# FILE Integrity nergy The Right Choice

Public Utilities Commission of Ohio Docketing Division 13<sup>th</sup> Floor 180 East Broad Street Columbus Ohio 43215-3793

Subject: Renewal Application for Aggregators/Power Brokers

To Whom it May Concern:

Enclosed you will find Integrity Energy's renewal certification application for aggregators/power brokers. You will find one original along with 3 copies.

If you have any questions or concerns please do not hesitate to contact me directly at 216-502-4410 or <a href="mailto:pnero@integenergy.com">pnero@integenergy.com</a>

Sincerely,

Paul Nero

C.E.O.

**Integrity Energy** 

NECCLIFE CONTRACTOR

This is to certify that the images appearing one at accurate and complete reproduction of a case at technician

Date Processed 122/19



Original AGG Case Number	Version
11 - 486 -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 Integrity Energy, LTD
	Address 5711 Grant Ave Cleveland Ohio 44105
	PUCO Certificate # and Date Certified 11-339E 2/28/2011
	Telephone # (216) 502-4410 Web site address (if any) www.integenergy.com
A-3	List name, address, telephone number and web site address under which Applicant will do business in Ohio
	Legal Name Integrity Energy, LTD
	Address 5711 Grant Ave Cleveland Ohio 44105
	Telephone # (216) 502-4410 Web site address (if any) www.integenergy.com
A-4	List all names under which the applicant does business in North America Integrity Energy
A-5	Contact person for regulatory or emergency matters
	Name Paul Nero
	Title CEO
	Business address 5711 Grant Ave Cleveland Ohio 44105
	Telephone # (216) 502-4410 Fax # (216) 441-4923
	E-mail address <u>pnero@integenergy.com</u>

### Contact person for Commission Staff use in investigating customer complaints A-6 Name Paul Nero Title CEO Business address 5711 Grant Ave Cleveland Ohio 44105 Telephone # (216) 502-4410 Fax # (216) 441-4923 E-mail address pnero@integenergy.com A-7 Applicant's address and toll-free number for customer service and complaints Customer Service address 5711 Grant Ave Cleveland Ohio 44105 Toll-free Telephone #\_(866) 495-9700 Fax # (216) 441-4923 E-mail address pnero@integenergy.com A-8 Applicant's federal employer identification number # 27-2217792 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. <u>APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE</u>

#### 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.

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 <u>Exhibit C-2 "SEC Filings,"</u> 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 <u>Exhibit C-3 "Financial Statements,"</u> 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 <u>Exhibit C-4 "Financial Arrangements,"</u> 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 guaranter 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.

- Exhibit C-5 "Forecasted Financial Statements," provide two years of forecasted C-5 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 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.
- Exhibit C-8 "Bankruptcy Information," provide a list and description of any **C-8** 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 subsidiany companies.

Signature of Applicant & Title

Elizabeth Rayl **Notary Public** In and For the State of Ohio **Recorded in Summit County** My Commission Expires

February 5, 2023

Signature of official administering oath

My commission expires on 02/05/2023

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## *AFFIDAVIT*

State of	Otto	_: !hrctle	22 V		
County of	MODINA	   <u>fhretle</u> :	<u>n)</u> 33.		
PAUL	NELO	, Affiant, being duly sworn/a	affirmed according	to law, depose	s and says that:
	he CEO				(Name of Applicant);

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

- 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.

My commission expires on 02 05 2023

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.

Paul Nero Integrity Energy C.E.O. 5711 Grant Ave Cleveland Ohio 44105 216-502-4410 pnero@integenergy.com

Mike Naughton Integrity Energy President 5711 Grant Ave Cleveland Ohio 44105 216-502-4409 Mnaughton@integenergy.com 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 service including aggregation services.

Integrity Energy is licensed and provides energy consulting services in the following states:

Connecticut (license # 10-04-18)

Massachusetts (license # EB-164)

Maine (license # 2010-315)

Rhode Island (License # D-96-6)

Pennsylvania (license # A-2010-2175245)

Illinois (license # 10-0425)

Maryland (license # IR-1985)

Ohio (license # 11-339E)

**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 the Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

Integrity Energy is currently working with multiple suppliers in many different jurisdictions. Integrity Energy does not take title to the power and solely provides consulting, brokering, and energy planning services. Integrity works with 14 - 16 different suppliers to contract power for a specific customer. We have successfully enrolled over 4,000 commercial and Industrial accounts with competitive energy suppliers.

The contracts that are signed by the customer are from the supplier directly and not Integrity. All contracted services and billing statements come directly from the specific supplier that the customer chooses. Customer inquiries, questions, concerns, or complaints will be handled from our office or the supplier depending on which route the customer takes. All contact information is provided to every customer after the completion of a contract signed.

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

Integrity Energy does not have any judgments, liabilities, or rulings that are pending nor have there been any in the past.

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.

Integrity Energy does not provide Annual Reports. Integrity Energy is a privately held company.

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 parents company. 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.

Integrity Energy is not required to file with the SEC.

