

FILE

March 29, 2016

Public Utilities Commission of Ohio
Docketing Division 11th Floor
180 East Broad St.
Columbus, Ohio 43215-3793

**RE: Renewal Application of Independent Energy Consultants, Inc. for Certification
as a Competitive Retail Natural Gas Broker and Aggregator, Case No. 04-593-GA-
AGG and Motion for Protective Order**

Enclosed please find an original and three (3) copies of the Renewal Application of Independent Energy Consultants, Inc. for Certification as a Competitive Retail Natural Gas Broker and Aggregator.

Also included is an original and three (3) copies of Independent Energy Consultant's Motion for Protective Order regarding Sections C-3 and C-5 of the Application. The information responding to Sections C-3 and C-5 is stamped confidential and is contained in a single sealed envelope also marked confidential.

Please feel free to call me at (330) 643-0212 if you have any questions. Thank you for your assistance.

Very truly yours,



David J. Hrina
DJH/lc
Enclosures

AK3:1222544_v1

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Date Received	Renewal Certification Number	ORIGINAL AGG Case Number
		04 - 0593 - GA-AGG

RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS BROKERS/AGGREGATORS

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, 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

A-2 Applicant information:

Legal Name Independent Energy Consultants, Inc.
Address 215 W. Garfield Road, Suite 210 Aurora, Ohio 44202
Telephone No. 330-995-2675 Web site Address www.naturalgas-electric.com
Current PUCO Certificate No. 04-078G(6) Effective Dates May 26, 2014- May 26, 2016

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

Name Independent Energy Consultants, Inc.
Address 215 W. Garfield Road, Suite 210 Aurora, Ohio 44202
Web site Address www.naturalgas-electric.com Telephone No. 330-995-2675

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

Independent Energy Consultants, Inc.

A-5 Contact person for regulatory or emergency matters:

Name Mark R. Burns Title President
Business Address 215 W. Garfield Road, Suite 210 Aurora, Ohio 44202
Telephone No. 330-995-2675 Fax No. 800-574-4508 Email Address mburns@naturalgas-electric.com

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

Name Mark R. Burns Title President
Business address 215 W. Garfield Road, Suite 210 Aurora, Ohio 44202
Telephone No. 330-995-2675 Fax No. 800-574-4508 Email Address mburns@naturalgas-electric.com

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

Customer service address 215 W. Garfield Road, Suite 210 Aurora, Ohio 44202
Toll-Free Telephone No. 888-862-6060 Fax No. 800-574-4508 Email Address info@naturalgas-electric.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 Mark R. Burns Title President
Business address 215 W. Garfield Road, Suite 210 Aurora, Ohio 44202
Telephone No. 330-995-2675 Fax No. 800-574-4508 Email Address mburn@naturalgas-electric.com

A-9 Applicant's federal employer identification number 20-0989144

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.)

<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	June 1, 2004	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	June 1, 2004	End Date

☒ Dominion East Ohio

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	June 1, 2004	End Date

☒ Duke Energy Ohio

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	June 1, 2004	End Date

☒ Vectren Energy Delivery of Ohio

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service	June 1, 2004	End Date
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service	June 1, 2004	End Date

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 type="checkbox"/>	Columbia Gas of Ohio	Intended Start Date
<input type="checkbox"/>	Dominion East Ohio	Intended Start Date
<input type="checkbox"/>	Duke Energy Ohio	Intended Start Date
<input type="checkbox"/>	Vectren Energy Delivery of Ohio	Intended Start Date

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.

- 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 Experion, 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 functions.
- 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

Mal R Binn, PRESIDENT

Sworn and subscribed before me this

10th

day of

March

Month

2016

Year

Pawandeep Kour Raina

Signature of official administering oath

Pawandeep Kour Raina, Notary Public

Print Name and Title

My commission expires on

June 12 2019





The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service
Affidavit Form
(Version 1.07)

In the Matter of the Application of)

Independent Energy Consultants, Inc.)

