

FILE

ORIGINAL

Ohio

Public Utilities
Commission

Original CRS Case Number	Version
00 - 1936-EL-CRS	May 2016

00-1936-EL-CRS

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)

- ☐ Retail Generation Provider
 ☐ Power Broker
☒ Power Marketer
 ☐ Aggregator

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

Legal Name Direct Energy Services, LLC
 Address 12 Greenway Plaza, Suite 250 - Houston, TX 77046
 PUCO Certificate # and Date Certified 00-019E / 12/02/2000
 Telephone # (713) 877-3500 Web site address (if any) www.directenergy.com

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

Legal Name Direct Energy Services, LLC
 Address 12 Greenway Plaza, Suite 250 - Houston, TX 77046
 Telephone # (713) 877-3500 Web site address (if any) www.directenergy.com

This is to certify that the above information is as accurate and correct as possible and that the document delivered in this regular course of business.
 Technician LDN Date Processed 10/19/18

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 PUCO

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

Direct Energy Services, LLC
Direct Energy

A-5 Contact person for regulatory or emergency matters

Name Teresa Ringenbach
Title Sr. Manager, Gov't & Regulatory Affairs
Business address 106 North High Street, Dublin, OH 43017
Telephone # (614) 633-6829 Fax # _____
E-mail address teresa.ringenbach@directenergy.com

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

Name Paige Harris
Title Regional Manager of Complaints
Business address 6502 S. Yale Avenue Suite 300 Tulsa, OK 74136
Telephone # (866) 670-6771 Fax # _____
E-mail address paige.harris@directenergy.com

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

Customer Service address 6502 S. Yale Avenue Suite 300 Tulsa, OK 74136
Toll-free Telephone # (888) 734-0741 Fax # (800) 457-9687
E-mail address csdirectenergy@directenergy.com

A-8 Applicant's federal employer identification number # 20-1340064

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

☐ Sole Proprietorship ☐ Partnership
☐ Limited Liability Partnership (LLP) ☒ Limited Liability Company (LLC)
☐ Corporation ☐ 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.

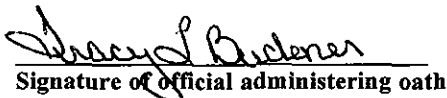
D. TECHNICAL CAPABILITY

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)

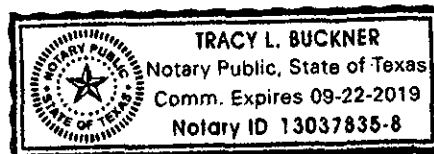

Signature of Applicant and Title

Sworn and subscribed before me this 9th day of October, 2018
Month Year


Signature of official administering oath

Tracy L. Buckner Notary Public
Print Name and Title

My commission expires on September 22, 2019



AFFIDAVIT

State of Texas :

Houston ss.
(Town)

County of Harris :

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

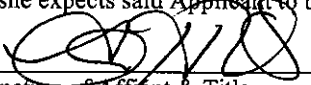
He/She is the ASST. TREASURER (Office of Affiant) of Dired Energy Services, LLC (Name of Applicant);

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

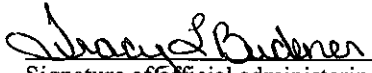
1. The Applicant herein, attests under penalty of false statement that all statements made in the application for certification renewal are true and complete and that it will amend its application while the application is pending if any substantial changes occur regarding the information provided in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

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

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


Signature of Affiant & Title ASST. TREASURER

Sworn and subscribed before me this 9th day of October, 2018
Month Year


Signature of Official administering oath

Tracy L Buckner Notary Public
Print Name and Title

My commission expires on September 22 2019

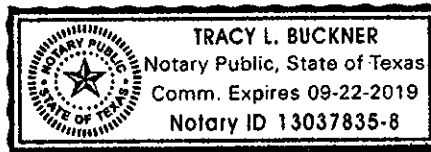


Exhibit A-10

Principal Officers and Directors

The following is a current list of the Officers and Directors of Direct Energy Services, LLC:

