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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Interstate ) Case No: 11-5326-EL-CRS  
Gas Supply, Inc. for Certification as a )  
Retail Electric Supplier )

MOTION FOR PROTECTIVE ORDER, MOTION TO EXTEND PROTECTIVE ORDER,  
AND MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY, INC.

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**Attorney for IGS Energy**

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**MOTION FOR PROTECTIVE ORDER AND MOTION TO EXTEND PROTECTIVE  
ORDER**

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Pursuant to Ohio Administrative Code ("OAC") 4901-1-24(D), Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") respectfully moves the Public Utilities Commission of Ohio ("Commission") for an order protecting from disclosure certain confidential, proprietary and trade secret documents filed concurrently with this motion in the above-captioned docket. The documents for which protective treatment is sought are Exhibits C-3 Financial Statements, C-4 Financial Arrangements, and C-5 Forecasted Financial Statements (collectively "Confidential Documents") contained in IGS's 2019 Renewal Certification Application for a Certified Retail Electric Supplier ("Renewal Application"), filed simultaneously with this motion. The information in the Confidential Documents is competitively sensitive and proprietary business and financial information comprising of trade secrets and granting protective treatment to these documents is not inconsistent with the purposes of Title 49 of the Revised Code. In accordance with OAC 4901-1-24(D), the Confidential Documents have been clearly marked as confidential, and are filed under seal, separate from the remainder of the materials that comprise IGS's Renewal Application.

IGS respectfully moves the Commission for an order extending protective treatment of certain confidential, proprietary and trade secret documents filed in the above-captioned docket related to its 2011, 2013, 2015 and 2017 Renewal Applications. The documents for which an extension of protective treatment is sought are Confidential Documents (described above as Exhibits C-3, C-4, and C-5) filed with IGS's 2011, 2013, 2015 and 2017 Renewal Applications.

The information in the Confidential Documents is competitively sensitive and proprietary business and financial information comprising of trade secrets. Granting protective treatment to these documents is not inconsistent with the purposes of Title 49 of the Revised Code. In accordance with Rule 4901-1-24(D), OAC, the Confidential Documents were clearly marked as confidential, and filed under seal, separate from the remainder of the materials that comprise IGS's 2011, 2013, 2015, and 2017 Renewal Applications.

The grounds for this motion are set forth in the memorandum in support. Notably, the Commission has previously granted protective treatment to similar information in connection with IGS' previous requests to renew its certification and extended protective treatment of such information.<sup>1</sup>

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<sup>1</sup> See *In the Matter of the Application of Interstate Gas Supply, Inc. for Certification as a Retail Natural Gas Supplier*, Case No. 02-1683-GA-CRS, Entry granting protective treatment (Aug. 11, 2004); Entry granting protective treatment (July 14, 2006); Entry granting protective treatment (June 13, 2007); Entry granting protective treatment (July 28, 2008); Entry granting protective treatment (October 1, 2009); Entry granting and extending protective treatment (Dec. 15, 2010); Entry granting protective treatment (September 6, 2012).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Nugent", is written over a horizontal line.

Michael Nugent (0090408)

Senior Counsel

Email: Michael.Nugent@igs.com

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

Telephone: (614) 659-5065

Facsimile: (614) 659-5073

***Attorney for IGS Energy***

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Interstate     )     Case No: 11-5326-EL-CRS  
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**MEMORANDUM IN SUPPORT**

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The Commission's rules allow for protective treatment of certain confidential information filed at the Commission in order to prevent disclosure of such information.

OAC 4901-1-24(D) states in part:

Upon motion of any party or person with regard to the filing of a document with the commission's docketing division relative to a case before the commission, the commission, the legal director, the deputy legal director, or an attorney examiner may issue any order which is necessary to protect the confidentiality of information contained in the document, to the extent that state or federal law prohibits release of the information, including where the information is deemed by the commission, the legal director, the deputy legal director, or the attorney examiner to constitute a trade secret under Ohio law, and where nondisclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code. Any order issued under this paragraph shall minimize the amount of information protected from public disclosure.

Ohio law recognizes the need to provide protective treatment to information such as the Confidential Documents. Ohio Revised Code ("R.C.") 4929.23(A) specifically permits the Commission to grant protective treatment to confidential information provided by a certificated retail electric supplier. Further, under R.C. 1333.61(D), "Trade secret" means:

[I]nformation, including the whole or any portion or phase of any scientific or technical information, design, process, procedure, formula, pattern, compilation, program, device, method, technique, or improvement, or any business information or plans, financial information, or listing of names, addresses, or telephone numbers, that satisfies both of the following:

- (1) It derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.
- (2) It is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

The Confidential Documents consist of financial statements, financial arrangements, and forecasted financial statements that are proprietary, confidential and that constitute trade secrets. Public disclosure of this information would jeopardize IGS's business position in negotiations with other parties and its ability to compete. By examining the Confidential Documents, competitors could reasonably estimate IGS's growth rates, market share and margins. Competitors could use the Confidential Documents to make strategic decisions whether to enter or exit the markets in the geographic regions in which IGS operates. Therefore, the Confidential Documents derive independent economic value from not being generally known to, and not being readily ascertainable by proper means by other persons. Public disclosure of the Confidential Documents will cause substantial harm to IGS's business and competitive interests.

