No. (513) 621-1113/800-598-2046 Web site Address www.stand-energy.com
Current PUCO Certificate No. 02-043(3) Effective Dates December 7, 2006 - December 7, 2008

A-3 Applicant information under which applicant will do business in Ohio:

Name Stand Energy Corporation
Address 1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629
Web site Address www.stand-energy.com Telephone No. (513) 621-1113/800-598-2046

A-4 List all names under which the applicant does business in North America:

Stand Energy Corporation

A-5 Contact person for regulatory or emergency matters:

Name Stacey Dover Title Business Analyst & Choice Coordinator
Business Address 1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629
Telephone No. 513-621-1113 Fax No. 513-621-3773 Email Address sdover@stand-energy.com

Stand (CRNGS Supplier Renewal) Page 1 of 7

A-6 Contact person for Commission Staff use in investigating customer complaints:

Name **Stacee Dover** Title **Business Analyst & Choice Coordinator**
Business address **1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629**
Telephone No. **513-621-1113** Fax No. **513-621-3773** Email Address **sdover@stand-energy.com**

A-7 Applicant's address and toll-free number for customer service and complaints

Customer service address **1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629**
Toll-Free Telephone No. **800-598-2046** Fax No. **513-621-3773** Email Address **sdover@stand-energy.com**

A-8 Provide "Proof of an Ohio Office and Employee," in accordance with Section 4929.22 of the Ohio Revised Code, by listing name, Ohio office address, telephone number, and Web site address of the designated Ohio Employee

Name **Stacee Dover** Title **Choice Coordinator**
Business address **1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629**
Telephone No. **513-621-1113** Fax No. **513-621-3773** Email Address **sdover@stand-energy.com**

A-9 Applicant's federal employer identification number **61-1065157**

A-10 Applicant's form of ownership: (Check one)

- | | |
|--|--|
| <input type="checkbox"/> Sole Proprietorship | <input type="checkbox"/> Partnership |
| <input type="checkbox"/> Limited Liability Partnership (LLP) | <input type="checkbox"/> Limited Liability Company (LLC) |
| <input checked="" type="checkbox"/> Corporation | <input type="checkbox"/> Other |

A-11 (Check all that apply) Identify each natural gas company service area in which the applicant is currently providing service or intends to provide service, including identification of each customer class that the applicant is currently serving or intends to serve, for example: *residential, small commercial, and/or large commercial/industrial (mercantile) customers*. (A mercantile customer, as defined in Section 4929.01(L)(1) of the Ohio Revised Code, means a customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within the state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside of this state. In accordance with Section 4929.01(L)(2) of the Ohio Revised Code, "Mercantile customer" excludes a not-for-profit customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within this state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside this state that has filed the necessary declaration with the Public Utilities Commission.)

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<input checked="" type="checkbox"/> Columbia Gas of Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Dominion East Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Duke Energy Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Vectren Energy Delivery of Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial

A-12 If applicant or an affiliated interest previously participated in any of Ohio's Natural Gas Choice Programs, for each service area and customer class, provide approximate start date(s) and/or end date(s) that the applicant began delivering and/or ended services.

☒ **Columbia Gas of Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	APRIL 1997	End Date	N/A
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	OCTOBER 1986	End Date	N/A
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	APRIL 1997	End Date	N/A
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	OCTOBER 1986	End Date	N/A

☒ **Dominion East Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	DECEMBER 1998	End Date	JUNE 2001
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	DECEMBER 1998	End Date	JUNE 2001
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	AUGUST 1995	End Date	N/A
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	AUGUST 1995	End Date	N/A

☒ **Duke Energy Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	DECEMBER 1997	End Date	N/A
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	DECEMBER 1997	End Date	N/A
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	MARCH 1985	End Date	N/A
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	MARCH 1985	End Date	N/A

☒ **Vectren Energy Delivery of Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	N/A	End Date	N/A
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	N/A	End Date	N/A
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	APRIL 1989	End Date	N/A
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	APRIL 1989	End Date	N/A

