



Public Utilities Commission

PUCO USE ONLY - Version 1.08 May 2016		
Date Received	Renewal Certification Number	ORIGINAL CRS Case Number
		02-1683- GA-CRS

FILE

RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS SUPPLIERS

Please type or print all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit A-15 - 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 ☒ Retail Natural Gas Marketer

A-2 Applicant information:

Legal Name Interstate Gas Supply, Inc.
Address 6100 Emerald Parkway, Dublin Ohio 43016
Telephone No. (614) 659-5000 Web site Address www.igsenergy.com
Current PUCO Certificate No. 02-002G Effective Dates 7/27/12, 7/25/2014, 7/28/2016

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

Name Interstate Gas Supply, Inc.
Address 6100 Emerald Parkway, Dublin Ohio 43016
Web site Address www.igsenergy.com Telephone No. (614) 659-5000

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

Interstate Gas Supply, Inc. Accent Energy Midwest Gas
IGS Energy Accent Energy Midwest II

A-5 Contact person for regulatory or emergency matters:

Name Michael Nugent Title Regulatory Attorney
Business Address 6100 Emerald Parkway, Dublin Ohio 43016
Telephone No. (614) 659-5065 Fax No. (614) 659-5070 Email Address michael.nugent@igs.com

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RECEIVED-CONNECTIONS
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.
Date Processed 6/11/18
Technician [Signature]

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

Name Tara Chapman Title Compliance Manager
Business address 6100 Emerald Parkway, Dublin Ohio 43016
Telephone No. (614) 659-5058 Fax No. (614) 659-5066 Email Address tara.chapman@igs.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 No. (800) 280-4474 Fax No. (614) 659-5005 Email Address choice@igs.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 Matthew S. White Title General Counsel, Regulatory and Compliance
Business address 6100 Emerald Parkway, Dublin Ohio 43016
Telephone No. (614) 659-5049 Fax No. (614) 659-5070 Email Address matt.white@igs.com

A-9 Applicant's federal employer identification number 31-1286758

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

☒ **Dominion East Ohio**

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

☒ **Duke Energy Ohio**

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

☒ **Vectren Energy Delivery of Ohio**

<input checked="" type="checkbox"/>	Residential	Beginning Date of Service		End Date	
<input checked="" type="checkbox"/>	Small Commercial	Beginning Date of Service		End Date	
<input checked="" type="checkbox"/>	Large Commercial	Beginning Date of Service		End Date	
<input checked="" type="checkbox"/>	Industrial	Beginning Date of Service		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 "Company History,"** provide a concise description of the applicant's company history and principal business interests.
- A-16 **Exhibit A-16 "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-17 **Exhibit A-17 "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.
(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 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 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.)

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 **NATURAL GAS 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 current 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 current 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 within the two most recent years preceding the application.

SECTION D – APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

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

Applicant Signature and Title

Tamara Wilson, Chief Finance & Risk Officer

Sworn and subscribed before me this

6th

day of

June

Month

2018

Year

Ellen Lynn Teng

Signature of official administering oath

Ellen Lynn Teng, Notary

Print Name and Title

My commission expires on

June 2, 2019





The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service
Affidavit Form
(Version 1.07)

In the Matter of the Application of)

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

Case No. 02-1683 -GA-CRS

County of Franklin
State of Ohio

Tamara Wilson [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

Tamara Wilson Chief Finance & Risk Officer

Sworn and subscribed before me this

16th

day of

June

Month

2018

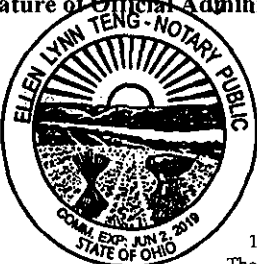
Year

Ellen Lynn Teng

Signature of Official Administering Oath

Ellen Lynn Teng, Notary

Print Name and Title



My commission expires on

June 2, 2019

Public Version

Trade Secrets, Confidential and Proprietary Information

Redacted

Renewal Certification for Retail Gas Supplier

Exhibits

SECTION A – Applicant Information and Services, Attached and Explanations.

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.

