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EDF ENERGY SERVICES

4700 West Sam Houston Parkway North, Suite 250
Houston, Texas, TX 77041
T +1 281 781 0333
F +1 281 781 0360

February 3, 2017

Public Utilities Commission of Ohio,
Attn: Docketing Division
180 East Broad Street,
Columbus, Ohio 43215-3793

PUCO

2017 FEB - 7 PM 12:25

Re: Company Name: EDF ENERGY SERVICES LLC
Certification Case No.: 13-0327-EL-CRS
Certificate Expiration Date: 3/8/2017

To Whom It May Concern:

Please find enclosed the original and three (3) copies of EDF Energy Services, LLC's Renewal Application for Retail Generation Providers and Power Marketers with all attachments and exhibits as required. If you should have any questions or concerns regarding this renewal application, please contact Angela Gregory, Regulatory Affairs at 281-653-1039.

Best regards,

C. Alexis Keene, J.D., C.P.A.
SVP and General Counsel, North America

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 RC Date Processed FEB 07 2017

Original CRS Case Number	Version
13- 327 -EL-CRS	May 2016

RENEWAL APPLICATION FOR RETAIL GENERATION PROVIDERS AND POWER MARKETERS

Please print or type all required information. Identify all attachments with an exhibit label and title (Example: Exhibit C-10 Corporate Structure). 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 input information directly onto the form.
You may also download the form, by saving it to your local disk, for later use.**

A. RENEWAL INFORMATION

A-1 Applicant intends to be renewed as: (check all that apply)

- | | |
|---|---------------------------------------|
| <input type="checkbox"/> Retail Generation Provider | <input type="checkbox"/> Power Broker |
| <input checked="" type="checkbox"/> Power Marketer | <input type="checkbox"/> Aggregator |

A-2 Applicant's legal name, address, telephone number, PUCO certificate number, and web site address

Legal Name EDF Energy Services, LLC
 Address 4700 W. Sam Houston Parkway N., Suite 250, Houston, TX 77041
 PUCO Certificate # and Date Certified 13-644E (1) certified on 3/11/2013
 Telephone # (281) 781-0333 Web site address (if any) www.edfenergyservices.com

A-3 List name, address, telephone number and web site address under which Applicant does business in Ohio

Legal Name EDF Energy Services, LLC
 Address 4700 W. Sam Houston Parkway N., Suite 250, Houston, TX 77041
 Telephone # (281) 781-0333 Web site address (if any) www.edfenergyservices.com

A-4 List all names under which the applicant does business in North America
EDF Energy Services, LLC

A-5 Contact person for regulatory or emergency matters

Name Angela Gregory
Title Manager, Regulatory Affairs
Business address 4700 W. Sam Houston Pkwy N., Suite 250, Houston, TX 77041
Telephone # (281) 653-1039 Fax # _____
E-mail address angela.gregory@edfenergyservice

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

Name Cherie Fuller
Title Vice President
Business address 4700 W. Sam Houston Pkwy N., Suite 250, Houston, TX 77041
Telephone # (281) 653-1778 Fax # (281) 653-1436
E-mail address cherie.fuller@edfenergyservices.c

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

Customer Service address 4700 W. Sam Houston Pkwy N., Suite 250, Houston, TX
Toll-free Telephone # (877) 432-4530 Fax # _____
E-mail address _____

A-8 Applicant's federal employer identification number # 461487926

A-9 Applicant's form of ownership (check one)

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

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

A-10 Exhibit A-10 "Principal Officers, Directors & Partners" provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.

B. MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- B-1** Exhibit B-1 "Jurisdictions of Operation," provide a 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 or wholesale electric services.
- B-2** Exhibit B-2 "Experience & Plans," provide a 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 4928.10 of the Revised Code.
- B-3** Exhibit B-3 "Disclosure of Liabilities and Investigations," provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation 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 it is seeking to be certified to provide.
- B-4** Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.
☒ No ☐ Yes

If yes, provide a separate attachment labeled as Exhibit B-4 "Disclosure of Consumer Protection Violations" detailing such violation(s) and providing all relevant documents.

- B-5** Disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail or wholesale electric service denied, curtailed, suspended, revoked, or cancelled within the past two years.
☒ No ☐ Yes

If yes, provide a separate attachment labeled as Exhibit B-5 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation" detailing such action(s) and providing all relevant documents.