A-13 If not currently participating in any of Ohio's four Natural Gas Choice Programs, provide the approximate start date that the applicant proposes to begin delivering services:

<input checked="" type="checkbox"/>	Columbia Gas of Ohio	Intended Start Date	Currently Participating
<input checked="" type="checkbox"/>	Dominion East Ohio	Intended Start Date	NOT PARTICIPAING
<input checked="" type="checkbox"/>	Duke Energy Ohio	Intended Start Date	Currently Participating
<input checked="" type="checkbox"/>	Vectren Energy Delivery of Ohio	Intended Start Date	NOT PARTICIPATING

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- A-14 **Exhibit A-14 "Principal Officers, Directors & Partners,"** provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.
- A-15 **Exhibit A-15 "Corporate Structure,"** provide a description of the applicant's corporate structure, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale natural gas or electricity to customers in North America.
- A-16 **Exhibit A-16 "Company History,"** provide a concise description of the applicant's company history and principal business interests.
- A-17 **Exhibit A-17 "Articles of Incorporation and Bylaws,"** provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto, *only if the contents of the originally filed documents changed since the initial application.*
- A-18 **Exhibit A-18 "Secretary of State,"** provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- B-1 **Exhibit B-1 "Jurisdictions of Operation,"** provide a current list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail natural gas service, or retail/wholesale electric services.
- B-2 **Exhibit B-2 "Experience & Plans,"** provide a current description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.
- B-3 **Exhibit B-3 "Summary of Experience,"** provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking renewed certification (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).
- B-4 **Exhibit B-4 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational

status or ability to provide the services for which it is seeking renewed certification since applicant last filed for certification.

- B-5 Exhibit B-5 "Disclosure of Consumer Protection Violations,"** disclose whether the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant has been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws since applicant last filed for certification.

☒ No ☐ Yes

If Yes, provide a separate attachment labeled as **Exhibit B-5 "Disclosure of Consumer Protection Violations,"** detailing such violation(s) and providing all relevant documents.

- B-6 Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation,"** disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, or revoked, or whether the applicant or predecessor has been terminated from any of Ohio's Natural Gas Choice programs, or been in default for failure to deliver natural gas since applicant last filed for certification.

☒ No ☐ Yes

If Yes, provide a separate attachment, labeled as **Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation,"** detailing such action(s) and providing all relevant documents.

SECTION C - APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- C-1 Exhibit C-1 "Annual Reports,"** provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information, labeled as Exhibit C-1, or indicate that Exhibit C-1 is not applicable and why.
- C-2 Exhibit C-2 "SEC Filings,"** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 whether the applicant is not required to file with the SEC and why.
- C-3 Exhibit C-3 "Financial Statements,"** provide copies of the applicant's two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer-certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer-certified financial statements covering the life of the business.
- C-4 Exhibit C-4 "Financial Arrangements,"** provide copies of the applicant's current financial arrangements to conduct competitive retail natural gas service (CRNGS) as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.)
- C-5 Exhibit C-5 "Forecasted Financial Statements,"** provide two years of forecasted financial statements (balance sheet, income statement, and cash flow statement) for the applicant's CRNGS operation, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer.

Stand

- C-6 **Exhibit C-6 "Credit Rating,"** provide a statement disclosing the applicant's current credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody's Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant.
- C-7 **Exhibit C-7 "Credit Report,"** provide a copy of the applicant's current credit report from Experian, Dun and Bradstreet, or a similar organization.
- C-8 **Exhibit C-8 "Bankruptcy Information,"** provide a list and description of any reorganizations, protection from creditors, or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or since applicant last filed for certification.
- C-9 **Exhibit C-9 "Merger Information,"** provide a statement describing any dissolution or merger or acquisition of the applicant since applicant last filed for certification.

