

FILE

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|-----------------------------|----------|
| Original CRS<br>Case Number | Version  |
| 11 - 5326-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 checked="" 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 Interstate Gas Supply, Inc.  
Address 6100 Emerald Parkway  
PUCO Certificate # and Date Certified 11-403E(2) 10/30/2013, 11-403E(3) 11/3/15  
Telephone # (614) 659-6500 Web site address (if any) www.igsenergy.com

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

Legal Name Interstate Gas Supply, Inc.  
Address 6100 Emerald Parkway, Dublin Oh 43016  
Telephone # (614) 659-5000 Web site address (if any) www.igsenergy.com

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PUCO

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 MN Date Processed SEP 05 2017

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

Interstate Gas Supply Inc.  
IGS Energy

**A-5 Contact person for regulatory or emergency matters**

Name Michael Nugent  
Title Regulatory Attorney, Regulatory & Compliance  
Business address 6100 Emerald Parkway, Dublin OH 43016  
Telephone # (614) 659-5065 Fax # (614) 659-5070  
E-mail address mnugent@igsenergy.com

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

Name Tara Chapman  
Title Compliance Manager  
Business address 6100 Emerald Parkway, Dublin OH 43016  
Telephone # (614) 659-5058 Fax # (855) 726-3542  
E-mail address tchapman@igsenergy.com

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

Customer Service address 6100 Emerald Parkway, Dublin Ohio 43016  
Toll-free Telephone # (800) 280-4474 Fax # (614) 659-5005  
E-mail address choice@igsenergy.com

**A-8 Applicant's federal employer identification number # 311286758**

**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 type="checkbox"/> Limited Liability Company (LLC) |
| <input checked="" 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.

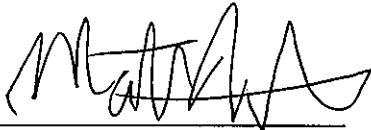
If the applicant is not taking title to the electricity or natural gas, enter “N/A” in Exhibit C-4. An N/A response is only applicable for applicants seeking to be certified as an aggregator or broker.

- 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)



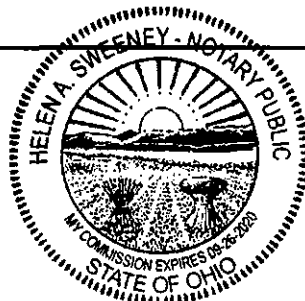
Signature of Applicant and Title

Sworn and subscribed before me this 31st day of August, 2017  
Month Year

  
Signature of official administering oath

Helena A. Sweeney, Notary Public  
Print Name and Title

My commission expires on 09-26-2020

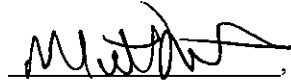


# **AFFIDAVIT**

State of Ohio :

Dublin ss.  
(Town)

County of Franklin :



, Affiant, being duly sworn/affirmed according to law, deposes and says that:

He/She is the General Counsel (Office of Affiant) of Intestate Gas Supply (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.

[Signature]  
Signature of Affiant & Title

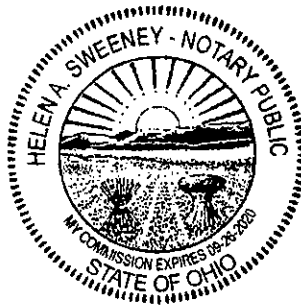
Sworn and subscribed before me this 31st day of August, 2017  
Month

Year

[Signature]  
Signature of official administering oath

Helen A. Sweeney, Notary Public  
Print Name and Title

My commission expires on 09-26-2020





**PUBLIC VERSION**

**TRADE SECRETS, CONFIDENTIAL AND PROPRIETARY INFORMATION**

**CERTIFICATION FOR COMPETITIVE RETAIL ELECTRIC SUPPLIER**

**Exhibits**

**Section A – Applicant Information and Services, Attachments and Explanations.**

**A-10 Exhibit A-12 “Principal Officers, Directors & Partners,”** provide the names, titles, addresses and telephone number of the applicant’s principal officers, directors, partners, or other similar officials.