C. 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 in Exhibit C-1 or indicate that Exhibit C-1 is not applicable and why. (This is generally only applicable to publicly traded companies who publish annual reports.)

- C-2 Exhibit C-2 “SEC Filings,”** provide the most recent 10-K/8-K Filings with the SEC. If the applicant does not have such filings, it may submit those of its parent company. An applicant may submit a current link to the filings or provide them in paper form. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that 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. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns (with social security numbers and account numbers redacted).
- C-4 Exhibit C-4 “Financial Arrangements,”** provide copies of the applicant's financial arrangements to conduct CRES as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.,).

Renewal applicants can fulfill the requirements of Exhibit C-4 by providing a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU’s collateral requirements.

First time applicants or applicants whose certificate has expired as well as renewal applicants can meet the requirement by one of the following methods:

1. The applicant itself stating that it is investment grade rated by Moody’s, Standard & Poor’s or Fitch and provide evidence of rating from the rating agencies.
2. Have a parent company or third party that is investment grade rated by Moody’s, Standard & Poor’s or Fitch guarantee the financial obligations of the applicant to the LDU(s).
3. Have a parent company or third party that is not investment grade rated by Moody’s, Standard & Poor’s or Fitch but has substantial financial wherewithal in the opinion of the Staff reviewer to guarantee the financial obligations of the applicant to the LDU(s). The guarantor company’s financials must be included in the application if the applicant is relying on this option.
4. Posting a Letter of Credit with the LDU(s) as the beneficiary.

If the applicant is not taking title to the electricity or natural gas, enter "N/A" in Exhibit C-4. An N/A response is only applicable for applicants seeking to be certified as an aggregator or broker.

- C-5 **Exhibit C-5 “Forecasted Financial Statements,”** provide two years of forecasted income statements for the applicant’s **ELECTRIC related business activities in the state of Ohio Only**, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer. The forecasts should be in an annualized format for the two years succeeding the Application year.
- C-6 **Exhibit C-6 “Credit Rating,”** provide a statement disclosing the applicant’s credit rating as reported by two of the following organizations: Duff & Phelps, Fitch IBCA, Moody’s Investors Service, Standard & Poor’s, 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 an 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. If an applicant or its parent does not have such a credit rating, enter “N/A” in Exhibit C-6.
- C-7 **Exhibit C-7 “Credit Report,”** provide a copy of the applicant’s credit report from Experian, Dun and Bradstreet or a similar organization. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter “N/A” for Exhibit C-7.
- 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 within the two most recent years preceding the application.
- C-9 **Exhibit C-9 “Merger Information,”** provide a statement describing any dissolution or merger or acquisition of the applicant within the two most recent years preceding the application.
- C-10 **Exhibit C-10 “Corporate Structure,”** provide a description of the applicant’s corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.

D. TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- D-1 Exhibit D-1 "Operations"** provide a written description of the operational nature of the applicant's business. Please include whether the applicant's operations include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.
- D-2 Exhibit D-2 "Operations Expertise,"** given the operational nature of the applicant's business, provide evidence of the applicant's experience and technical expertise in performing such operations.
- D-3 Exhibit D-3 "Key Technical Personnel,"** provide the names, titles, e-mail addresses, telephone numbers, and the background of key personnel involved in the operational aspects of the applicant's business.
- D-4 Exhibit D-4 "FERC Power Marketer License Number,"** provide a statement disclosing the applicant's FERC Power Marketer License number. (Power Marketers only)

C. G. Keene.

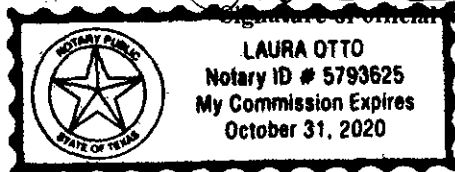
Signature of Applicant and Title
C. Alexis Keene, SVP/General Counsel

Sworn and subscribed before me this 3rd day of February, 2017
Month Year

Laura Otto

Laura Otto, Sr. Paralegal

Print Name and Title



Signature of official administering oath

My commission expires on 10/31/2020

AFFIDAVIT

State of Texas :

Houston ss.
(Town)

County of Harris :

C. Alexis Keene, Affiant, being duly sworn/affirmed according to law, deposes and says that:

She is the SVP, General Counsel (Office of Affiant) of EDF Energy Services, LLC (Name of Applicant);