SECTION D – APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- D-1 **Exhibit D-1 "Operations,"** provide a current written description of the operational nature of the applicant's business. Please include whether the applicant's operations will include the contracting of natural gas purchases for retail sales, the nomination and scheduling of retail natural gas for delivery, and the provision of retail ancillary services, as well as other services used to supply natural gas to the natural gas company city gate for retail customers.
- D-2 **Exhibit D-2 "Operations Expertise,"** given the operational nature of the applicant's business, provide evidence of the applicant's current experience and technical expertise in performing such operations.
- D-3 **Exhibit D-3 "Key Technical Personnel,"** provide the names, titles, email addresses, telephone numbers, and background of key personnel involved in the operational aspects of the applicant's current business.

Applicant Signature and Title

X. Joshua A. Phelps, President

Sworn and subscribed before me this 14th

day of November

Month

2008

Year

John M. Dosker, Notary Public

Signature of official administering oath

Print Name and Title

My commission expires on

03/25/2012

JOHN M. DOSKER
Notary Public, State of Ohio
My Commission Expires 03-25-2012

Stand



The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service
Affidavit Form
(Version 1.07)

In the Matter of the Application of)

for a Certificate or Renewal Certificate to Provide)
Competitive Retail Natural Gas Service in Ohio.)

Case No. 02 - 2549 -GA-CRS

County of Hamilton
State of Ohio

Judith A. Phillips

[Affiant], being duly sworn/affirmed, hereby states that:

- (1) The information provided within the certification or certification renewal application and supporting information is complete, true, and accurate to the best knowledge of affiant.
- (2) The applicant will timely file an annual report of its intrastate gross receipts and sales of hundred cubic feet of natural gas pursuant to Sections 4905.10(A), 4911.18(A), and 4929.23(B), Ohio Revised Code.
- (3) The applicant will timely pay any assessment made pursuant to Section 4905.10 or Section 4911.18(A), Ohio Revised Code.
- (4) Applicant will comply with all applicable rules and orders adopted by the Public Utilities Commission of Ohio pursuant to Title 49, Ohio Revised Code.
- (5) Applicant will cooperate with the Public Utilities Commission of Ohio and its staff in the investigation of any consumer complaint regarding any service offered or provided by the applicant.
- (6) Applicant will comply with Section 4929.21, Ohio Revised Code, regarding consent to the jurisdiction of the Ohio courts and the service of process.
- (7) Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the certification or certification renewal application within 30 days of such material change, including any change in contact person for regulatory or emergency purposes or contact person for Staff use in investigating customer complaints.
- (8) Affiant further sayeth naught.

Affiant Signature & Title

Judith A. Phillips, President

Sworn and subscribed before me this 14th day of November Month 2008 Year

John M. Dosker, Notary Public

Signature of Official Administering Oath

Print Name and Title

JOHN M. DOSKER
Notary Public, State of Ohio
My Commission Expires 03-25-2012

My commission expires on 03/25/2012

Stand (CRNGS Supplier Renewal)

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SECTION A - APPLICANT INFORMATION AND SERVICES

A-14 Exhibit A-14 "Principal Officers, Directors & Partners," provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.

Answer:

Judith A. Phillips, President & Chief Executive Officer
1077 Celestial St., Suite 110
Cincinnati, OH 45202-1629
(513) 621-1113

Matth. Toeppen, Chairman of the Board of Directors
1077 Celestial St., Suite 110
Cincinnati, OH 45202-1629
(513) 621-1113

Robert A. Embry, Vice-President/CFO
1077 Celestial St., Suite 110
Cincinnati, OH 45202-1629
(513) 621-1113

Larry Freeman, Vice-President Operations
1077 Celestial St., Suite 110
Cincinnati, OH 45202-1629
(513) 621-1113

A-15 Exhibit A-15 "Corporate Structure," provide a description of the applicant's corporate structure, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale natural gas or electricity to customers in North America.