**Response:** Scott White, President, 6100 Emerald Parkway, Dublin, OH 43016  
Work phone number: (614) 659-5000  
Doug Austin, Vice President, 6100 Emerald Parkway, Dublin, OH 43016  
Work phone number: (614) 659-5000  
Laurie Kruppa, Shareholder, 6100 Emerald Parkway, Dublin, OH 43016  
Work phone number: (614) 659-5000  
Cathy Conner, Shareholder, 6100 Emerald Parkway, Dublin, OH 43016  
Work phone number: (614) 659-5000  
Matt White, General Counsel, 6100 Emerald Parkway, Dublin, OH 43016 Work phone number: (614) 659-5049  
Tami Wilson, Chief Financial Officer, 6100 Emerald Parkway, Dublin, OH 43016 Work phone number: (614) 659-5000  
Steve White, Shareholder, 378 Knollwood Dr., Charleston, WV 35302  
Work phone number: (304) 546-4584

**A-11 Exhibit A-11 “Corporate Structure,”** provide a description of the applicant’s corporate structure, including a graphical description 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.

**Response:** IGS Ventures, Inc. (“IGS Ventures,” an active Ohio corporation), is a privately held corporation that owns 100% of the outstanding shares of the Applicant, Interstate Gas Supply, Inc. (“IGS,” an active Ohio corporation). IGS owns 100% of the membership interests in Accent Energy Group, LLC (“AEG,” an active Delaware limited liability company), which in turn owns 100% of the membership interests in the following subsidiaries: Accent Energy California LLC (an active Delaware limited liability company), Accent Energy Midwest Gas LLC (an active Delaware limited liability company), Accent Energy Midwest II LLC (an active Delaware limited liability company), Accent Energy TX GP LLC (“AEGP,” an active Delaware limited liability company), and Accent Energy TX LP LLC (“AELP,” an active Delaware limited liability company). AEGP and AELP collectively own 100% of the partnership interests in Accent Energy Texas LP (an active Delaware limited partnership). All of the Accent Energy affiliates under AEG supply retail natural gas or electricity to customers in North America. IGS also owns 100% of the outstanding shares of IGS Dayton, Inc. (an active Ohio corporation) IGS Dayton, Inc, supplies retail Electric to customers in North America. IGS Ventures, Inc., owns 100% of the membership interests in IGS Distributed Generation, LLC (an active Ohio limited liability company), which in turn owns 100% of the membership interests in IGS Solar, LLC (“IGS Solar,” an active Ohio limited liability company). IGS Solar supplies behind the meter retail electricity to customers in North America. See the attached graphical description of the above structure.

## **Section B – Applicant’s Managerial Capability and Experience**

**B-1 Exhibit B-1 “Jurisdiction 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.

**Response:** IGS and its affiliates are currently certified, licensed, registered, or otherwise authorized to supply electricity service in Illinois, Pennsylvania, Maryland, Ohio, Michigan, New York, Massachusetts and Texas.

**B-2 Exhibit B-2 “Experience and 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 the Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

**Response:** IGS has a wealth of experience supplying natural gas and/or electricity to customers in multiple states behind multiple utilities. IGS invests significantly to continually improve its IT infrastructure, call center capabilities, and employee development. IGS employs dozens of full-time associates tasked with responding to customer inquiries. IGS believes that it has one of the most responsive and timely call centers in the industry, focused on first-call resolution. Billing functions continue to be handled by the local utilities. IGS continues to have a dedicated compliance manager devoted to responding to inquiries from Commission Staff and other consumer advocate agencies

**B-3 Exhibit B-5 “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.

**Response:** IGS has no existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, or any other matter that could adversely impact its financial or operational status or ability to provide electric services. IGS has and continues to be a financially sound company with a strong balance sheet, and has never had a judgment against it or a license threatened or revoked.

**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.

X 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.

X 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.

## **Section C – Applicant Financial Capability and Experience**

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

**Response:** IGS is not a publicly traded company and therefore does not prepare annual reports. However, see response to C-3.

**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.

**Response:** IGS is not a publicly traded company and, therefore does not prepare or file any documents with the Securities and Exchange Commission. However, see response to C-3.

**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.

**Response:** See Exhibit C-3, PRIVILEGED and CONFIDENTIAL attached hereto and incorporated herein by reference. **SUCH RESPONSES ARE FILED UNDER SEAL**

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

**Response:** See Exhibit C-4, PRIVILEGED AND CONFIDENTIAL, attached hereto and incorporated herein by reference. **SUCH RESPONSES ARE FILED UNDER SEAL**

**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 CRES operation, along with a list of assumptions, and the name, address, email address and telephone number of the preparer.