Response: Scott White, President,
6100 Emerald Parkway, Dublin Ohio 43016
Work Phone Number: (614)659-5000
Doug Austin, Executive Vice President,
6100 Emerald Parkway, Dublin Ohio 43016
Work Phone Number: (614)659-5000
Cathy Conner, Shareholder,
6100 Emerald Parkway, Dublin Ohio 43016
Work Phone Number: (614)659-5000
Tamara Wilson, Chief Finance and Risk Officer
6100 Emerald Parkway, Dublin Ohio 43016
Work Phone Number: (614)659-5000

A-15 Exhibit A-15 "Company History," provide a concise description of the applicant's company history and principal business interests.

Response: IGS is a privately held company founded in 1989 by Marv and Scott White. Co-founder Marv White was President and CEO of Columbus Gas Distribution Companies when the first unregulated of "self-help" natural gas program in the United States was implemented behind Columbia Gas of Ohio. Scott White has been intimately involved in the natural gas Industry since the inception of the company, for 28 years, and is one of the leaders in the natural gas deregulation.

IGS has pursued a deliberate and precise marketing and management strategy since its inception. IGS has worked diligently over the past few years to improve the Ohio natural gas market to bring additional benefits to Choice and Commercial and Industrial customer. IGS believes that controlled growth achieves the most positive and lasting results, and provides the greatest stability. As such, IGS has slowly expanded its participation in choice programs throughout the Midwest and East coast over the past several years and will continue to pursue a controlled growth strategy in the future. IGS has built its business on putting the customer first and will continue in the future.

A-16 Exhibit A-16 "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.*

Response: There have been no material changes to the Articles of Incorporation since the Original Filing.

A-17 Exhibit A-17 "Secretary of State," provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

Response: See Exhibit A-17, certificate of good standing for IGS.

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

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

Response: IGS is currently certified, licensed, registered or otherwise authorized to supply natural gas, either as IGS or through one of its affiliated companies in Ohio, Michigan, Illinois, Indiana, New York, Pennsylvania, Kentucky, Virginia, Maryland, New Jersey and California. IGS is currently certified, licensed, registered or otherwise authorized to supply electricity, either as IGS or through one of its affiliated companies in Ohio, Illinois New York, Pennsylvania, Maryland, New Jersey and Texas.

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.

Response: IGS has 28 years of experiences supplying natural gas to customer in multiple states behind multiple utilities. IGS has invested significantly over the past several years to continue to improve its IT infrastructure, call center capabilities and employee development. IGS employs dozens of full time personnel tasked with responding to customer inquiries. IGS believes that it has one of the most responsive and timely call center in the industry, focused on first call resolution. Billing functions for natural gas continue to be handled by the LDCs. IGS continues to have dedicated compliance manger devoted to responding to inquiries from staff, OCC and other organizations.

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.).

Response: IGS has 28 years of experience in natural gas supply and marketing industry, has a dedicated staff for risk management, supply, contract administration, operations and accounting

and serves hundreds of thousands of residential and small commercial customers in Ohio. IGS has active customer base behind all four of the Ohio utilities with choice programs, including Columbia Gas of Ohio, Duke Energy, Dominion Energy Ohio and Vectren.

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.

Response: IGS has no existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, financial or operational status or inability to provide services since its inception. IGS has and continues to be a financially sound company with a strong balance sheet, and has never had a judgement against it or a license threatened or revoked.

SECTION C - APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

C-1 Exhibit C-1 "Annual Reports," provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information, labeled as Exhibit C-1, or indicate that Exhibit C-1 is not applicable and why.
(This is generally only applicable to publicly traded companies who publish annual reports.)

Response: IGS is not a publicly traded company and, therefore does not prepare annual reports. However, see responses 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. 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.

Response: IGS is not a publicly traded company and as such is not required to file any documents with SEC, including but not limited to 10-K/8-K filings. 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. 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).

Response: The response to C-3 requires disclosure of information about IGS that is PRIVILEGED AND CONFIDENTIAL. SUCH RESPONSES ARE FILED UNDER SEAL.

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.)

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.