Answer:

Stand Energy Corporation is a privately held Kentucky corporation with its principal place of business located in Cincinnati, Ohio. Stand Energy Corporation has no affiliate or subsidiary companies that supply retail or wholesale natural gas or electricity. No other corporate entity is owned in any way or amount by Stand Energy Corporation.

A-16 Exhibit A-16 "Company History," provide a concise description of the applicant's company history and principal business interests.

Answer:

Stand Energy Corporation ("SEC") is a privately held Kentucky corporation formed in 1984. Two of the original three principals continue to work in the day-to-day operation of the company. Prior to forming SEC, Judith A. Phillips (President), worked for twenty years at Columbia Hydrocarbons. In addition, Ms. Phillips formed a separate company, Kendow Energies, a wholesale propane distributor.

SEC initially concentrated on large multi-location industrial customers. Over the years, however, the focus of operations has changed to small to medium sized commercial and industrial customers. More recently, SEC has taken part in various choice programs serving residential and small commercial end users.

In addition to natural gas marketing, SEC has constructed several LDC by-pass pipelines and builds propane alternate fuel installations for customers interested in receiving interruptible gas service.

A-17 Exhibit A-17 "Articles of Incorporation and Bylaws, provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto, *only if the contents of the originally filed documents changed since the initial application.*

Answer:

There have been no changes to Stand Energy Corporation's Articles of Incorporation or Bylaws since the original CRNGS application was filed with the PUCO.

A-18 Exhibit A-18 "Secretary of State," provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

Answer:

Stand Energy has previously filed in this case its Permanent Application filed with the Ohio Secretary of State on September 5, 1986. Attached is a current Certificate of Existence (Good Standing) from the Kentucky Secretary of State dated November 14, 2008 and a Certificate of Good Standing from the Ohio Secretary of State dated November 14, 2008.

**Commonwealth of Kentucky
Trey Grayson, Secretary of State**

11/14/2008

Division of Corporations
Business Filings

P. O. Box 718
Frankfort, KY 40602
(502) 564-2848
<http://www.sos.ky.gov>

Certificate of Existence

Authentication Number: 72505

Jurisdiction: Public Utility Commission of Ohio

Visit <http://apps.sos.ky.gov/business/obdb/certvalidate.aspx> to authenticate this certificate.

I, Trey Grayson, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

STAND ENERGY CORPORATION

is a corporation duly incorporated and existing under KRS Chapter 271B, whose date of incorporation is December 28, 1984 and whose period of duration is perpetual.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that articles of dissolution have not been filed; and that the most recent annual report required by KRS 271B.16-220 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 14th day of November, 2008.



Tn6z

Trey Grayson
Secretary of State
Commonwealth of Kentucky
72505/0196832

Stand Exh A-18 Page 13

**United States of America
State of Ohio
Office of the Secretary of State**

*I, Jennifer Brunner, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show **STAND ENERGY CORPORATION**, a Kentucky corporation, having qualified to do business within the State of Ohio on September 05, 1986 under License No. 685018 is currently in **GOOD STANDING** upon the records of this office.*



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 14th day of November, A.D. 2008*

A handwritten signature in cursive script, appearing to read "Jennifer Brunner".

Ohio Secretary of State

Validation Number: V2008318NBCC71

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

B-1 Exhibit B-1 "Jurisdictions of Operation," provide a current list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail natural gas service, or retail/wholesale electric services.

Answer:

Currently SEC is providing retail natural gas marketing and brokering services (no electric) in the following jurisdictions: Illinois, Indiana, Kentucky, Maryland, Michigan, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Virginia, West Virginia, and Washington, D.C.

B-2 Exhibit B-2 "Experience & Plans," provide a current description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.

Answer:

SEC, with almost 25 years of experience, has been a hands-on participant in the evolution of natural gas contracting. We have historically used industry standard language in consumer contracts. Typically, SEC has done the vast majority of billing in-house. SEC also has elected on occasion to utilize LDC billing services. Computer software insures timeliness and accuracy of invoicing.