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.

Integrity Energy is owner managed. The financial statements are not audited, but are reviewed by our outside accountants. The owners Paul Nero and Mike Naughton certify that the following 3 pages that detail our financial statements are accurate.

## Integrity Energy

Profit & Loss
January through December 2017 and 2018

115,642.00	154,659.62
27,659.00	127,653.21
297,567.00	289,653.85
38,912.00	115,853.02
259,871.00	191,582.65
19,524.00	42,865.62
49,588.00	97,323.66
28,548.00	33,653,76
79,931.00	86,853.22
85,649.00	156,457.27
3,659,00	177,233.17
112,391.00	78,659.12
68,285.00	137,498.53
98,563.00	248,653.69
1,283,785.00	1,938,180.49
1.632.79	865.21
•	
	74,589.62
• • • • • • • • • • • • • • • • • • • •	
	210.00
	16,896,47
	10,000.
1,800.00	1,478.00
112.00	95.00
18,009.75	4,219.75
1,159.35	1,365.24
596.86	858.97
4,312.58	76,857.42
0.00	-
0.00	-
762,310,69	1,025,659.36
0.00	0.00
766,623.25	1,102,318.78
0.00	0
838,664.57	1,202,893.04
•	
447,120.43	735,287.45
79.56	117.54
0.00	. 0
79.58	117,54
79.58	117.54
447,199.99	735,404.99
	27,659.00 297,567.00 38,912.00 259,871.00 19,524.00 49,588.00 28,548.00 79,931.00 85,649.00 3,559.00 112,391.00 68,285.00 98,563.00 1,283,785.00 1,832.79 0,00 1,632.79 0,00 140.00 26,933.57 1,800.00 112.00 18,009.75 1,159.35 596.86 4,312.58 0,00 766,623.25 0,00 836,664.57 447,120.43

## Integrity Energy Balance Sheet

As of December 31, 2017 and December 31, 2018

	Dec 31, 17	Dec 31, 18
ASSETS		
Current Assets		
Checking/Savings		
1020 - Charter One Checking	128,189.23	163,594.22
1021 - Charter One Money Mkt	0.00	0.00
Total Checking/Savings	128,189.23	163,594.22
Total Current Assets	128,189.23	163,594.22
TOTAL ASSETS	128,189.23	163,594,22
LIABILITIES & EQUITY		
Liabilities		
Current Liabilities		
Other Current Liabilities		
Start Up Capital	0.00	0.00
Total Other Current Liabilities	0.00	0.00
Total Current Liabilities	0.00	0.00
Total Liabilities	0.00	0.00
Equity		
Retained Earnings	30,989.24	128,189.23
Owner Distributions	-350,000.00	-700,000.00
Net Income	447,199.99	735,404.99
Total Equity	128,189.23	163,594.22
TOTAL LIABILITIES & EQUITY	128,189.23	163,594.22

## Integrity Energy Statement of Cash Flows

January through December 2017 and 2018

	Jan - Dec 17	Jan - Dec 18
Cash at start of period	30,989.24	128,189.23
OPERATING ACTIVITIES		
Net Income	447,199.99	735,404.99
Adjustments to reconcile Net Income		
to net cash provided by operations:		
Start Up Capital	0.00	0.00
Net cash provided by Operating Activities	447,199.99	735,404.99
FINANCING ACTIVITIES		
Capital Contributions	0.00	0.00
Owner Distribution/Withdrawals	-350,000.00	-700,000.00
Net Cash provided by Financing Activities	-350,000.00	-700,000.00
Net cash increase for period	97,199.99	35,404.99
Cash at end of period	128,189.23	163,594.22

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.,).

Integrity Energy's application is for a Broker/aggregator and will not be conducting business as a CRES. Integrity Energy does not possess any debt and does not require any outside loans to operate.

### **C-5 Forecasted Financial Statement**

## Integrity Energy Forecasted Financial Statement

## January - December 2019

Total Income	\$ 2,750,000.00
Total Expenses	\$ 1,500,000.00
Net Income	\$ 1,250,000.00

## January - December 2020

Total Income	\$ 3,500,000.00
Total Expenses	\$ 2,000,000.00
Net Income	\$ 1,500,000.00

Exhibit C-6 "Credit Rating," provide a statement disclosing the applicant's credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody's Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or 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.

Integrity Energy is a start-up company therefore no credit rating exists from any of the above agencies.

Exhibit C-7 "Credit Report," provide a copy of the applicant's credit report from Experion, Dun and Bradstreet or a similar organization.

Integrity Energy is a fairly new company therefore no credit report is available from any of the above agencies.

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.

Integrity Energy has not been through any type of reorganization nor has it ever filed for bankruptcy protection.

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

Integrity Energy has not gone through any type of dissolution, merger, or acquisition.

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 and companies that aggregate customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and the applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.

Integrity Energy is an Ohio corporation that does not have any affiliations or subsidiary companies that supply retail or wholesale electricity or natural gas to customers that aggregate customers in North America.