Response: The response to C-4 requires disclosure of information about IGS that is PRIVILEGED AND CONFIDENTIAL. SUCH RESPONSES ARE FILED UNDER SEAL.

C-5 Exhibit C-5 “Forecasted Financial Statements,” provide two years of forecasted income statements for the applicant's **NATURAL GAS 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.

Response: The response to C-4 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, 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.

Response: IGS is privately held company and does not have an independent credit rating from and of the aforementioned organizations.

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. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter “N/A” for Exhibit C-7.

Response: See Exhibit C-7 Dun and Bradstreet Credit report, attached and incorporated 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 two most recent years preceding the application.

Response: Effective August 21, 2017 IGS Energy acquired Talen Energy customer contracts in the Pennsylvania market. Talen Energy is an Electric Supplier in the Pennsylvania market.

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 within the two most recent years preceding the application.

Response: IGS Energy is a stand-alone Company.

SECTION D – APPLICANT TECHNICAL CAPABILITY

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

Response: IGS is a natural gas marketing company and as such IGS contracts for the supply of natural gas for ultimate delivery to its end use customers. IGS has over 50 relationships with producers of natural outside of Ohio, as well as a number of relationships with local producers. IGS also has risk management department that deals primarily with matching contracts with risk avoidance programs, including hedge, fixed price matches. IGS contracts for upstream pipeline capacity and storage in order to ensure that its firm customer’s gas is delivered. Also, where appropriate, IGS also takes an assignment of assets to ensure deliverability for its firm supply customers. IGS has supply and risk management teams with significant experience in natural gas procurement and supply dedicated to ensuring that its customers receive their natural gas from IGS.

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.

Response: IGS has a team of ten natural gas supply professionals dedicated to the daily task of procuring the needed quantities of natural gas from our various supply sources, both in and out of Ohio, and making nominations on inter and intra state pipelines consistent with the various utility tariff guidelines. Those detailed in response to D-3, below, have been with IGS 55 years collectively, and brought with them supply, nominations and procurement expertise from previous employment experiences. IGS has also developed a team of 4 additional people dedicated to risk management, dealing both with local and supply procurement, and contract risk management.

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.

Response:

Tom Scarpitti	Supply Manager (614) 659-5000	tom.scarpitti.@igs.com
Paul Leanza	Supply Manager (614) 659-5000	paul.leanza@igs.com
Laurie Kruppa	Supply & Schedule Analyst (614) 659-5000	laurie.kruppa@igs.com
Emily Kauffman	Operations Analyst (614) 659-5000	emily.kauffman@igs.com

Tom Scarpitti joined IGS in 2002 and has been supply manager for over 14 years, Tom worked for several years with Excerlon prior to joining IGS, primarily with the Chicago natural gas market. Tom has a BS from The Ohio State University in Business Administration, with a focus in Transportation and Logistics.

Paul Leanza joined IGS in 2003, and has been a supply manager for 14 years. Paul worked for AEP prior to joining IGS, primarily as a trader. Paul has a BS in Business Administration from The Ohio State University.

Laura Kruppa joined IGS in 1993 in the gas nominations capacity. Her experience includes nomination gas on all four major Ohio LDCs, as well as a numerous interstate pipelines.

Emily Kauffman has worked with IGS since 1998 in the Customer Choice Operations department. Her areas of expertise include communication with the data transfer to and from all utilities currently with Choice programs in place in Ohio, as well as analysis of customer data.

EXHIBIT A-17

OHIO SECRETARY OF STATE CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA
STATE OF OHIO
OFFICE OF THE SECRETARY OF STATE

I, Jon Husted, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show INTERSTATE GAS SUPPLY, INC., an Ohio corporation, Charter No. 754636, having its principal location in Columbus, County of Franklin, was incorporated on August 9, 1989 and is currently in GOOD STANDING upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 15th day of May, A.D. 2018.*

Jon Husted

Ohio Secretary of State

Validation Number: 201813501122

EXHIBIT C-3

REDACTED

EXHIBIT C-4

REDACTED

EXHIBIT C-5

REDACTED

EXHIBIT C-7

CREDIT REPORT

Disclaimer: The software and information ("Services") accessed herein were developed exclusively at private expense, and are proprietary to Dun & Bradstreet, Inc., and its affiliates and subsidiaries (collectively, "D&B"), and may include copyrighted works, trade secrets, or other materials created by D&B at great effort and expense.