Customers may contract with SEC only via written contract at this time. One employee has been assigned the task of responding to customer complaints. Everyone in the Company is tasked with responding to customer inquiries.

B-3 Exhibit B-3 "Summary of Experience," provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking renewed certification (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).

Answer:

Stand Energy Corporation currently serves approximately 1700 commercial and industrial customer locations including approximately 100 choice customers (mostly mercantile) behind the following utilities:

ILLINIOS

Peoples Gas
NICOR Gas
Illinois Power Company

INDIANA

Batesville Gas & Water
Indiana Gas
NIPSCO
Citizens Gas
Vectren Energy Delivery Of Indiana
Lawrenceburg Gas
Northern Indiana Fuel & Light Co

KENTUCKY

Duke Energy of Kentucky
Louisville Gas & Electric
Western Kentucky Gas
Richmond Utilities
Delta Natural Gas Co., Inc.
Columbia Gas of Kentucky

MARYLAND

Boston Gas
Baltimore Gas & Electric

MICHIGAN

Michigan Consolidated
Consumers Power
Michigan Gas

NEW YORK

Rochester Gas & Electric
National Fuel Gas Distribution Co
Niagra Mohawk
New York State Electric & Gas
Corning Gas

OHIO

Waterville Gas
Ohio Gas Company
Columbia of Ohio
Dominion West Ohio
Dominion East Ohio
Pike Natural Gas
Duke Energy of Ohio
Vectren Energy Delivery of Ohio
Union Rural Electric

PENNSYLVANIA

National Fuel Gas Distribution Co
Equitable Gas Company
Dominion Peoples
Columbia of Pennsylvania

SOUTH CAROLINA

Piedmont Natural Gas Company

TENNESEE

Nashville Gas
ATMOS Tennessee

VIRGINIA

ATMOS Virginia
Columbia Gas Of Virginia
Virginia Natural Gas
City Of Richmond
Washington Gas & Light - Shanondoah

WEST VIRGINIA

Allegheny Power
Blacksville Oil & Gas

B-4 Exhibit B-4 "Disclosure of Liabilities and Investigations," provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or opera status or ability to provide the services for which it is seeking renewed certification since applicant last filed for certification.

Answer:

There are no existing, pending or past rulings, judgments, contingent liabilities, revocation or authority, regulatory investigations, or any other matter that could adversely impact SEC's financial or operational status or ability to provide the services it is seeking to be certified to provide.

B-5 Exhibit B-5 "Disclosure of Consumer Protection Violations," disclose whether the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant has been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws since applicant last filed for certification.

✓ No ☐ Yes

If Yes, provide a separate attachment labeled as Exhibit B-5 "Disclosure of Consumer Protection Violations," detailing such violation(s) and providing all relevant documents.

B-6 Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation," disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, or revoked, or whether the applicant or predecessor has been terminated from any of Ohio's Natural Gas Choice programs, or been in default for failure to deliver natural gas since applicant last filed for certification.

✓ No ☐ Yes

If Yes, provide a separate attachment, labeled as Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation," detailing such action(s) and providing all relevant documents.

SECTION C - APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

C-1 Exhibit C-1 "Annual Reports," provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information, labeled as Exhibit C-1, or indicate that Exhibit C-1 is not applicable and why.

Answer:

Stand Energy Corporation is a closely held corporation and as such its stock is not publicly traded. An annual report to the shareholders has never been prepared.

C-2 Exhibit C-2 "SEC Filings," provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 whether the applicant is not required to file with the SEC and why.

Answer:

Stand Energy Corporation is a privately-held company and therefore is not required to file with the U.S. Securities Exchange Commission because its stock is not publicly traded.

C-3 Exhibit C-3 "Financial Statements," provide copies of the applicant's two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer-certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer-certified financial statements covering the life of the business.