Moreover, the Confidential Documents that were previously granted protective treatment remain competitively sensitive and proprietary. IGS's business model, including margins and pricing, has not changed significantly since 2011. In addition, by comparing IGS's financial results from year to year, competitors could determine the areas in which IGS's business is expanding and contracting. Accordingly, the Confidential Documents derive independent economic value from not being generally known to, and not being readily ascertainable by proper means by other persons.

The information contained in the Confidential Documents described in this motion is not generally known by the public and is held in confidence in the normal course of business. The Confidential Documents sought to be protected are disclosed to only a few key personnel at IGS. Also, IGS only makes the Confidential Documents available to parties outside of IGS for business purposes and under the protection of a confidentiality agreement.

Finally, IGS and its affiliated companies are privately held, and therefore, would be especially vulnerable if protective treatment were not granted.<sup>2</sup> Indeed, the Commission has previously found the need for protective treatment to be especially "persuasive for the privately held companies."<sup>3</sup> Thus, unlike a publicly held company—with thousands of dispersed and anonymous shareholders—the financial information of IGS has the potential to disclose personal financial data of individuals and not just company data. As a matter of public policy, financial data of individuals should receive heightened protection.

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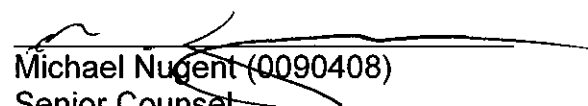
<sup>2</sup> *In the Matter of the Application of Stand Energy Corporation for Certification as a competitive retail natural Gas Supplier*, Entry on Rehearing at 5-6 (Jun. 14, 2017) (providing protective treatment for a ten-year period).

<sup>3</sup> See *In the Matter of the Applications of the Following Entities for a Certificate to Provide Competitive Retail Natural Gas Service in Ohio: NICOR Energy L.L.C, Vectren Retail LLC, d.b.a. Vectren Source, Shell Energy Services Co. L.L.C, Volunteer Energy Services Inc., ACN Energy Inc., Energy America LLC, FirstEnergy Solutions Corp., AEP Ohio Retail Energy LLC, Energy Cooperative of Ohio, MidAmerican Energy Company, ProLiance Energy LLC, Metromedia Energy Inc., and UGI Energy Services Inc., d.b.a. GASMARK*, Case Nos. 02-1654-GACRS, 02-1668-GA-CRS, 02-1680-GA-CRS, 02-1786-GA-CRS, 02-1828-GA-CRS, 02-1829-GA-CRS, 02-1864- GA-CRS, 02-1889-GA-CRS, 02-1891-GA-CRS, 02-1893-GA-CRS, 02-1909-GA-CRS, 02-1926-GA-CRS, 02- 1968-GA-CRS, Entry, (June 14, 2003); See *Id.*, at para. 3, p. 2. See also *In the Matter of the Applications of Vectren Retail, LLC, d/b/a Vectren Source, Interstate Gas Supply, Inc., Shell Energy Services Co., L.L.C, and FirstEnergy Solutions Corp. for Certification as Retail Natural Gas Suppliers in the State of Ohio; In the Matter of the Application of Direct Energy Services, LLC for Renewal of Certification as a Competitive Retail Natural Gas Supplier and for Approval to Transfer that Certification*, Case Nos. 02-1668-GA-CRS, 02-1683-GA-CRS, 02-1680-GA-CRS, 02-1864-GA-CRS, 02-1829-GA-CRS, Entry (Aug. 11, 2004).

Lastly, granting confidential treatment to the information will not impair the purposes of Ohio Revised Code Title 49, because the documents filed under seal will allow the Commission and Staff to have full access to the information. IGS is also filing a public version of its 2019 Renewal Application that contains a great deal of public, non-proprietary information about IGS. And, IGS has previously filed public versions of its 2011, 2013, 2015, and 2017 Renewal Applications that contain a great deal of public, non-proprietary information about IGS.

The reasons set forth above demonstrate that the information contained in the Confidential Documents has actual, substantial independent economic value from not being generally known, and not being ascertainable by proper means by persons who would derive economic value from disclosure. Public disclosure of the Confidential Documents will cause substantial harm to IGS's business and competitive interests. Thus, IGS respectfully urges the Commission to grant an order to protect the confidentiality of the Confidential Documents filed herein under seal, and to extend the order of protection related to the Confidential Documents filed as part of IGS's 2011, 2013, 2015 and 2017 Renewal Applications.