**Response:** The response to C-5 requires disclosure of information about IGS that is PRIVILEGED AND CONFIDENTIAL. **SUCH RESPONSES ARE FILED UNDER SEAL.**

**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 affiliated organization, provided the applicant submits a statement signed by the principal officer of the applicant's 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.

**Response:** IGS is a privately held company and does not have an independent credit rating from any of the organizations

**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.

**Response:** See Exhibit C-7 Duns and Bradstreet credit report, attached and herein by reference.

**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.

**Response:** None.

**C-9 Exhibit C-9 "Merger Information,"** provide a statement describing any dissolution or merger or acquisition of the applicant within the five most recent years preceding the application.

**Response:**

Effective January 01, 2016, Applicant acquired DPL Energy Resources Inc. ("DLPER"). DLPER is an electric supplier in the territories identified in this renewal certificate.

## **Section D – Applicant Technical Capabilities**

**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 will 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.

**Response:** IGS is a natural gas and electric marketing company that serves small commercial and residential customers across the country. IGS specializes in the purchasing, transportation, and risk management of gas and electric supply. IGS has no plans to generate power for retail sales, but schedules retail power for transmission and delivery, and provides 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.

**Response:** IGS has significant experience in managing residential and commercial customer business through its involvement in Choice programs across the country. Since its entry into those Choice programs, IGS has grown its customer base from zero to currently more than 1,000,000 natural gas and electric customers. IGS manages all the operational requirements associated with the purchasing, transportation, nominations, and sales that are required in its service territories.

**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.

**Response**

**Tami Wilson** is Chief Financial Officer. Tami provides financial leadership and strategy for IGS. She is responsible for the financial functions for the organization's different lines of business as well as capital allocation and investment strategy for new ventures. She is responsible for regulatory and legislative strategy for the organization as well as Commodity Operations and Risk Management functions. With more than 13 years of executive leadership experience in the deregulated gas markets, Tami is a certified public accountant, a member of the AICPA, and holds a Bachelor’s degree in Accounting from the University of Evansville.

Contact Info: [Twilson@igsenergy.com](mailto:Twilson@igsenergy.com), 614-659-5964

**Matt S. White, Esq.,** is General Counsel, Regulatory and Legislative Affairs for IGS. Matt’s duties include responsibility for all regulatory and related legal issues as well as all legislative initiatives for IGS. He also oversees the natural gas and electric litigation and other activities on behalf of IGS at state and federal regulatory bodies throughout the country. Matt is a graduate of Ohio University, and obtained his Juris Doctorate and Masters in Business Administration from the College of William Mary.

Contact Info: [Mwhite@igsenergy.com](mailto:Mwhite@igsenergy.com), 614-659-5049

**Andy Dosch** is Director of Finance. His responsibilities include financial reporting, treasury and cash management, credit and collections, tax, general accounting, risk administration and controls. He has over 23 years of public accounting and industry experience, including nearly 11 years at KPMG. Prior experience includes serving as Vice President and Chief Financial Officer of a publicly-traded company. Andy is a CPA and is a graduate of Muskingum College, with Bachelor's degrees in Accounting and Business.

Contact Info: [Adosch@igsenergy.com](mailto:Adosch@igsenergy.com), 614-659-5145

**Timothy J. Hamilton** is Power Supply Director. He is responsible for IGS’ power supply and risk management, as well as power pricing, load forecasting, power purchasing and scheduling behind more than twenty utilities in ERCOT, NYISO and PJM. He has over 20 years of experience in the retail energy industry. Prior to IGS, Tim was a Senior Vice President at Accent Energy. Tim managed the daily operations of Accent’s electricity and natural gas procurement, scheduling, pricing, settlements and risk management functions. Tim is a graduate of The Pennsylvania State University.