Board Positions

Manu Asthana
Director & Co-President

12 Greenway Plaza
Suite 250
Houston, TX 77046
(713) 877-3642

John Schultz
Director & Co-President

One Hess Plaza
Woodbridge, NJ 07095
(732) 750-6197

Officers

Bray Dohrwardt
Co-Secretary

12 Greenway Plaza
Suite 250
Houston, TX 77046
(713) 877-3851

Paolo Berard
Co-Secretary

12 Greenway Plaza
Suite 250
Houston, TX 77046
(713) 877-3533

Erica Steele
Assistant Secretary

1001 Liberty Ave.
Pittsburgh, PA 15222
(412) 667-5151

Randy Kruger
Co-Treasurer

One Hess Plaza
Woodbridge, NJ 07095
(732) 750-6792

Dana Mason
Co-Treasurer

12 Greenway Plaza
Suite 250
Houston, TX 77046
(713) 877-5810

Erin Miles
Assistant Treasurer

12 Greenway Plaza
Suite 250
Houston, TX 77046
(713) 904-7062

Exhibit B-1

Jurisdictions of Operation – Direct Energy Services, LLC

Name: Direct Energy Services, LLC
Business Address: 12 Greenway Plaza, Suite 250, Houston, TX 77046

License #/State of Issuance: Docket # 06-03-06RE02 (Power)/Connecticut;
Case No. EA-05-3-5/Order No. 13816 (Power)/D.C.;
Certificate No. 6790 (Power)/Delaware;
Docket # 05-0722 (Power)/Illinois;
License # CS-047 (Power)/Massachusetts;
License # IR-719 (Power)/Maryland;
Docket # 2005-479 (Power)/Maine;
License # ESL-0078 (Power)/New Jersey;
Letter Order 2017 (Power)/ New York;
License # DM 15-513 (Power)/ New Hampshire;
Certificate # 00-19E(9) (Power)/Ohio;
License # A-110164 (Power)/Pennsylvania;
Docket # D-96-6(U2)(Power)/Rhode Island;

States Not Currently Serving Customers
Case No. U-14724 (Power)/Michigan;
License # E-36 (Power)/Virginia

Direct Energy Business, LLC subsidiaries and affiliates currently serving retail electric customers or engaged in the retail sale of electricity:

Name: Direct Energy Business, LLC
Business Address: 1001 Liberty Avenue Suite 1200, Pittsburgh, PA 15222

License #/State of Issuance: License # 1351 (Power)/California;
Docket # 00-05-14RE01 (Power)/Connecticut;
Certificate # 5267 (Power)/Delaware;
License # EA-04-4-4 (Power)/D.C.;
Docket No. 04-0811 (Power)/Illinois;
Docket No. 2011-201 (Power)/Maine;
License # IR-437 (Power)/Maryland;
License # CS-021 (Power)/Massachusetts;
Docket # U-13609 (Power)/Michigan;
License # ESL-0165 (Power)/New Jersey;
License # DM 15-373 (Power)/New Hampshire;

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Letter Order 2017 (Power & Gas) /New York
Certificate # 00-005(9) (Power)/Ohio;
License # A-110025 (Power)/Pennsylvania;
Docket # D-96-6(Z) (Power)/Rhode Island;
Docket # 2379(A3) (Gas)/Rhode Island;
Certificate # 10011 (Power)/Texas
License # E-38 (Power)/Virginia

State Not Currently Serving Customers

License # IR-2697 (Gas)/Maryland
License #0013 (Gas)/California;
Registration # 12-03 (Gas)/Connecticut;
License # GS-052 (Gas)/Massachusetts;
License # GSL-0145 (Gas)/New Jersey;
License # A-125072 (Gas)/Pennsylvania;

Name:

Business Address:

Direct Energy Business Marketing, LLC

194 Wood Avenue South Suite 200, New Jersey, NJ
08830

Customers

License #/State of Issuance:

Licensed, Not Currently Serving Electric

Docket # 13-08-02 (Power)/Connecticut;
Docket # EA-2013-12 (Power)/D.C.;
Certificate No. 8425 (Power)/Delaware;
Docket # 2013-00404 (Power)/Maine;
License # IR-3123 (Power)/Maryland;
DM 13-260 (Power)/New Hampshire;
License # ESL0142 (Power)/New Jersey;
Letter Order 2017 (Power)/New York;
Certificate # 13-707E(2) (Power)/Ohio;
License A-2013-2368464 (Power)/Pennsylvania;
Docket # D-96-6(J6) (Power)/Rhode Island;

Name:

Business Address:

Direct Energy, LP

12 Greenway Plaza, Suite 250, Houston, TX 77046

License #/State of Issuance:

Rep# 10040 (Power)/Texas

Name:

Business Address:

CPL Retail Energy, LP

12 Greenway Plaza, Suite 250, Houston, TX 77046

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License #/State of Issuance: Rep# 10023 (Power)/Texas

Name: WTU Retail Energy, LP
Business Address: 12 Greenway Plaza, Suite 250, Houston, TX 77046

License #/State of Issuance: Rep# 10022 (Power)/Texas

Name: First Choice Power, LLC
Business Address: 12 Greenway Plaza, Suite 250, Houston, TX 77046

License #/State of Issuance: Rep# 10008 (Power)/Texas

Name: Bounce Energy, Inc.
Business Address: 12 Greenway Plaza, Suite 250, Houston, TX 77046

License #/State of Issuance: License # 10162 (Power)/Texas

Name: Gateway Energy Services Corporation
Business Address: 12 Greenway Plaza, Suite 250, Houston, TX 77046

License #/State of Issuance: License # A-2009-2137275 (Power)/Pennsylvania;
License # IR-340 (Power)/Maryland;
License # ESL-0166(Power)/ New Jersey

Wholesale Permits:

Name: Direct Energy Marketing Inc.
Business Address: 12 Greenway Plaza, Suite 250, Houston, TX 77046

License #/Issue Authority: Permit # EA-280-B (Electric Export)/Department of
Energy
Docket NO. ER11-1850 (FERC MBR) Federal Energy
Regulatory Commission

Exhibit B-2 Experience & Plans

Direct Energy Services, LLC ("DES") is part of the Direct Energy family of companies. Direct Energy is one of North America's largest retail providers of electricity, natural gas and home and business energy-related services, with over 4 million residential and commercial customers. Direct Energy provides customers with choice and support in managing their energy costs through a portfolio of innovative products and services. A subsidiary of Centrica plc (LSE:CNA), one of the world's leading integrated energy companies, Direct Energy operates in 50 states plus the District of Columbia and 8 Canadian Provinces.

DES, formerly known as Energy America, first entered the Duke Energy, Ohio CHOICE program as a marketer in the fourth quarter of 2002. We have since made entry into the other Ohio Utility Districts initiated marketing campaigns in the First Energy utilities (Ohio Edison, Toledo Edison, and Cleveland Electric Illuminating), American Electric Power utilities (Ohio Power and Columbus Southern Power), and Dayton Power and Light. DES will continue efforts for expansion through customer acquisition and retention efforts as part of Direct Energy's business model. Upon enrollment by the customer, DES mails a confirmation letter detailing the terms and conditions of the contract as part of its "Welcome Kit" to new customers. Regarding customer inquiries and complaints:

Normal customer service hours are Monday – Friday, 8 AM – 5PM, Eastern Standard Time. When customer concerns are directed to DES's Customer Care Center, issues are researched to determine all factors influencing the concern. Once the factors involved in the issues are established, contact with the customer is made to reach an amicable resolution by a Customer Relations Representative. If a customer needs additional assistance, DES's Customer Relations Representative will inform the Supervisor of Customer Relations, who will become involved and assist with the customer inquiry. If a public agency is involved in the dispute resolutions process, once an investigation is complete, the agency is notified of the results and, assuming concurrence, the matter is closed. If the customer continues to dispute the investigation results, DES will inform the customer that Commission Staff is available to mediate the complaint.

