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

Auburn, July 31, 2018

RE: FREEDOM LOGISTICS, LLC --- PUCO Case No. 16-1754-EL-AGG

Please find attached one original and three copies of the renewal application and its relevant exhibits. Please be informed that we request financial information to be treated confidential, respective exhibits have therefore been stamped "confidential" and put into a separate envelop.

Should you need anything else please do not hesitate to let me know by e-mail at [Marianne.Vetter@felpower.com](mailto:Marianne.Vetter@felpower.com).

Sincerely,

A handwritten signature in black ink, appearing to read "M. Vetter", written over a horizontal line.

Marianne Vetter  
VP and Chief Administrative Officer

RECEIVED-DOCKETING DIV  
2018 AUG -3 PM 2:07  
PUCO

Freedom Energy Logistics  
5 Dartmouth Drive, Suite 301  
Auburn, NH 03032

603.625.2244

[www.felpower.com](http://www.felpower.com)

This is to certify that the images and prints are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician R Date Processed 8/3/18

Original AGG Case Number	Version
16-1754-EL-AGG	May 2016

## RENEWAL APPLICATION FOR ELECTRIC AGGREGATORS/POWER BROKERS

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 certified as: (check all that apply)

☒ Power Broker ☐ Aggregator

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

Legal Name Freedom Logistics, LLC  
 Address 5 Dartmouth Drive, Suite 301, Auburn, NH 03032  
 PUCO Certificate # and Date Certified 16-1126E(1) - September 23, 2016  
 Telephone # (603) 625-2244 Web site address (if any) www.felpower.com

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

Legal Name Freedom Logistics, LLC  
 Address 5 Dartmouth Drive, Suite 301, Auburn NH 03032  
 Telephone # (603) 625-2244 Web site address (if any) www.felpower.com

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

<u>Freedom Energy Logistics, LLC</u>	<u>PNE Energy Supply LLC d/b/a</u>
<u>Resident Power Nat.Gas and Electric</u>	<u>Power New England</u>
<u>Halifax-American Energy Co.</u>	

A-5 Contact person for regulatory or emergency matters

Name Marianne Vetter  
 Title VP and Chief Administrative Officer  
 Business address 5 Dartmouth Drive, Suite 301, Auburn NH 03032  
 Telephone # (603) 625-2244 Fax # (603) 625-8448  
 E-mail address Marianne.Vetter@felpower.com

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

Name Marianne Vetter  
Title VP and Chief Administrative Officer  
Business address 5 Dartmouth Drive, Suite 301, Auburn NH 03032  
Telephone # (603) 625-2244 Fax # (603) 625-8448  
E-mail address Marianne.Vetter@felpower.com

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

Customer Service address 5 Dartmouth Drive, Suite 301, Auburn NH 03032  
Toll-free Telephone # (877) 292-4232 Fax # (603) 625-8448  
E-mail address Info@felpower.com

**A-8 Applicant's federal employer identification number # 14-1975500**

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

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

**PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:**

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

**B. 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 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 including aggregation 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 including aggregation 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.).

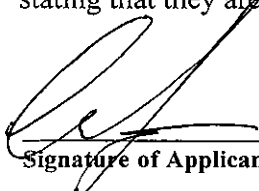
Renewal applicants can fulfill the requirements of Exhibit C-4 by providing a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU’s collateral requirements.

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.

 C.O.O.  
\_\_\_\_\_  
Signature of Applicant & Title

Sworn and subscribed before me this 26 day of July, 2018  
Month Year

\_\_\_\_\_  
Signature of official administering oath

Cameron Plante - Notary Public  
Print Name and Title



My commission expires on June 6, 2023

# **AFFIDAVIT**

State of NEW HAMPSHIRE

AUBURN ss.  
(Town)

County of HILLSBOROUGH

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

He/She is the C.O.O. (Office of Affiant) of FREEDOM LOGISTICS (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 fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
7. 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.
8. 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.
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] C.O.O.  
Signature of Affiant & Title