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

Case No. 04 - 0593 -GA-AGG

County of Portage

State of Ohio

Mark R. Burns

[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

Mark R. Burns, PRESIDENT

Sworn and subscribed before me this

10

day of

March

Month

2016

Year

P. Kour Rains

Signature of Official Administering Oath

Pawandeep Kour Rains, Notary Public

Print Name and Title



My commission expires on

June 12 2019

Exhibit A-14 "Principal Officers, Directors & Partners"

Officers

Mark R. Burns, President
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns, Vice President
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns, Treasurer
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns, Secretary
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Directors

Mark R. Burns
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Exhibit A-15 "Corporate Structure"

Independent Energy Consultants, Inc. has seven employees and two contractors who provide administrative and information technology support. The office address is 215 W Garfield Road Suite 210, Aurora, OH 44202. The corporation does not have any affiliates and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. The corporation seeks to outsource key functions where possible. It has and will continue to hire additional contractors/employees for special projects or when the need arises.

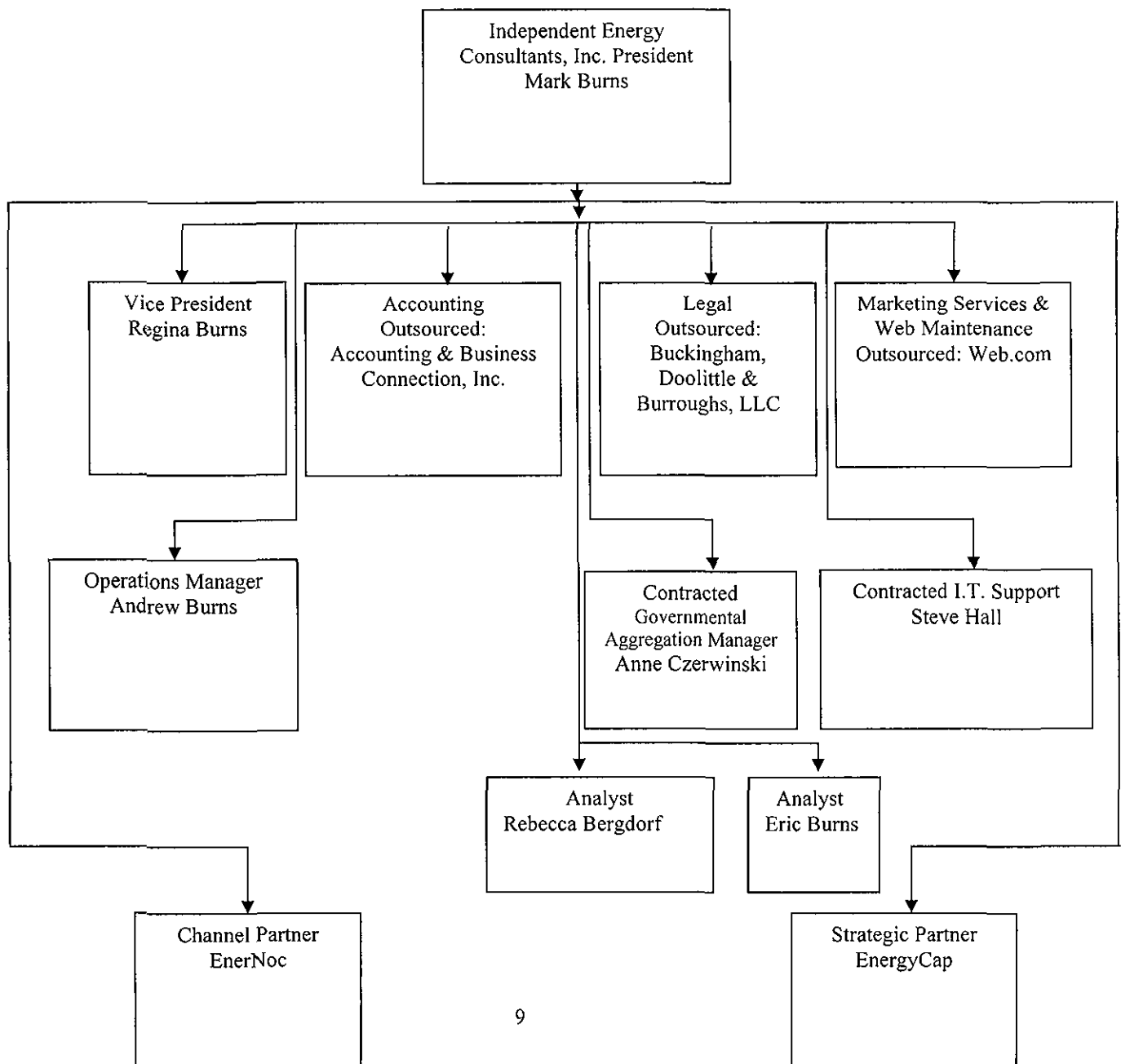


Exhibit A-16 "Company History"

Independent Energy Consultants, Inc. incorporated in the State of Ohio in April 2004 and was certified as a broker and aggregator of both natural gas and electric by the Public Utilities Commission of Ohio on May 23, 2004. The Virginia State Corporation Commission similarly licensed them as brokers and aggregators of natural gas and electricity on June 11, 2004. The State of Texas has also registered them as an aggregator of electricity on June 27, 2007. The State of Illinois licensed them as an Agent/Broker/Consultant on July 18, 2011.

Independent Energy Consultants is actively engaged in the design, development and ongoing support of Government Aggregation programs in Ohio. The founder of Independent Energy Consultants, Inc. helped establish the first Governmental Aggregation programs in Ohio, and has led the design, implementation and administration of many opt-out Governmental Aggregation Programs that currently impact over 100 communities.