Answer: FILED UNDER SEAL

All documents contained as Exhibits to this section C-3 are filed under seal with a Motion For Protective Order filed with the Public Utilities Commission of Ohio. The Exhibits to this section are filed under seal as Stand Energy Corporation Application Pages 24 - 37.

C-4 Exhibit C-4 "Financial Arrangements," provide copies of the applicant's current financial arrangements to conduct competitive retail natural gas service (CRNGS) as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.)

Answer: FILED UNDER SEAL

All documents contained as Exhibits to this section C-4 are filed under seal with a Motion For Protective Order filed with the Public Utilities Commission of Ohio. The Exhibits to this section are filed under seal as Stand Energy Corporation Application Pages 39 - 42.

C-5 Exhibit C-5 "Forecasted Financial Statements," provide two years of forecasted financial statements (balance sheet, income statement, and cash flow statement) for the applicant's CRNGS operation, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer.

Answer:

Stand Energy Corporation does not prepare or maintain forecasted or forward-looking financial statements. Stand Energy Corporation's audited financials and bank financing documentation should satisfy the Commission that Stand Energy Corporation is financially capable to continue to supply its commercial and industrial customers (and the very limited number of retail natural gas customers) in Ohio it serves. Stand Energy Corporation is an approved supplier on, and has satisfied credit requirements with, all LDC's on which it does business, in Ohio and all other states.

C-6 Exhibit C-6 "Credit Rating," provide a statement disclosing the applicant's current credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody's Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant.

Answer: Stand Energy Corporation's Dun and Bradstreet Information Services rating is enclosed as responsive to combined Exhibits C-6 and C-7.

C-7 Exhibit C-7 "Credit Report," provide a copy of the applicant's current credit report from Experion, Dun and Bradstreet, or a similar organization.

Answer: Stand Energy Corporation's credit report from Dun & Bradstreet is attached as combined Exhibits C-6 and C-7.

Live Report : STAND ENERGY CORPORATION

D-U-N-S® Number: 12-129-3039

Endorsement: kkellems@stand-energy.com

D&B Address
Address 1077 Celestial St Ste 110
 Cincinnati, OH - 45202
Location Type Headquarters
Phone 513 621-1113
Fax
Web www.stand-energy.com

Trade Names
Trade Names No trade names for this company.

Company Summary

Trade Payments - Timeliness of Historical Payments

When weighted by dollar amount, Payments to suppliers average 5 days beyond terms

12-month D&B PAYDEX®: 77

(Lowest Risk:100; Highest Risk:1) This assessment is based on D&B's 12-month PAYDEX® Score.

Predictive Indicators - Risk of Financial Stress

Financial Stress Score Class: 1

Low risk of severe financial stress over the next 12 months.

History & Operations

This is a headquarters location

Branch(es) or Division(s) exist Y
 Chief Executive MATTH TOEBBEN, CEO
 Year Started 1984
 Employees 23 (20 Here)
 Financing SECURED
 SIC 4824
 Line of business Natural gas distribution
 NAICS 221210
 History Status CLEAR
 Financial Condition GOOD

Public Filings

The following data includes both open and closed filings found in D&B's database on this company.

Record Type	Number of Records	Most Recent Filing Date
Bankruptcies	0	-
Judgments	0	-
Liens	0	-
Suits	0	-
UCC's	1	06/04/04

The public record items contained herein may have been paid,

Predictive Indicators - Risk of Payment Delinquency

Commercial Credit Score Class: 1

Low risk of severe payment delinquency over next 12 months.

Predictive Indicators - Supplier Evaluation Risk

Supplier Evaluation Risk Rating: 1 Low risk of supplier experiencing severe financial stress over the next 12 months.

Predictive Indicators - Credit Capacity

D&B Rating: 3A2

Financial Strength: 3A indicates \$1,000,000 to \$9,999,999
Commercial Credit Appraisal: 2 is good

This assessment is based on D&B's D&B Rating.