That he/she is authorized to and does make this affidavit for said Applicant,

1. The Applicant herein, attests under penalty of false statement that all statements made in the application for certification renewal are true and complete and that it will amend its application while the application is pending if any substantial changes occur regarding the information provided in the application.
2. The Applicant herein, attests it will timely file an annual report with the Public Utilities Commission of Ohio of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Division (A) of Section 4905.10, Division (A) of Section 4911.18, and Division (F) of Section 4928.06 of the Revised Code.
3. The Applicant herein, attests that it will timely pay any assessments made pursuant to Sections 4905.10, 4911.18, or Division F of Section 4928.06 of the Revised Code.
4. The Applicant herein, attests that it will comply with all Public Utilities Commission of Ohio rules or orders as adopted pursuant to Chapter 4928 of the Revised Code.
5. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, and its Staff on any utility matter including the investigation of any consumer complaint regarding any service offered or provided by the Applicant.
6. The Applicant herein, attests that it will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
7. The Applicant herein, attests that it will fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
8. The Applicant herein, attests that it will use its best efforts to verify that any entity with whom it has a contractual relationship to purchase power is in compliance with all applicable licensing requirements of the Federal Energy Regulatory Commission and the Public Utilities Commission of Ohio.
9. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, the electric distribution companies, the regional transmission entities, and other electric suppliers in the event of an emergency condition that may jeopardize the safety and reliability of the electric service in accordance with the emergency plans and other procedures as may be determined appropriate by the Commission.
10. If applicable to the service(s) the Applicant will provide, the Applicant herein, attests that it will adhere to the reliability standards of (1) the North American Electric Reliability Council (NERC), (2) the appropriate regional reliability council(s), and (3) the Public Utilities Commission of Ohio. (Only applicable if pertains to the services the Applicant is offering)

11. The Applicant herein, attests that it will inform the Commission of any material change to the information supplied in the renewal application within 30 days of such material change, including any change in contact person for regulatory purposes or contact person for Staff use in investigating customer complaints.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief and that he/she expects said Applicant to be able to prove the same at any hearing hereof.

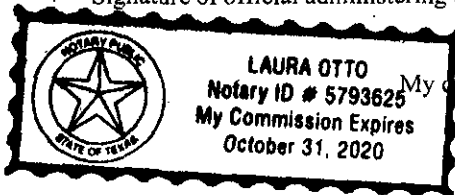
C. A. Keene
Signature of Affiant & Title

C. Alexis Keene, SVP/General Counsel

Sworn and subscribed before me this 3rd day of February, 2017
Month Year

Laura Otto
Signature of official administering oath

Laura Otto, Sr. Paralegal
Print Name and Title



My commission expires on 10/31/2020

Exhibit A-10 "Principal Officers, Directors & Partners" provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.

Officer	Title	Address	Phone
John Rittenhouse	Chief Executive Officer	80 Victoria Street London SW1E 5JL	44 20 7061 4001
Brett McCarroll	Senior Vice President Finance, Operations, Tax and Treasury	4700 W. Sam Houston Pkwy N. Suite 250 Houston TX 77041	281-781-0333
Mary Anne Brelinsky	President	4700 W. Sam Houston Pkwy N. Suite 250 Houston TX 77041	281-781-0333
C. Alexis Keene	Senior Vice President, General Counsel	4700 W. Sam Houston Pkwy N. Suite 250 Houston TX 77041	281-781-0333

B. MANAGERIAL CAPABILITY AND EXPERIENCE

Exhibit B-1 “Jurisdictions of Operation,” provide a 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 or wholesale electric services.

Applicate and affiliates provide electric sales as follows:

1. EDF Energy Services, LLC (the Applicant) – has FERC electricity market-based rate authority; and is authorized to sells retail electricity to large industrial customers in the following States:
 - a. Ohio
 - b. Texas
 - c. Pennsylvania
 - d. Illinois
 - e. Connecticut
 - f. Delaware
 - g. District of Columbia
 - h. Maine
 - i. Maryland
 - j. Massachusetts
 - k. Michigan
 - l. New Hampshire
 - m. New Jersey
 - n. New York
 - o. Oregon
 - p. Rhode Island
 - q. Virginia
2. EDF Industrial Power Services (CA), LLC – Sells retail electricity to large industrial customers in State of California. This entity has FERC electricity market-based rate authority.
3. EDF Trading North America, LLC has FERC electricity market-based rate authority and is authorized to sell wholesale electricity in the following jurisdictions:
 - a. WECC
 - b. PJM
 - c. MISO
 - d. ERCOT
 - e. NYISO
 - f. NEPOOL
 - g. SERC
 - h. CAISO