Sworn and subscribed before me this 26 day of July, 2018  
Month Year

[Signature]  
Signature of official administering oath

Cameron Plante - Notary Public  
Print Name and Title

My commission expires on June 6, 2023

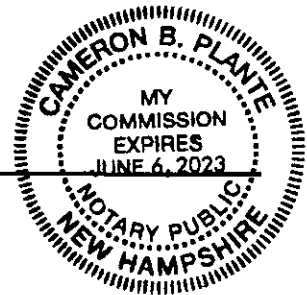




Exhibit B-1

**Jurisdictions of Operation**

**Freedom Logistics, LLC**

Maine

New Hampshire

Massachusetts

Connecticut

Rhode Island

Pennsylvania

Maryland

**PNE Energy Supply LLC – d/b/a Power New England**

Maine

New Hampshire

Massachusetts

Rhode Island

**Resident Power Natural Gas and Electric Solutions, LLC**

Maine

New Hampshire

Rhode Island

## Exhibit B-2

### **Experience and Plans**

Freedom Has provided electricity and natural gas brokering services in New England since 2007. We serve over 1,000 commercial customers across the deregulated markets/states, of all sizes. Our smallest customers are pizza shops and laundry mats, while our largest customers are defense contractors, education institutions and municipal governments.

Our President, August Fromuth, has served on numerous ISO and NEPOOL boards and committees and has at various times, served as Vice Chair of the End User Sector.

Freedom has approximately 1 billion kWh per year under management, making it one of the largest New Hampshire based energy brokers.

We work with almost every major electricity supplier in the New England market.

Freedom has approximately 27 employees, with approximately ½ serving in a sales capacity.

In Ohio we simply reach out to businesses, with potential to hire one or more local Ohio representative down the road.

Freedom only provides broker services and is not taking title of any electricity purchases or resales.

Exhibit B-3

**Disclosure of Liabilities and Investigations**

None – N/A

Exhibit C-1

**Annual Reports**

Not applicable (N/A) Freedom Logistics, LLC is a small private brokerage firm with sole proprietor.

Exhibit C-2

**SEC Filing**

Not applicable (N/A) *Freedom Logistics, LLC is not public.*

Exhibit C-3

**Financial Statements**

Please see in separate envelop – we request confidential treatment

Exhibit C-4

***Financial Arrangements***

Since Freedom Logistics, LLC is not taking title to electricity financial arrangements are not required.

Exhibit C-5

**Forecasted Financial Statements**

Not produced at this time

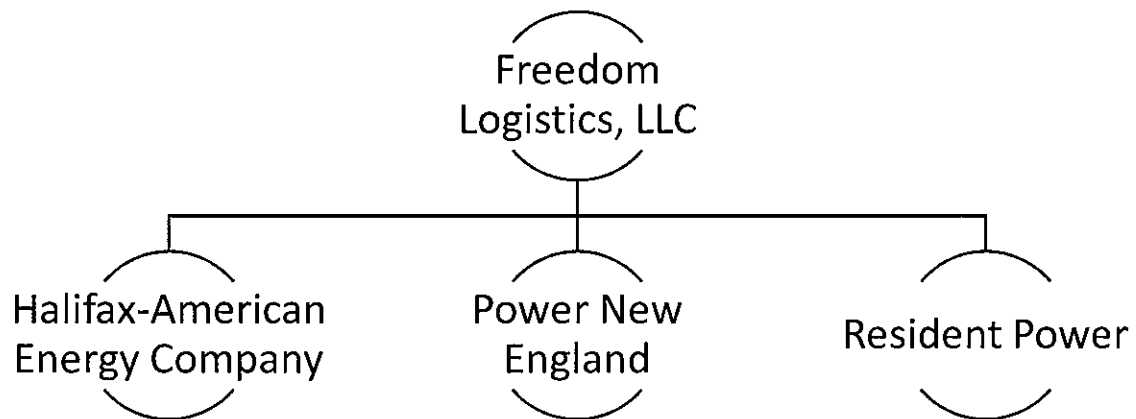


Exhibit C-6 / C-7 / C-8 / C-9

**Credit Rating / Credit Report / Bankruptcy Information / Merger Information**

Not Applicable - N/A

**Corporate Structure**



Freedom Energy Logistics, LLC (FEL) is the lead operating entity of several businesses in the retail energy sales space. In addition to the host, FEL consists of retail electric and natural gas brokerage units, project consulting, management of wholesale energy procurement for industrial and commercial End Users; and the affiliates: Halifax-American Energy Company (HAEC), Power New England (PNE), and Resident Power (RP).