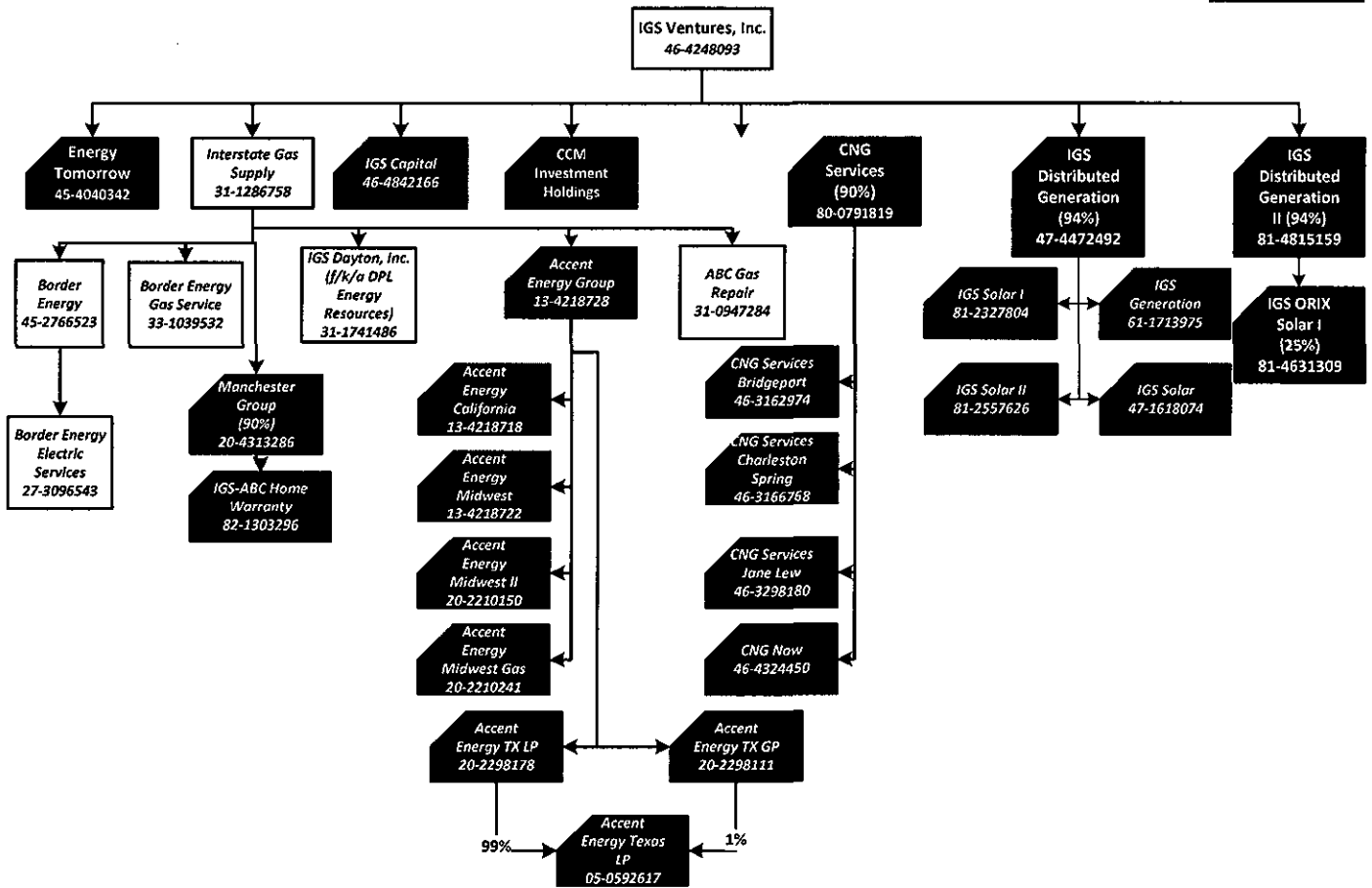
Contact Info: [Thamiton@igsenergy.com](mailto:Thamiton@igsenergy.com), 614-659-5153