Exhibit B-2
"Experience & Plans"

PROPRIETARY AND CONFIDENTIAL
FILED UNDER SEAL

Exhibit B-3 "Disclosure of Liabilities and Investigations," provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation 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 it is seeking to be certified to provide.

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

C. FINANCIAL CAPABILITY AND EXPERIENCE

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 in Exhibit C-1 or indicate that Exhibit C-1 is not applicable and why. (This is generally only applicable to publicly traded companies who publish annual reports.)

Not Applicable. The Applicant is a private company and is not required to file an annual report.

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

Not Applicable. The Applicant is a private company and is not required to file with the SEC

Exhibit C-3
"Financial Statements"

PROPRIETARY AND CONFIDENTIAL
FILED UNDER SEAL

Exhibit C-3 PROPRIETARY AND CONFIDENTIAL ---FILED UNDER SEAL

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. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns (with social security numbers and account numbers redacted).

See attached Exhibit C-3 "Financial Statements".

Exhibit C-4
"Financial Arrangements"

PROPRIETARY AND CONFIDENTIAL
FILED UNDER SEAL

Exhibit C-5

"Forecasted Financial Statements"

**PROPRIETARY AND CONFIDENTIAL
FILED UNDER SEAL**

Exhibit C-6
"Credit Rating"

PROPRIETARY AND CONFIDENTIAL
FILED UNDER SEAL

Exhibit C-7 “Credit Report,” provide a copy of the applicant's credit report from Experian, Dun and Bradstreet or a similar organization. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter “N/A” for Exhibit C-7.

Applicant's DUNS number is 788707847. The Applicant receives credit support from EDF Trading Limited that maintains an A3 rating by Moody's Investors Services, Inc. Please see Exhibit C-4.

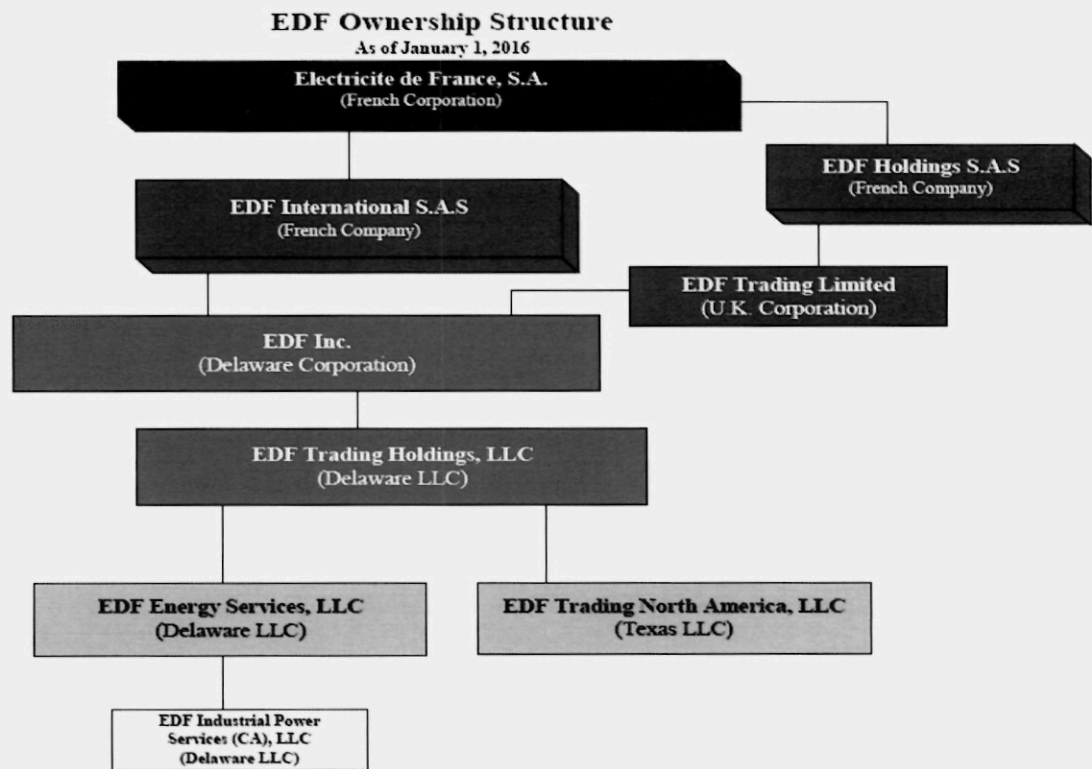
Exhibit C-8 “Bankruptcy Information,” provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.