Independent Energy Consultants, Inc. has also brokered deals for Commercial and Industrial natural gas customers and is very familiar with the PUCO rules and tariffs for each Ohio LDC.

Independent Energy Consultants is the contracted Energy Manager for an Ohio-based Group Purchasing Organization (Corporate United) that serves approximately 200 fortune-2000 companies.

Independent Energy Consultants, Inc. is well versed in the analysis of utility tariffs and has provided utility bill auditing services in Ohio and throughout the United States.

Independent Energy Consultants, Inc. President is Certified Energy Manager (CEM) and provides energy audits and energy efficiency consulting services to commercial, industrial and governmental entities.

The principals have no other business interests.

Exhibit A-17 "Articles of Incorporation and Bylaws"

The original Articles of Incorporation and Bylaws filed in Case number 04-593-GA-AGG have not changed, and as such are not resubmitted.

Exhibit A-18 "Secretary of State"

Independent Energy Consultants, Inc. remains registered with the Secretary of State under Charter/Registration number 1454632.

200409803290

DATE:	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
04/08/2004	200409803290	DOMESTIC ARTICLES/FOR PROFIT (ARF)	125.00	100.00	.00	.00	.00

Receipt

This is not a bill. Please do not remit payment.

HARRINGTON HOPPE & MITCHELL, LTD.
26 MARKET ST
SUITE 1200
YOUNGSTOWN, OH 44503

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, J. Kenneth Blackwell

1454632

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

INDEPENDENT ENERGY CONSULTANTS, INC.

and, that said business records show the filing and recording of:

Document(s):
DOMESTIC ARTICLES/FOR PROFIT

Document No(s):
200409803290



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

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 7th day of April, A.D. 2004.

J. Kenneth Blackwell
Ohio Secretary of State

Exhibit B-1 “Jurisdictions of Operation”

Independent Energy Consultants, Inc. is certified by the Public Utilities Commission of Ohio to provide brokerage and aggregation services of natural gas and electricity throughout all deregulated areas of Ohio. They are similarly licensed in:

- Illinois by the Illinois Commerce Commission as an Agent/Broker/Consultant,
- Virginia by the Virginia State Corporation Commission to provide brokerage and aggregation services of natural gas and electricity, and
- The Public Utilities Commission of Texas as an Aggregator of Electric.