**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)

**Response:** FERC Docket #ER11-4037  
Market Based Rate Authority  
Dated September 13, 2011

## Exhibit A-11 Corporate Structure

# IGS Legal Entity Hierarchy



Legend



## Exhibit C-3 Financial Statements

PRIVILEGED AND CONFIDENTIAL



## Exhibit C-4 Financial Arrangements

PRIVILEGED AND CONFIDENTIAL

## Exhibit C-5 Forecasted Financial Statements

PRIVILEGED AND CONFIDENTIAL

## Exhibit C-7 Credit Report

## Live Report : INTERSTATE GAS SUPPLY, INC.


D-U-N-S® Number: 62-605-8655

Trade Names: INTERSTATE GAS SUPPLY - IGS ENERGY





Endorsement/Billing Reference: jmorris@igsenergy.com

| D&B Address    |   | Added to Portfolio: 04/21/2014 |                       |
|----------------|---|--------------------------------|-----------------------|
| <b>Address</b> | 6100 Emerald Pkwy<br>Dublin, OH, US - 43016 | <b>Location Type</b>           | Single Location       |
| <b>Phone</b>   | 614 659-5000                                | <b>Web</b>                     | www.igsenergy.com     |
| <b>Fax</b>     |   | <b>Last View Date:</b>         | 02/23/2015            |
|                |   | <b>Endorsement :</b>           | jmorris@igsenergy.com |

## Company Summary

Currency: Shown in USD unless otherwise indicated 

### Score Bar

|                                      |   |            |   |
|--------------------------------------|---|------------|---|
| <b>PAYDEX®</b>                       |    | <b>73</b>  | Paying 11 days past due                             |
| <b>Commercial Credit Score Class</b> |    | <b>2</b>   | Low to Moderate Risk of severe payment delinquency. |
| <b>Financial Stress Score Class</b>  |   | <b>3</b>   | Moderate Risk of severe financial stress.           |
| <b>Commercial Credit Score</b>       |  | <b>534</b> | Low to Moderate Risk of severe payment delinquency. |

### D&B Company Overview

Do not confuse with interstate gas marketing, inc, columbus, oh and Interstate Gas Supply of Indiana, Inc which is out of business.  
This is a single location

|                         |   |
|-------------------------|---|
| <b>Chief Executive</b>  | SCOTT L WHITE,<br>PRES                        |
| <b>Year Started</b>     | 1989  |
| <b>Employees</b>        | 170   |
| <b>Financing</b>        | SECURED                                       |
| <b>SIC</b>              | 1311  |
| <b>Line of business</b> | Crude petroleum/<br>natural gas<br>production |
| <b>NAICS</b>            | 211111  |
| <b>History Status</b>   | CLEAR   |

### FirstRain Company News



This Company is not currently tracked for Company News

Powered by FirstRain

### Financial Overview



Based on your financial statement preference setting and the availability of financial data from the sources, no financial statements are available.

### Public Filings

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

| Number of | Most Recent |
|-----------|-------------|
|-----------|-------------|

| Record Type  | Records | Filing Date |
|--------------|---------|-------------|
| Bankruptcies | 0       | -           |
| Judgments    | 0       | -           |
| Liens        | 0       | -           |
| Suits        | 0       | -           |
| UCCs         | 28      | 12/11/14    |



The public record items contained herein may have been paid, terminated, vacated or released prior to today's date.

## Predictive Scores

Currency: Shown in USD unless otherwise indicated 

### D&B Viability Rating Summary

The D&B Viability Rating uses D&B's proprietary analytics to compare the most predictive business risk indicators and deliver a highly reliable assessment of the probability that a company will go out of business, become dormant/inactive, or file for bankruptcy/insolvency within the next 12 months. The D&B Viability Rating is made up of 4 components:

|  |                             |                |                 |
|--|-----------------------------|----------------|-----------------|
|   | <b>Viability Score</b>      | Lowest Risk: 1 | Highest Risk: 9 |
| <p><b>Compared to All US Businesses within the D&amp;B Database:</b></p> <ul style="list-style-type: none"> <li>• Level of Risk: <b>Low Risk</b></li> <li>• Businesses ranked 3 have a probability of becoming no longer viable: <b>3 %</b></li> <li>• Percentage of businesses ranked 3: <b>15 %</b></li> <li>• Across all US businesses, the average probability of becoming no longer viable: <b>14 %</b></li> </ul>  |                             |                |                 |
|   | <b>Portfolio Comparison</b> | Lowest Risk: 1 | Highest Risk: 9 |
| <p><b>Compared to All US Businesses within the same MODEL SEGMENT:</b></p> <ul style="list-style-type: none"> <li>• Model Segment : <b>Established Trade Payments</b></li> <li>• Level of Risk: <b>Low Risk</b></li> <li>• Businesses ranked 3 within this model segment have a probability of becoming no longer viable: <b>3 %</b></li> <li>• Percentage of businesses ranked 3 with this model segment: <b>11 %</b></li> <li>• Within this model segment, the average probability of becoming no longer viable: <b>5 %</b></li> </ul> |                             |                |                 |

## Data Depth Indicator

Predictive Data:A    Descriptive Data:G

### Data Depth Indicator:

- ✓ Rich Firmographics
- ✓ Extensive Commercial Trading Activity
- ✓ Basic Financial Attributes

Greater data depth can increase the precision of the D&B Viability Rating assessment.