If the Customer accessing the Services is part of the executive, legislative or judicial branches of the U.S. Federal Government, the Services contained herein are a Commercial Item as that term is defined in FAR 2.101, and are comprised of Technical Data, Computer Software and Computer Software Documentation as those terms are defined in FAR 52.227-14(a) and DFAR 252.227-13.

Customer's rights to use the Services are as described in the government contract signed between D&B and the Government.

Under no circumstances will the Customer accessing the Services have greater rights in the Services provided hereunder than "Limited Rights" as that term is defined in FAR 52.227-14 (ALT II) and DFAR 252.227-7013(f) and "Restricted Rights" as that term is defined in FAR 52.227-14 (ALT III) and DFAR 252.227-7014(f), respectively.

Live Report : INTERSTATE GAS SUPPLY, INC.

D-U-N-S® Number: 62-605-8655

Trade Names: INTERSTATE GAS SUPPLY - IGS ENERGY





Endorsement/Billing Reference: jstephens@igsenergy.com

D&B Address		Added to Portfolio: 04/21/2014	
Address	6100 Emerald Pkwy Dublin, OH, US - 43016	Location Type	Headquarters
Phone	614 659-5000	Web	www.igsenergy.com
Fax	614-659-5993	Last View Date:	04/27/2018
		Endorsement :	jstephens@igsenergy.com


Company Summary

Currency: Shown in USD unless otherwise indicated 

Score Bar


D&B Rating		1R3	1R indicates 10 or more Employees, Credit appraisal of 3 is fair
PAYDEX®		79	Paying 2 days past due
Commercial Credit Score Class		3	Moderate Risk of severe payment delinquency.
Financial Stress Score Class		3	Moderate Risk of severe financial stress.
Commercial Credit Score		488	Moderate Risk of severe payment delinquency.

D&B 3-month PAYDEX®

3-month D&B PAYDEX®: 78 
Lowest Risk:100;Highest Risk :1

When weighted by amount, Payments to suppliers
average 3 Days Beyond Terms

D&B PAYDEX®

D&B PAYDEX®: 79 
Lowest Risk:100;Highest Risk :1

When weighted by amount, Payments to suppliers
average 2 days beyond terms

D&B Company Overview

Do not confuse with interstate gas marketing, inc,

Public Filings

The following data includes both open and closed filings

columbus, oh and Interstate Gas Supply of Indiana, Inc which is out of business.

This is a headquarters location

Branch(es) or Division(s) exist Y	
Mailing Address	PO BOX 9060 DUBLIN, OH 43017
Chief Executive	SCOTT WHITE, PRES-CEO
Year Started	1989
Employees	190 (UNDETERMINED Here)
Financing	SECURED
SIC	1311
Line of business	Crude petroleum/ natural gas production
NAICS	211120
History Status	CLEAR

found in D&B's database on this company.

Record Type	Number of Records	Most Recent Filing Date
Bankruptcies	0	-
Judgments	0	-
Liens	0	-
Suits	1	01/26/17
UCCs	37	04/19/17

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

Financial Stress Score Class

Financial Stress Score Class: 3
Lowest Risk:1; Highest Risk :5

Commercial Credit Score Class

Commercial Credit Score Class: 3
Lowest Risk:1; Highest Risk :5

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:

3	Viability Score	Lowest Risk:1	Highest Risk:9
	Compared to All US Businesses within the D&B Database:		
<ul style="list-style-type: none">• Level of Risk: Low Risk• Businesses ranked 3 have a probability of becoming no longer viable: 3 %• Percentage of businesses ranked 3: 15 %• Across all US businesses, the average probability of becoming no longer viable: 14 %			

2	Portfolio Comparison	Lowest Risk:1	Highest Risk:9
----------	-----------------------------	----------------------	-----------------------

Compared to All US Businesses within the same MODEL SEGMENT:

- Model Segment : **Established Trade Payments**
- Level of Risk: **Low Risk**
- Businesses ranked 2 within this model segment have a probability of becoming no longer viable: **3 %**
- Percentage of businesses ranked 2 with this model segment: **16 %**
- Within this model segment, the average probability of becoming no longer viable: **5 %**

B	Data Depth Indicator	Predictive Data:A	Descriptive Data:G
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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.