Exhibit B-2 "Experience & Plans"

Contract Services: With the aid of its legal counsel, Independent Energy Consultants, Inc. has developed a standard professional services agreement that it will use with its clients. It will also use the respective commodity suppliers' "Independent Agent Agreements" when brokering deals between suppliers and commercial and industrial customers.

Billing Statements: Independent Energy Consultants, Inc. will broker deals for Commercial and Industrial customers and design and implement Governmental Aggregation programs. In the process it will never take title to gas, so there will be no billing for the commodity. Independent Energy Consultants will provide invoices to its clients for consulting services rendered using a commercial grade accounting system.

Customer Service Experience: Independent Energy Consultants, Inc. is currently administering Electric and/or Natural Gas Governmental Aggregation programs that impact a combination of over 100 Ohio communities. Independent Energy Consultants also provides brokerage service to many commercial and industrial customers outside of aggregation programs. Most questions and calls were answered immediately, and all were responded to within 24 hours of receipt. Customer service often came in the form of assisting residents who had contacted their local government and/or Choice supplier and who still had questions or disputes.

Frequent communication with and detailed quarterly reports to governmental aggregators was used as a customer service technique to head off problems before they arose. This involved training of municipal personnel and preparation of material such as Frequently Asked Questions (FAQs), press releases and conducting informational town hall meetings.

Customer Complaints and Inquiries: During the past fifteen years, Mr. Burns helped facilitate the resolution of numerous customer complaints. Virtually all of the questions and complaints, however, concerned matters involving the local utility and/or the supplier of choice.

Inquiries directed to a consulting firm such as Independent Energy Consultants, Inc. usually pertain to the customers seeking advice on the aggregation process, deciding whether or not to accept an offer, help understanding utility bills, etc. Customer complaints or inquiries can be made in a number a ways. Customers may contact Independent Energy Consultants, Inc. by:

- Calling the direct number: (330) 995-2765
- Calling the toll free number: (888) 862-6060
- Sending a fax: (800) 574-4508
- Sending an e-mail: mburns@naturalgas-electric.com; rburns@naturalgas-electric.com
- Contact via the IEC website: info@naturalgas-electric.com

Exhibit B-3 "Summary of Experience"

Contract Services: With the aid of its legal counsel, Independent Energy Consultants, Inc. has developed a standard professional services agreement that it uses with its clients. It will also use the respective commodity suppliers' "Independent Agent Agreements" when brokering deals between suppliers and commercial and industrial customers.

Billing Statements: Independent Energy Consultants, Inc. brokers energy contracts for Commercial and Industrial customers and designs and implements Governmental Aggregation programs. In the process it never takes title to gas, so there is no billing for the commodity. Independent Energy Consultants does provide invoices to its clients for consulting services rendered using a commercially available accounting system.

Customer Service Experience: Independent Energy Consultants, Inc. is currently administering Electric and/or Natural Gas Governmental Aggregation programs that impact a combination of over 100 Ohio communities. Independent Energy Consultants also provides brokerage service to many commercial and industrial customers outside of aggregation programs. Most questions and calls were answered immediately, and all were responded to within 24 hours of receipt.

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- Calling the direct number: (330) 995-2675
- Calling the toll free number: (888) 862-6060
- Sending a fax: (800) 574-4508
- Sending an e-mail: mburns@naturalgas-electric.com; rburns@naturalgas-electric.com
- Contact via the Independent Energy Consultants website: info@naturalgas-electric.com

Exhibit B-3 "Summary of Experience"

Mark Burns, the President of Independent Energy Consultants, Inc., has extensive experience working in wholesale and retail markets in Ohio and other states.

While a utility employee Mr. Burns was responsible for understanding tariffs, state regulations, and pricing bids for buying groups in the states of Pennsylvania, New Jersey, Delaware and Maryland. Mr. Burns has experience in many aspects of the electric and natural gas utility industries. While employed by 3 utility companies he held *management positions in the areas of strategic planning, trading, risk management, sales, operations and engineering.*

Each staff member at Independent Energy Consultants has anywhere from 4-10 years' experience working with the company. Their duties are directly related to supporting *our commercial and industrial brokerage business and serving many Governmental Aggregation Programs.*

The company provides a variety of consulting services to natural gas and electric customers and buying groups. In addition to brokerage and aggregation services Independent Energy Consultants, Inc. offers (i) utility tariff analysis (ii) bill auditing and energy accounting services, (iii) demand response, (iv) real-time energy information systems, (v) facility audits, and (vi) recommendation of energy efficiency improvement projects.