Financials Overview

Financial Statement Date	12/31/2007
Total Current Assets	\$26,015,256.00
Total Current Liabilities	\$17,579,610.00
Total Assets	\$26,309,777.00
Total Liabilities + Equity	\$26,309,777.00
Current Ratio	1.5
Quick Ratio	1.3
Total Liabilities to Net Worth Ratio	201.4
Sales to Net Working Capital Ratio	19.7
Net Worth	\$8,730,167.00
Annual Sales	\$166,589,741.00

News & Alerts

Alert Type	Date	Alert Details
Supplier Evaluation Risk Rating	10/18/2008	View
Commercial Credit Score Class	10/18/2008	View
PAYDEX	10/15/2008	View

Exh C-6/c-7 Stand 46

C-8 Exhibit C-8 "Bankruptcy Information," provide a list and description of any reorganizations, protection from creditors, or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or since applicant last filed for certification.

Answer:

No reorganizations, protection from creditors, or any other form of bankruptcy filings by the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application have occurred.

C-9 Exhibit C-9 "Merger Information," provide a statement describing any dissolution or merger or acquisition of the applicant since applicant last filed for certification.

Answer:

No dissolution or merger or acquisition by the applicant within the five most recent years preceding the application, or at any time since inception and formation of the corporation have occurred.

SECTION D – APPLICANT TECHNICAL CAPABILITY

D-1 Exhibit D-1 “Operations,” provide a current written description of the operational nature of the applicant’s business. Please include whether the applicant’s operations will include the contracting of natural gas purchases for retail sales, the nomination and scheduling of retail natural gas for delivery, and the provision of retail ancillary services, as well as other services used to supply natural gas to the natural gas company city gate for retail customers.

Answer:

SEC has long term commitments for natural gas supply and pipeline transportation services (including storage) to serve its retail commercial, industrial and governmental customers. These long term commitments for supply and transportation tie into the nomination and scheduling function that are handled in-house, on a daily basis. Supply and delivery services are from a mix of sources (southwest, mid-continent, and Appalachian) to insure ongoing reliability. SEC does not currently offer retail ancillary services other than natural gas consulting services supplied to all customers. There is no separate charge for Stand Energy's ancillary services.

D-2 Exhibit D-2 "Operations Expertise," given the operational nature of the applicant's business, provide evidence of the applicant's current experience and technical expertise in performing such operations.

Answer:

SEC has been involved in the purchase, sale, transportation and scheduling of natural gas since 1984. SEC has long-standing relationships with a diverse group of suppliers that offers flexibility in sourcing. Included in SEC's transportation mix are primary and secondary firm, plus pipeline storage. In its almost 25-year history, SEC has never failed to deliver required quantities of gas to end-use customers.

D-3 Exhibit D-3 "Key Technical Personnel," provide the names, titles, email addresses, telephone numbers, and background of key personnel involved in the operational aspects of the applicant's current business.

Answer:

Larry Freeman
Vice President, Operations
(513) 621-1113
lfreeman@stand-energy.com

Graduate (with honors) of University of Cincinnati (1994) with BA in Economics.
Employed by Stand Energy Corporation since 1994.

Nan Hamilton
Director, Gas Trading & Risk Management
(513) 621-1113
nhamilton@stand-energy.com

Graduate of University of Oklahoma
Eighteen years of petroleum trading and pipeline experience.
Employed by Stand Energy Corporation since 1995.

Tom Meier
Gas Control Specialist
(513) 621-1113
tmeier@stand-energy.com

Earned a BS degree from the University of Cincinnati 1998.
Employed by Stand Energy Corporation since 1998.

Kevin Ralston
Gas Control Specialist
(513) 621-1113
kralston@stand-energy.com

Earned a BS degree from the University of Charleston in May 2000.
Employed by Stand Energy Corporation since 2000.

Adam Howard
Gas Control Specialist
(513) 621-1113
ahoward@stand-energy.com

Earned a BS in Economics from the University of Kentucky in May 2007
Employed by Stand Energy Corporation since 2007.