Exhibit B-3 Disclosure of Liabilities and Investigations

In the interest of full disclosure, certain Direct Energy entities have been the subject of legal and regulatory proceedings in the past two years, which are summarized directly below with more detailed explanations following.

- Direct Energy, LP has been the subject of legal and/or regulatory proceedings in Texas.
- Direct Energy Business, LLC has been the subject of a regulatory proceeding with the California Public Utilities Commission.
- Direct Energy Services, LLC has been the subject of legal and/or regulatory proceedings in Michigan,
- Gateway Energy Services Corporation (formerly known as ECONergy Energy Company, Inc.) had been the subject of legal and/or regulatory proceedings in New Jersey.

Direct Energy, LP

In August 2017, Direct Energy, LP agreed to pay an administrative penalty in the amount of \$70,000 under a settlement with Staff of the Public Utility Commission of Texas to resolve allegations of non-compliance with Public Utility Regulatory Act §§ 17.001(a) and 39.101(b)(6), as well as 16 Texas Administrative Code §§ 25.474, relating to selection of a retail electric provider; 25.475, relating to general retail electric provider requirements; 25.481, related to unauthorized charges, and 25.495, relating to unauthorized change of retail electric provider. Commission Staff investigated a series of informal complaints relating to door-to-door sales vendors from January 1, 2014 through February 1, 2016. These complaints included both those received by the Commission's Customer Protection Division as well as by Direct Energy. Direct ceased door-to-door solicitations in Texas on December 1, 2016. Door-to-door sales re-commenced approximately a year later after some process improvements and continue today.

http://interchange.puc.state.tx.us/WebApp/Interchange/Documents/47362_4_951957.PDF

In 2017, Direct Energy, LP received two separate Notices of Investigation from the Public Utility Commission of Texas related to demand response. The first allegation was due to an administrative error in submission of the baseline data

Exhibit B-3 Disclosure of Liabilities and Investigations

for the demand response customer. The second allegation was due to gaps within a demand response customer's usage data that was supplied by the host utility. These separate investigations were combined by commission staff and both were settled with a warning from the Commission.

Direct Energy Business, LLC: California (Penalty Assessment – Non-Compliance)

In July 2017, Direct Energy Business, LLC ("DEB") was notified by the Energy Division of the California Public Utilities Commission ("CPUC") that there was a deficiency in DEB's monthly compliance Resource Adequacy load forecast filing for September 2017 by 16.99 MW. The CPUC allowed a seven day extension to procure the required resources; however, we were unable to execute a contract for the deficiency with the only counterparty that had available supply in time to meet the CPUC's deadline. This resulted in the CPUC assessing a penalty of \$6.66/kWm, which equaled to \$113,000.

Direct Energy Services, LLC: Michigan

PUC Case U-18121

Date of Resolution: January 12, 2017

On January 12, 2017, the Michigan Public Service Commission ("MPSC") issued an order relating to a settlement with Direct Energy Services, LLC ("DES"). The terms of the settlement agreement is that DES agrees to: (1) pay a fine of \$35,000 to be paid to the State of Michigan within 30 days of the Commission order approving the agreement; (2) continue a moratorium on door-to-door sales that began on November 1, 2016, that shall continue for 90 days following the date of the order approving this agreement; (3) submit new training materials within 45 days of the order approving this agreement with actual training of DES' Michigan agents to be completed within 90 days; (4) present Michigan Agency for Energy (MAE) Staff by March 31, 2017 with technologies that enhance customer identification and consent, and secure enrollment processes; (5) implement the Whitepages process described in Attachment 1 to the settlement agreement; (6) meet monthly with the MAE Staff for a period of 12 months to discuss progress with compliance with this settlement agreement and any other related matter; (7) develop with MAE Staff a template for processing complaints; and (8) reopen this docket should the MAE State Response Division identify any reoccurrence of the unauthorized switching of any customers by DES salesperson, which may result in fines, permanent moratorium on door-to-door sales and telemarketing, and or potential license revocation.