Independent Energy Consultants has established natural gas and electric governmental aggregation programs in the Duke, Dominion East Ohio, and Columbia Gas of Ohio, Ohio Edison, Cleveland Electric Illuminating and Ohio Power service territories. The company also works with commercial and industrial customers in Ohio and in many deregulated markets across the U.S.

Since the onset of deregulation in Ohio, the founder of Independent Energy Consultants, Inc. has led the development and administration of many government aggregation programs that serve many communities. Independent Energy Consultants has designed implemented and administered hundreds of aggregation programs across Ohio. *The cumulative total of these natural gas and electric groups represents over 350,000 residential customers and tens of thousands of commercial customers.*

Exhibit B-4 "Disclosure of Liabilities and Investigations"

Neither Independent Energy Consultants, Inc. nor any of its employees have ever had a judgment, investigation, or ruling against it that would financially or operationally impact its ability to perform the brokerage and aggregation service for which it seeks certification.

Exhibit C-1 "Annual Reports"

Independent Energy Consultants, Inc. is a privately held corporation, and as such, does not produce Annual Reports.

Exhibit C-2 “SEC Filings”

Independent Energy Consultants, Inc. is a privately held corporation, and as such, does not produce or file 10-K/8-K, 10-Q, etc., Reports with the Securities Exchange Commission.

Exhibit C-3 “Financial Statements”

Independent Energy Consultants, Inc. has filed this information Under Seal.

Exhibit C-4 “Financial Arrangements”

Independent Energy Consultants, Inc. does not need to rely on outside financial arrangements to conduct its business as a Natural Gas Broker and Aggregator. Independent Energy Consultants, Inc. is an energy-management consulting firm and does not take title to or trade energy, nor is it a capital intensive business.

Independent Energy Consultants, Inc. maintains business checking accounts with Chase and Huntington Banks in Aurora, Ohio.

Independent Energy Consultants, Inc. has business debit and credit cards with Chase Bank, and a Staples Office Supply credit card.

Exhibit C-5 “Forecasted Financial Statements”

Independent Energy Consultants, Inc. has filed this information Under Seal.

Exhibit C-6 “Credit Rating”

As a privately held S Corporation, Independent Energy Consultants, Inc. does not possess a published credit rating.

Exhibit C-7 “Credit Report”

The credit report for Independent Energy Consultants, Inc. as provided by Experian is provided on the following two pages.

Independent Energy Consultants, Inc. and the company owners possess an unblemished corporate and personal credit history.

Independent Energy Consultants, Inc. Renewal Application for Retail Natural Gas Broker & Aggregator
Exhibit C-7 "Credit Rating"

ProfilePlusSM Report

as of: 03/10/16 10:03 ET

Independent Energy Consultants, Inc

Address: 215 W Garfield Rd Ste 210
Aurora, OH 44202-8849
United States

Phone: 330-995-2675

Website: naturalgas-electric.com

Experian BIN: 750177526

Agent: Ct Corporation System

Agent Address: 4701 Cox RD Ste 285
Glen Allen, VA

Key Personnel: Mark R Burns
Regina M Burns

SIC Code: 8742-Management Consulting Services
8748-Business Consulting Services, Nec

NAICS Code: 541612-Human Resources Consulting Services
541618-Other Management Consulting Services

Business Type: Corporation

Experian File Established: April 2004

Experian Years on File: 12 Years

Years in Business: 34 Years

Total Employees: 2

Sales: \$150,000

Filing Data Provided by: Ohio

Date of Incorporation: 05/14/2004

This location does not yet have an estimated Days Beyond Terms (DBT), or a Payment Trend Indicator. This is often the result of too few Payment Tradelines.