## Company Profile

| Financial Data | Trade Payments       | Company Size | Years in Business |
|----------------|----------------------|--------------|-------------------|
| Not Available  | Available (3+ Trade) | Large        | Established       |

### Company Profile Details:

- Financial Data: **Not Available**
- Trade Payments: **Available (3+ Trade)**
- Company Size: **Large** (Employees: 50+ or Sales: \$500K+)
- Years in Business: **Established (5+)**

### Credit Capacity Summary

This credit rating was assigned because of D&B's assessment of the company's creditworthiness. For more information, see the D&B Rating Key

D&B Rating : **1R3**

Number of employees: 1R indicates 10 or more employees  
Composite credit appraisal: 3 is fair

The 1R and 2R ratings categories reflect company size based on the total number of employees for the business. They are assigned to business files that do not contain a current financial statement. In 1R and 2R Ratings, the 2, 3, or 4 creditworthiness indicator is based on analysis by D&B of public filings, trade payments, business age and other important factors. 2 is the highest Composite Credit Appraisal a company not supplying D&B with current financial information can receive.

Below is an overview of the company's rating history since 07-26-1995

| D&B Rating | Date Applied |
|------------|--------------|
| 1R3        | 09-03-2014   |
| 1R2        | 04-16-2013   |
| 1R3        | 01-10-2013   |
| 1R2        | 04-17-2007   |
| 5A1        | 11-03-2004   |
| 5A2        | 11-26-2003   |
| 4A2        | 06-18-2003   |
| 4A3        | 10-04-2000   |
| 3A2        | 07-28-1995   |
| --         | 07-26-1995   |

Sales: 1,400,000,000.00  
Number of Employees Total: 170

Payment Activity: (based on 56 experiences)  
Average High Credit: 22,030  
Highest Credit: 400,000  
Total Highest Credit: 960,200

### D&B Credit Limit Recommendation

Conservative credit Limit 85,000  
Aggressive credit Limit: 200,000

**Risk category for this business :**

**LOW**

The Credit Limit Recommendation (CLR) is intended to serve as a directional benchmark for all businesses within the same line of business or industry, and is not calculated based on any individual business. Thus, the CLR is intended to help guide the credit limit decision, and must be balanced in combination with other elements which reflect the individual company's size, financial strength, payment history, and credit worthiness, all of which can be derived from D&B reports.

Risk is assessed using D&Bs scoring methodology and is one factor used to create the recommended limits. See Help for details.

### **Financial Stress Class Summary**

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The Financial Stress Score predicts the likelihood of a firm ceasing business without paying all creditors in full, or reorganization or obtaining relief from creditors under state/federal law over the next 12 months. Scores were calculated using a statistically valid model derived from D&Bs extensive data files.

The Financial Stress Class of 3 for this company shows that firms with this class had a failure rate of 0.24% (24 per 10,000), which is lower than the average of businesses in D & B's database

**Financial Stress Class : 3**  (Lowest Risk:1; Highest Risk:5)

Moderately lower than average risk of severe financial stress, such as a bankruptcy or going out of business with unpaid debt, over the next 12 months.

#### **Probability of Failure:**

Risk of Severe Financial Stress for Businesses with this Class: **0.24 %** (24 per 10,000)

Financial Stress National Percentile : **43** (Highest Risk: 1; Lowest Risk: 100)

Financial Stress Score : **1468** (Highest Risk: 1,001; Lowest Risk: 1,875)

Average Risk of Severe Financial Stress for Businesses in D&B database: **0.48 %** ( 48 per 10,000)

#### **The Financial Stress Class of this business is based on the following factors:**

Composite credit appraisal is rated fair.

UCC Filings reported.

High number of inquiries to D & B over last 12 months.

Low proportion of satisfactory payment experiences to total payment experiences.