Exhibit B-3 Disclosure of Liabilities and Investigations

Gateway Energy Services Corporation: New Jersey

Recently in 2018, Gateway Energy Services Corporation submitted a self-report compliance issue to the New Jersey Board of Public Utilities regarding variable rate pricing for some of its customers. Resolution of this matter is expected to be finalized in the next few months.



Exhibit C-1

Annual Reports

Direct Energy Services, LLC ("DES") is a fully owned subsidiary of Centrica plc, and as such is fully dependent on the financial statements of our parent company.

Please find included below as "**EXHIBIT C-1**", a URL link to the 2017 Annual Report for Centrica plc and the interim 2018 Interim Results for Centrica plc.

2017 Audited Annual Statement

<https://www.centrica.com/investors/financial-reporting/all-company-reports-results>

2018 Interim Financial Results

<https://www.centrica.com/news/interim-results-period-ended-30-june-2018>

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Exhibit C-2 SEC Filings

Direct Energy Services, LLC is an indirect wholly owned subsidiary of Centrica plc. Centrica plc is headquartered in Windsor, UK. As a foreign entity, Centrica is not subject to SEC jurisdiction, and thus does not have SEC filings.

PUBLIC



Exhibit C-4
Financial Arrangements

Redacted due to Confidential Nature

PUBLIC

Exhibit C-5
Projected Financial Forecast – 2 Years
Direct Energy Business – Ohio Power

Redacted due to confidential nature

PUBLIC



Exhibit C-6 Credit Rating

Direct Energy Services, LLC is a fully owned subsidiary of Centrica plc. As such, Direct Energy Services, LLC relies on the credit rating of our parent company,

As evidenced in Exhibit C-7 "Credit Report", which is also summarized in the table below, Centrica plc maintains a long-term credit rating of Baa1 with Moody's, and an A- with Fitch and is rated as having a "Stable" outlook by both Rating Agency.

Agency Credit Ratings:

Rating Agency	Long Term Rating	Outlook	Short Term Rating
Moody's	Baa1	Stable	P-2
S&P	BBB+	Negative	A-2
Fitch	A-	Stable	F2



Exhibit C-8

Bankruptcy Information

Over the past two years, Direct Energy Services, LLC has not sought financial reorganization, protection from creditors or had any other form of bankruptcy filing. The same is true of the Directors and Officers of Direct Energy Services, LLC that are referenced on Exhibit A-10 and Direct Energy Services, LLC's parent company Centrica plc.

PUBLIC



Exhibit C-9 Merger Information

In March 2018 Direct Energy acquired NJR Retail Services Company, a retail provider of natural gas to large commercial and industrial customers in Pennsylvania, New Jersey, Delaware and Maryland. The company has since been renamed Direct Energy RS Gas Inc.



Exhibit C-10 Corporate Structure

Redacted due to confidential nature

Exhibit D-1 Operations

Direct Energy Services, LLC is part of the Direct Energy family of companies, and as such has operational backing with DE's affiliates to maximize efficiency in providing high quality service to customers. Direct Energy maintains a 24-hour operation for buying and selling in both retail and wholesale markets. Direct Energy Business Marketing, LLC is the wholesale trading affiliate for US Trading and has the contractual relationships with outside parties and partners to provide energy supply for end use customers.

Direct Energy purchases and sells power from the wholesale market on an hourly, daily, weekly and monthly basis. After buying or selling the power, Direct Energy then schedules the energy with the Control Areas. This process entails buying and scheduling transmission and ancillary services and properly creating and submitting NERC tags (via OATI software) to the Control Areas. Our retail and wholesale schedules are confirmed with the Control Areas to ensure flow prior to start and end of the schedule for verification of flow.