Payment Tradelines (see [charts](#), [detail](#)): 2

UCC Filings: 0

✓ **Businesses Scoring Worse:** 92%

✓ **Bankruptcies:** 0


✓ **Liens:** 0

✓ **Judgments Filed:** 0

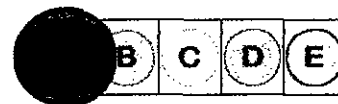
✓ **Collections:** 0

Credit Summary

Credit Ranking Score: 93

High Risk  Low Risk

The objective of the Credit Ranking Score is to predict payment behavior. High Risk means that there is a significant probability of delinquent payment. Low Risk means that there is a good probability of on-time payment.

Triple Score Business ReportTM - Experian Score

Your Experian score is: A

On average, businesses with an Experian score of "A" are considered "Low risk" and have a 1.4% chance of severely delinquent payments (90+ days), or bankruptcy within the next 12 months.

[What is an Experian score?](#)

Key Score Factors:

- Number of recently active commercial accounts.
- Length of time on experian's file.
- Ratio of total bal to total high bal across all comm acct.

Recommended Action: Low Risk

Insufficient information to produce
Monthly Payment Trends
chart.

Insufficient information to produce
Quarterly Payment Trends
chart.

Insufficient information to produce
Continuous Payment Trends
chart.

Insufficient information to produce
Newly Reported Payment Trends
chart.

Insufficient information to produce
Combined Payment Trends
chart.

Number of Accounts: 1
Present Balance: \$0
Highest Balance: \$0

Number of Accounts: 0
Present Balance: \$0
Highest Balance: \$0

Number of Accounts: 1
Present Balance: \$0
Highest Balance: \$0

Trade Payment Information

Trade Payment Experiences

Supplier Category	Reported Date	Activity Date	Payment Terms	Recent High Credit	Balance Current	Up to 30 DBT	31-60 DBT	61-90 DBT	>90 DBT	Comments
Offc Suppl	02/16	01/10	Credit							Acctclosed

Additional Payment Experiences

Supplier Category	Reported Date	Activity Date	Payment Terms	Recent High Credit	Balance Current	Up to 30 DBT	31-60 DBT	61-90 DBT	>90 DBT	Comments
Bank Card	03/16		Revolve	\$13,600	\$900					

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Exhibit C-8 “Bankruptcy Information”

Independent Energy Consultants, Inc. is a debt-free service corporation. It has never filed for reorganization or bankruptcy protection.

Exhibit C-9 “Merger Information”

Independent Energy Consultants, Inc. became an Ohio corporation in April 2004. Neither it nor its principals have ever been involved in a corporate dissolution, merger or acquisition.

Exhibit D-1 “Operations”

As a broker and aggregator Independent Energy Consultants, Inc. targets its consulting services to two types of clients; Governmental Aggregators, and Commercial and Industrial customers. For Governmental Aggregators, Independent Energy Consultants, Inc. provides from start to finish all of the steps needed to design, implement and administer a program. Those steps will include but not be limited to:

- Assisting a community in preparing and filing an ordinance to put the opt-out aggregation issue on the ballot;
- Draft a Plan of Operation and Governance;
- Assist with the completion and filing of client’s PUCO Certification Application;
- Conduct Public Hearings;
- Prepare Request for Proposal (RFP);
- Analyze supplier bids and make recommendations to community leaders;
- Review of Supplier Agreements;
- Design Opt-Out Notification Forms;
- Identify Eligible Customers through various data scrubbing techniques;
- Assist with the Customer Switching Process;
- Provide ongoing assistance during the life of the program;
- Prepare client’s quarterly and annual reports to the PUCO;
- Prepare quarterly reports to community leaders to track progress; and
- Keep clients aware of any utility and/or regulatory changes that could impact their program.

For commercial and industrial customers, Independent Energy Consultants, Inc. provides among other things:

- Gather and analyze client’s load data;
- Analyze for proper rate code classification;
- Prepare and issue a customized RFP to all qualified suppliers;
- Negotiate with suppliers;
- Assist in the completion of Supplier and LDC contract paperwork;
- Assist in the customer switching process;
- Audit bills;
- Provide ongoing client support during the term of the agreement.