G	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 Rating was changed on March 27, 2018 because of D & B's overall assessment of the company's financial, payment and history information.

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 06-18-2003

Sales: 1,400,000,000.00
Number of Employees Total: 190 (UNDETERMINED here)

D&B Rating	Date Applied
1R3	03-27-2018
-	08-09-2017
1R2	12-10-2015

1R3	09-03-2014	Payment Activity:	(based on 52 experiences)
1R2	04-16-2013	Average High Credit:	26,535
1R3	01-10-2013	Highest Credit:	500,000
1R2	04-17-2007	Total Highest Credit:	1,038,700
5A1	11-03-2004		
5A2	11-26-2003		
4A2	06-18-2003		

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	1	01/26/17
UCCs	37	04/19/17

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.

Suits

Status	Pending
DOCKET NO.	17CV000863
Plaintiff	CLOUD MARKETING INC.
Defendant	IGS ENERGY
Where filed	FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OH
Date status attained	01/26/17
Date filed	01/26/17
Latest Info Received	02/24/17

If it is indicated that there are defendants other than the report subject, the lawsuit may be an action to clear title to property and does not necessarily imply a claim for money against the subject.

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
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Small Business

YES (2018)

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.
Doing Business As :	INTERSTATE GAS SUPPLY , IGS ENERGY
Street Address:	6100 Emerald Pkwy Dublin , OH 43016
Mailing Address:	PO Box 9060 Dublin OH 43017
Phone:	614 659-5000
Fax:	614-659-5993
URL:	http://www.igsenergy.com
History	Is clear
Present management control	29 years
Annual Sales	1,400,000,000

History

The following information was reported: **03/27/2018**

Officer(s): SCOTT WHITE, PRES-CEO
DOUG AUSTIN, EXEC V PRES
JIM BAICH, COO
TAMI WILSON, CFO

DIRECTOR(S) : 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, under the file registration number 754636.

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

RECENT EVENT :

On January 25, 2016, sources stated that Interstate Gas Supply, Inc., Dublin, OH, doing business as IGS Energy, has completed the acquisition of DPL Energy Resources, Inc., Dayton, OH, on January 1, 2016. With the acquisition, DPL Energy Resources, Inc. will now operate as a subsidiary of Interstate Gas Supply, Inc. Employees and management were retained. Terms of transaction were not disclosed.

SCOTT WHITE. Antecedents not available.

DOUG AUSTIN. Antecedents not available.

JIM BAICH. Antecedents not available.

TAMI WILSON. Antecedents not available.

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

May 04 2018

Registered Name: INTERSTATE GAS SUPPLY, INC.
Business type: CORPORATION
Corporation type: PROFIT
Date incorporated: Aug 09 1989
State of incorporation: OHIO
Filing date: Aug 09 1989
Registration ID: 754636
Status: ACTIVE
Where filed: SECRETARY OF STATE/CORPORATIONS DIVISION , COLUMBUS , OH
Registered agent: C T CORPORATION SYSTEM , 4400 EASTON COMMONS WAY, SUITE 125 ,
COLUMBUS , OH , 432190000
Agent appointed: Aug 02 2017
AgentStatus: ACTIVE
Principals: SCOTT L WHITE , INCORPORATOR

Operations

03/27/2018

Produces natural gas (100%).

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

Nonseasonal.

Employees: 190 which includes officer(s). UNDETERMINED employed here.

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

Location: Suburban business section on side street.

Subsidiaries: The business has multiple subsidiaries, detailed subsidiary information is available in D & B linkage or family tree products.

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:

211120 Crude Petroleum Extraction

Banking

11/17 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 high 7 figures. Collateral consists of accounts receivable and inventory, fixtures and equipment. Matures in 1 to 5 years.

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