High proportion of past due balances to total amount owing.

**Notes:**

The Financial Stress Class indicates that this firm shares some of the same business and financial characteristics of other companies with this classification. It does not mean the firm will necessarily experience financial stress.

The Probability of Failure shows the percentage of firms in a given Class that discontinued operations over the past year with loss to creditors. The Probability of Failure - National Average represents the national failure rate and is provided for comparative purposes.

The Financial Stress National Percentile reflects the relative ranking of a company among all scorable companies in D&B's file.

The Financial Stress Score offers a more precise measure of the level of risk than the Class and Percentile. It is especially helpful to customers using a scorecard approach to determining overall business performance.

| Norms                       | National % |
|-----------------------------|------------|
| This Business               | 43         |
| Region: EAST NORTH CENTRAL  | 50         |
| Industry: NATURAL RESOURCES | 61         |
| Employee range: 100-499     | 75         |
| Years in Business: 26+      | 77         |

This Business has a Financial Stress Percentile that shows:

Higher risk than other companies in the same region.

Higher risk than other companies in the same industry.

Higher risk than other companies in the same employee size range.

Higher risk than other companies with a comparable number of years in business.

### Credit Score Summary

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The Commercial Credit Score (CCS) predicts the likelihood of a business paying its bills in a severely delinquent manner (91 days or more past terms).

The Credit Score class of 2 for this company shows that 2.5% of firms with this class paid one or more bills severely delinquent, which is lower than the average of businesses in D & B's database.

**Credit Score Class : 2**  Lowest Risk:1;Highest Risk :5

### Incidence of Delinquent Payment

Among Companies with this Classification: **2.50 %**

Average compared to businesses in D&B's database: **10.20 %**

Credit Score Percentile : **74** (Highest Risk: 1; Lowest Risk: 100)

Credit Score : **534** (Highest Risk: 101; Lowest Risk:670)

The Credit Score Class of this business is based on the following factors:

Proportion of slow payments in recent months

Proportion of past due balances to total amount owing

**Notes:**

The Commercial Credit Score Risk Class indicates that this firm shares some of the same business and financial characteristics of other companies with this classification. It does not mean the firm will necessarily experience severe delinquency.

The Incidence of Delinquent Payment is the percentage of companies with this classification that were reported 91 days past due or more by creditors. The calculation of this value is based on D&B's trade payment database.

The Commercial Credit Score percentile reflects the relative ranking of a firm among all scorable companies in D&B's file.

The Commercial Credit Score offers a more precise measure of the level of risk than the Risk Class and Percentile. It is especially helpful to customers using a scorecard approach to determining overall business performance.

| Norms                       | National % |
|-----------------------------|------------|
| This Business               | 74         |
| Region: EAST NORTH CENTRAL  | 54         |
| Industry: NATURAL RESOURCES | 72         |



Employee range: 100-499 89  
Years in Business: 26+ 85

This business has a Credit Score Percentile that shows:


Lower risk than other companies in the same region.

Lower risk than other companies in the same industry.

Higher risk than other companies in the same employee size range.

Higher risk than other companies with a comparable number of years in business.

## Public Filings

Currency: Shown in USD unless otherwise indicated 

### Summary

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

| Record Type            | # of Records | Most Recent Filing Date |
|------------------------|--------------|-------------------------|
| Bankruptcy Proceedings | 0            | -                       |
| Judgments              | 0            | -                       |
| Liens                  | 0            | -                       |
| Suits                  | 0            | -                       |
| UCCs                   | 28           | 12/11/14                |

The following Public Filing data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

### Government Activity

#### Activity summary

|  |    |
|--|----|
| Borrower (Dir/Guar)                    | NO |
| Administrative Debt                    | NO |
| Contractor                             | NO |
| Grantee                                | NO |
| Party excluded from federal program(s) | NO |

#### Possible candidate for socio-economic program consideration

|                     |            |
|---------------------|------------|
| Labour Surplus Area | N/A        |
| Small Business      | YES (2015) |
| 8(A) firm           | N/A        |

The details provided in the Government Activity section are as reported to Dun & Bradstreet by the federal government and other sources.