Exhibit D-2 “Operations Expertise”

Independent Energy Consultants, Inc. provides consulting services to assist customers in making wise decisions concerning their natural gas supply. It provides this advice for governmental aggregation buying groups and to individual commercial and industrial customers. In providing this service, the company at no time will own title to natural gas. It does not purchase natural gas for sale or resale.

Independent Energy Consultants, Inc. is very familiar with the Local Distribution Company Rules and PUCO regulations for doing business in Ohio's natural gas markets. As an aggregator and broker we have experience working with LDC forms and supplier contracts to effectively broker deals in Ohio's Choice programs and traditional Transportation programs.

Mr. Burns has experienced all stages of the customers support “life cycle” here in Ohio's natural gas markets. That life cycle includes, but is not limited to: (i) customer inquiry, (ii) customer acquisition, (iii) customer load data assembly and analysis, (iv) supplier negotiation and selection, (v) customer switching (vi) ongoing customer support and finally (vii) customer renewal.

Finally, Mr. Burns has provided Risk Management oversight to a \$1 billion electric and gas trading operation. He uses that experience to help clients understand and manage their risk exposure when making decisions concerning their natural gas purchase agreements.

Exhibit D-3 “Key Technical Personnel”

Mark R. Burns
President
mburns@naturalgas-electric.com
(330) 995-2675 x301
(Resume attached)

Andrew M. Burns
Operations Manager
aburns@naturalgas-electric.com
(330) 995-2675 x302
(Resume attached)

Anne Czerwinski
Governmental Aggregation Manager
annec@naturalgas-electric.com
(330) 995-2675 x304
(Resume attached)

Rebecca Bergdorf
Analyst
rbergdorf@naturalgas-electric.com
(330) 995-2675 x303
(Resume attached)

Exhibit D-3 “Key Technical Personnel”

Mark R. Burns
President, Independent Energy Consultants, Inc.

Education:

- Master of Business Administration - Baldwin-Wallace College, 1993.
- Bachelor of Electrical Engineering Technology - Youngstown State University, 1982.
- 25 years extensive training and professional development

Certifications and Licenses:

- Public Utilities Commission of Ohio Electric Broker and Aggregator (04-116E(6))
- Public Utilities Commission of Ohio Natural Gas Broker and Aggregator (04-078G(6))
- Virginia State Corporation Commission Electric and Natural Gas Aggregator (A-17)
- Illinois Commerce Commission Licensed Agent/Broker/Consultant Electricity
- Public Utilities Commission of Texas licensed Aggregator of Electric (80-252)
- Formerly licensed Senior Reactor Operator from the Nuclear Regulatory Commission (SOP-30781)
- AEE Certified Energy Manager
- Certified Thermographer

Experience:

- Possesses 25-years broad background experience in engineering and management in the Electric and Natural Gas industries
- Expertise includes providing energy brokerage and aggregation services for governments, and commercial and industrial customers
- Conducting energy efficiency audits and facility energy benchmarking
- Utility tariff analysis and utility bill auditing
- Operational, financial, and credit risk management
- Founder of two successful energy consulting services companies
- Designed, implemented and administered Governmental Aggregation Programs (natural gas and electric) that form the basis of over 100 community relationships in Ohio.
- Risk Control oversight of a \$1 Billion Gas and Electric trading group (FirstEnergy Corporation)
- Utility Company Strategic Planning Manager (Centerior Energy)
- Shift Manager Davis-Besse Nuclear Power Station (Toledo Edison)
- Instrument and Control Engineer Davis-Besse Nuclear Power Station (Toledo Edison)
- Electrical Test Engineer of Naval Nuclear Submarines (Newport News Shipbuilding)

Exhibit D-3 “Key Technical Personnel”

Anne Czerwinski
Governmental Aggregation Manager, Independent Energy Consultants, Inc.