Not applicable

Exhibit C-9
"Merger Information"

PROPRIETARY AND CONFIDENTIAL
FILED UNDER SEAL

Exhibit C-10 “Corporate Structure,” provide a description of the applicant’s corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.



D. TECHNICAL CAPABILITY

Exhibit D-1 “Operations” provide a written description of the operational nature of the applicant's business. Please include whether the applicant's operations include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.

The Applicant sells retail electricity to large industrial customers in the state of Ohio. It will not generate power for retail sales; however, it purchases electricity from both its parent company, EDF Trading North America, LLC and the PJM Interconnection LLC. EDF Trading North America, LLC also provides personnel to manage all scheduling activities in the Ohio market. These employees have extensive knowledge of scheduling retail power in ERCOT, PJM, MISO, NYISO and CAISO. The provision of ancillary services is from the PJM Interconnection LLC. The applicant utilizes an existing letter of credit by EDF Trading Limited with PJM to satisfy its PJM-related credit requirements.

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

EDF Energy Services, LLC currently supplies approximately 3,500 megawatts of aggregated peak load to large industrial customers across the 17 states we are licensed. The Applicant utilizes these experienced resources to manage all aspects of its retail operations in the Ohio market.

Exhibit D-3 “Key Technical Personnel,” provide the names, titles, e-mail addresses, telephone numbers, and the background of key personnel involved in the operational aspects of the applicant’s business.

Cherie Fuller is Vice President Retail for EDF Energy Services. Cherie joined the EDF Commercial and Industrial team in 2011 as Director, after spending the prior 14 years in various wholesale and retail energy roles at Dynegy and Fulcrum Energy including power scheduling, transmission trading and business development. In 2015 Cherie’s role was expanded to include responsibility for the East Retail C&I portfolio including business development, contracting, switching, customer service, regulatory, transaction management, reporting and invoicing. Cherie is active in the Gulf Coast Power Association’s Empowering Women initiative and has a BA from Salisbury University.

Robert Louisy is Vice President of Operations and Accounting for EDF Energy Services. He is responsible for managing several teams for Energy Services including the retail projects, confirmations, settlements and retail billing teams for power and gas, across all the markets that EDFES is currently licensed in. Robert also manages a credit team that oversees the underwriting of retail load deals, monitors the performance of the wholesale supply to retail provider business, and on-boards EMA assets in conjunction with the EMA settlements team. Prior to this, Robert recently worked at Hudson Energy and Constellation Energy, supporting the operations functions for their U.S. and Canadian based businesses. During this time, Robert built high performing operations teams that supported the mid and back office functions across credit, billing, transaction, contract, and revenue management. Robert started his career working at the AESO in Alberta, Canada and has held senior positions in a range of ventures including an energy billing firm, and an energy brokerage and consulting firm. Robert earned his Master’s from the University of Calgary in Strategy and Finance.

Chris Armitage, Senior Vice President, Energy Optimization, joined EDF in 2003 and prior to that, was at Dynegy, Inc. in a variety of management positions within its power businesses. At EDFT, Chris was Head of East Power Trading for 5 years and is now Head of all energy management and operational optimization with EDF Energy Services. His responsibilities include overseeing asset optimization, fuel management, load and resource management, risk management, and transmission optimization. Chris has over ten years of experience managing assets, customer needs and trading in the Southeast, Midwest, Northeast and Atlantic Coast. Chris has a degree in finance and economics from the University of Western Ontario.

Exhibit D-4 “FERC Power Marketer License Number,” provide a statement disclosing the applicant’s FERC Power Marketer License number. (Power Marketers only)

EDF Energy Services, LLC was granted electricity market-based rate authority in FERC Docket No. ER16-00325-001.