## History & Operations

Currency: Shown in USD unless otherwise indicated 

### Company Overview

Company Name: INTERSTATE GAS SUPPLY, INC.

|                                   |   |
|-----------------------------------|---|
| <b>Doing Business As :</b>        | INTERSTATE GAS SUPPLY ,<br>IGS ENERGY                           |
| <b>Street Address:</b>            | 6100 Emerald Pkwy<br>Dublin , OH 43016                          |
| <b>Phone:</b>                     | 614 659-5000  |
| <b>URL:</b>                       | <a href="http://www.igsenergy.com">http://www.igsenergy.com</a> |
| <b>History</b>                    | Is clear  |
| <b>Present management control</b> | 26 years  |
| <b>Annual Sales</b>               | 1,400,000,000   |

## History

The following information was reported: **09/08/2014**

|                    |   |
|--------------------|---|
| <b>Officer(s):</b> | SCOTT L WHITE, PRES<br>DOUG AUSTIN, EXEC V PRES<br>JIM BAICH, COO<br>LARRY FRIEDEMANN, V PRES<br>NICOLE SHIRING, V PRES |
|--------------------|---|

|                      |                |
|----------------------|----------------|
| <b>DIRECTOR(S) :</b> | THE OFFICER(S) |
|----------------------|----------------|

The Ohio Secretary of State's business registrations file showed that Interstate Gas Supply, Inc., was registered as a Corporation on August 9, 1989.

Business started 1989 by Scott L White. 100% of capital stock is owned by officers.

SCOTT L WHITE born 1964. 1989-present active here.

DOUG AUSTIN. Antecedents are unknown.

JIM BAICH. Antecedents are unknown.

LARRY FRIEDEMANN. Antecedents are unknown.

NICOLE SHIRING. Antecedents are unknown.

Business address has changed from 5020 Bradenton Ave, Dublin, OH, 43017 to 6100 Emerald Pkwy, Dublin, OH, 43017.

## Business Registration

CORPORATE AND BUSINESS REGISTRATIONS REPORTED BY THE SECRETARY OF STATE OR OTHER OFFICIAL SOURCE AS OF

Sep 04 2015

|                                |   |
|--------------------------------|---|
| <b>Registered Name:</b>        | INTERSTATE GAS SUPPLY, INC.   |
| <b>Business type:</b>          | CORPORATION   |
| <b>Corporation type:</b>       | PROFIT  |
| <b>Date incorporated:</b>      | Aug 09 1989   |
| <b>State of incorporation:</b> | OHIO  |
| <b>Filing date:</b>            | Aug 09 1989   |
| <b>Registration ID:</b>        | 754636  |
| <b>Status:</b>                 | ACTIVE  |
| <b>Where filed:</b>            | SECRETARY OF STATE/CORPORATIONS DIVISION , COLUMBUS , OH<br>CWS AGENCY CORPORATION , 65 E STATE ST; SUITE 1000 , COLUMBUS<br>, OH , 432150000 |
| <b>Registered agent:</b>       | Agent appointed: Oct 28 2003<br>AgentStatus: ACTIVE   |
| <b>Principals:</b>             | SCOTT L WHITE , INCORPORATOR  |

## Operations

09/08/2014

Produces natural gas (100%).

**Description:** ADDITIONAL TELEPHONE NUMBER(S): Toll-Free 888 995-0992.

Terms are Net 30 days. Sells to commercial concerns. Territory : United States.

Nonseasonal.

**Employees:** 170 which includes officer(s).

**Facilities:** Owns 100,000 sq. ft. in a single story building.

**Location:** Suburban business section on side street.

## **SIC & NAICS**

### **SIC:**

Based on information in our file, D&B has assigned this company an extended 8-digit SIC. D&B's use of 8-digit SICs enables us to be more specific about a company's operations than if we use the standard 4-digit code.

The 4-digit SIC numbers link to the description on the Occupational Safety & Health Administration (OSHA) Web site. Links open in a new browser window.

1311 0102 Natural gas production

### **NAICS:**

211111 Crude Petroleum and Natural Gas Extraction

## **Banking**

08/15 Loans granted to low 8 figures on a secured basis. Now owing low 8 figures. Collateral consists of Matures in 1 to 5 years.

(Same bank) Loans granted to moderate 8 figures on a secured basis. Now owing nothing. Collateral consists of accounts receivable and inventory, fixtures and equipment. Matures in 1 to 5 years.

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