Independent Energy Consultants, Inc

May 2014 -Present

Governmental Aggregation Manager – responsibilities include:

- Prepare and email quarterly reports to active clients
- Prepare PUCO Market Monitor Reports
- Prepare and file clients' annual report with the PUCO
- Prepare and file PUCO certification and renewal documents for clients
- Maintain FileMaker Pro database of potential and current clients
- Review Supplier Opt-Out Notifications for accuracy
- Geocode customer lists to ensure supplier mailing accuracy
- Update company website

Senior Analyst - responsibilities include:

Feb 2011 – May 2014

- Prepare and email quarterly reports to active clients
- Prepare PUCO Market Monitor Reports
- Prepare and file clients' annual report with the PUCO
- Prepare and file PUCO certification and renewal documents for clients
- Prepare and distribute company sales material to potential clients
- Maintain an Access database of potential and current clients
- Prepare and email natural gas and electric price quotes to clients
- Update company website
- Audit utility bills

Analyst - responsibilities include:

Feb 2009 – Feb 2011

- Prepare and distribute company sales material to potential clients
- Maintain an Access database of potential and current clients
- Prepare and email natural gas and electric price quotes to clients
- Update company website
- Audit utility bills

Training and Proficiency:

- EnergyCAP software training – Energy Accounting and Utility Bill Auditing
- Proficient in Microsoft Office Products; Word, Excel, PowerPoint, Access
- Natural Gas Market Fundamentals Training
- Electric Markets Fundamentals Training Targeted Opportunities Program:
- PJM Basics 101

Exhibit D-3 “Key Technical Personnel”

Andrew Burns
Operations Manager, Independent Energy Consultants, Inc.

Independent Energy Consultants, Inc.

Operations Manager-responsibilities include: **2013 - Present**

- Prepare Price Quotes for Clients
- Analyze Supplier Bids and Prepare Decision Support Models for Clients
- Preparation and distribution of marketing material to current and prospective customers
- Responding to Requests for Proposals
- Monthly newsletter writing and distribution
- Attendance at trade shows
- Competitive market intelligence gathering and database maintenance
- Create and foster relationships with suppliers
- Oversee maintenance of pricing matrixes for U.S. deregulated energy markets
- Maintain company CRM system

Analyst- responsibilities include: **2008 - 2012**

- Maintenance of databases and EnergyCAP auditing software
- Drafting of company newsletters
- Price model maintenance and quote preparation

Education:

- Bachelor of Arts Degree – Biology. Hiram College **2008 – 2012**
 - Studied abroad in the Galapagos Islands
 - Assisted in novel genetic research of American Beech trees

Training:

- EnergyCAP Training – Energy Accounting and Bill Auditing
- MS Office software training
- Natural Gas Market Fundamentals Training
- Electric Markets Fundamentals Training
- Business Writing for Results
- Social Media Marketing
- PJM Fundamentals Training

Exhibit D-3 “Key Technical Personnel”

**Rebecca Bergdorf
Analyst**

Independent Energy Consultants, Inc.

May 2012-Present

Analyst - responsibilities include:

- Utility bill auditing
- Maintain client Energy Accounting System
- Commission report auditing
- Follow up with potential new clients
- Maintain social media forums
- Prepare material for docketing with the State Regulators
- Maintain general office functions as assigned by company president

Parker Hannifin Corporation

Aug. 2011- April 2012

- Quality Control
- Warehousing

Chrysler Corporation – Twinsburg Stamping

Aug. 1995- June 2010

Traffic and Billing Clerk

- Generating invoices and bills of lading for transportation purposes
- Scheduling for steel delivery
- Troubleshooting with others to resolve billing errors and issues
- Order expediting
- Auditing of bills
- Recording and analyzing data

Education – Bachelor’s Degree in Education, University of Akron

May 1999

Training and Certifications

- Natural Gas Market Fundamentals Training
- Electric Markets Fundamentals Training
- EnergyCAP Training – Energy Accounting and Utility Bill Auditing
- Microsoft Office Software Training
- Business Writing for Results
- Social Media Marketing
- PJM Fundamentals Training
- Microsoft Excel 2010 Intermediate