Exhibit D-2

Operations Expertise

John Schultz is currently the President, Centrica North America and President of Direct Energy Business. Direct Energy Business has responsibility for the supply and trading of natural gas and electricity for all Centrica North America affiliates. John's office is located in the Iselin, New Jersey. He has 20+ years of experience in the energy industry and has held various positions in the energy industry, including natural gas and electricity trading and operations, commercial and industrial sales and energy infrastructure development. John has a B.S in Agricultural Economics from Penn State University and has attended executive development programs at the Fuqua School of Business at Duke University and Harvard Business School. His team for natural gas is led by David Brast, SVP, North American Power & Gas, and Steve Dixon, Head of North American Sales.

David joined the company in August 2013. He is an experienced energy professional who previously held a role as Senior Vice President of Business Segments for Reliant/NRG Business Solutions. He has in excess of 20 years' experience specializing in risk management, power and gas trading and commercial operations. He has a bachelor's degree in Accounting and Finance from Texas A&M University.

Steve is currently Head of North American Sales for Direct Energy Business. He joined Direct Energy in 2013 as the Head of the East Region Gas Operations and prior to that, he served as Vice President of Natural Gas Operations for Hess Corporation's Energy Marketing business. He joined Hess Corporation in 1998 after serving in positions at Resource Energy, Aquilla Energy and Phillip's Petroleum Company (now Conoco Phillips). He has 30 years of experience in the energy industry in a variety of roles, including operations, sales, marketing and trading. In his current role at Direct Energy, he is responsible for leading all aspects in developing a best in class customer facing sales team. Mr. Dixon has a BS in Business Administration from Lyon College and an MBA from the Walton College at the University of Arkansas. He has also attended Executive Development Programs at both Harvard Business School and Harvard Law School.



Exhibit D-3

Key Technical Personnel

John Schultz, President – Centrica North America & Direct Energy Business
John.schultz@directenergy.com
(732) 750-6197

Mr. Schultz has in excess of 20 years of experience in the energy industry and has held various positions in the field including natural gas and electricity trading and operations, commercial and industrial sales and energy infrastructure development. Mr. Schultz was previously the Senior Vice President of Hess Energy Marketing, LLC and was promoted to President of Direct Energy Business, LLC ("DEB") and is currently the President of Centrica North America as well.

Mr. Schultz is a graduate of Penn State University and has attended executive development programs at both the Fuqua School of Business at Duke University and Harvard Business School.

Steve Dixon, SVP, North American Sales – Direct Energy Business
Steve.dixon@directenergy.com
(732) 750-6240

Steve is currently SVP of North American Sales for Direct Energy Business. In this role, he is responsible for leading all aspects of developing a best in class customer-facing sales team.

Steve joined DEB as Head of the East Region Gas Operations in November 2013, and prior to that he was Vice President of Natural Gas Operations for Hess Corporation's Energy Marketing business. He joined Hess Corporation in 1998, after serving in positions at Resource Energy, Aquila Energy, and Phillips Petroleum Company (now ConocoPhillips). He has 30 years of experience in the energy industry in a variety of roles including operations, sales, marketing, and trading.

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Steve is originally from Houston, TX and has a B.S. in Business Administration from Lyon College and a MBA from the Walton College at the University of Arkansas. He has also attended executive development programs at both Harvard Business School and Harvard Law School.

David Brast, SVP North American Power & Gas – Direct Energy Business
David.brast@directenergy.com
(713) 877-3642

David is the SVP of North American Power & Gas where his responsibility is overseeing retail supply, trading, asset optimization and power generation.

David joined the company in August 2013. He is an experienced energy professional who previously held a role as Senior Vice President of Business Segments for NRG Energy. He has more than 20 of years of experience specializing in risk management, power and gas trading and commercial operations. He has a Bachelor's degree in Accounting and Finance from Texas A&M University.



Exhibit D-4
FERC Power Marketer License

Direct Energy Services, LLC maintains a current FERC Market Based Rate Tariff, which is under docket ER11-1846-000 effective January 1, 2011.