Respectfully submitted,



Michael Nugent (0090408)  
Senior Counsel  
Email: Michael.Nugent@igs.com  
IGS Energy  
6100 Emerald Parkway  
Dublin, Ohio 43016  
Telephone: (614) 659-5065  
Facsimile: (614) 659-5073

***Attorney for IGS Energy***





# Public Utilities Commission

Original CRS Case Number	Version
181 - 5326-EL-CRS	May 2016

## RENEWAL APPLICATION FOR RETAIL GENERATION PROVIDERS AND POWER MARKETERS

Please print or type all required information. Identify all attachments with an exhibit label and title (Example: Exhibit C-10 Corporate Structure). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division; 180 East Broad Street, Columbus, Ohio 43215-3793.

**This PDF form is designed so that you may input information directly onto the form.  
You may also download the form, by saving it to your local disk, for later use.**

### A. RENEWAL INFORMATION

#### A-1 Applicant intends to be renewed as: (check all that apply)

- |  |                                       |
|--|---------------------------------------|
| <input checked="" type="checkbox"/> Retail Generation Provider | <input type="checkbox"/> Power Broker |
| <input checked="" type="checkbox"/> Power Marketer             | <input type="checkbox"/> Aggregator   |

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

Legal Name Interstate Gas Supply, Inc.  
Address 6100 Emerald Parkway  
PUCO Certificate # and Date Certified 11-403E(4) 10-30-2017  
Telephone # (614) 659-6500 Web site address (if any) www.igs.com

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

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

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

Interstate Gas Supply Inc.  
IGS Energy

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

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

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

Name Tara McGraw  
Title Compliance Manager  
Business address 6100 Emerald Parkway, Dublin OH 43016  
Telephone # (614) 659-5058 Fax # (855) 726-3542  
E-mail address Tara.McGraw@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 # (800) 280-4474 Fax # (614) 659-5005  
E-mail address customersupport@igs.com

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

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

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

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

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

## **B. MANAGERIAL CAPABILITY AND EXPERIENCE**

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- B-1** Exhibit B-1 "Jurisdictions of Operation," provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail or wholesale electric services.
- B-2** Exhibit B-2 "Experience & Plans," provide a description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4928.10 of the Revised Code.
- B-3** Exhibit B-3 "Disclosure of Liabilities and Investigations," provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational status or ability to provide the services it is seeking to be certified to provide.
- B-4** Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.  
☒ No      ☐ Yes

If yes, provide a separate attachment labeled as Exhibit B-4 "Disclosure of Consumer Protection Violations" detailing such violation(s) and providing all relevant documents.

- B-5** Disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail or wholesale electric service denied, curtailed, suspended, revoked, or cancelled within the past two years.  
☒ No      ☐ Yes

If yes, provide a separate attachment labeled as Exhibit B-5 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation" detailing such action(s) and providing all relevant documents.

## **C. FINANCIAL CAPABILITY AND EXPERIENCE**

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

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

- C-2** **Exhibit C-2 “SEC Filings,”** provide the most recent 10-K/8-K Filings with the SEC. If the applicant does not have such filings, it may submit those of its parent company. An applicant may submit a current link to the filings or provide them in paper form. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that the applicant is not required to file with the SEC and why.
- C-3** **Exhibit C-3 “Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer certified financial statements covering the life of the business. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns (with social security numbers and account numbers redacted).
- C-4** **Exhibit C-4 “Financial Arrangements,”** provide copies of the applicant's financial arrangements to conduct CRES as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.,).

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

First time applicants or applicants whose certificate has expired as well as renewal applicants can meet the requirement by one of the following methods:

1. The applicant itself stating that it is investment grade rated by Moody’s, Standard & Poor’s or Fitch and provide evidence of rating from the rating agencies.
2. Have a parent company or third party that is investment grade rated by Moody’s, Standard & Poor’s or Fitch guarantee the financial obligations of the applicant to the LDU(s).
3. Have a parent company or third party that is not investment grade rated by Moody’s, Standard & Poor’s or Fitch but has substantial financial wherewithal in the opinion of the Staff reviewer to guarantee the financial obligations of the applicant to the LDU(s). The guarantor company’s financials must be included in the application if the applicant is relying on this option.
4. Posting a Letter of Credit with the LDU(s) as the beneficiary.

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

- C-5 **Exhibit C-5 “Forecasted Financial Statements,”** provide two years of forecasted income statements for the applicant’s **ELECTRIC related business activities in the state of Ohio Only**, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer. The forecasts should be in an annualized format for the two years succeeding the Application year.
- C-6 **Exhibit C-6 “Credit Rating,”** provide a statement disclosing the applicant’s credit rating as reported by two of the following organizations: Duff & Phelps, Fitch IBCA, Moody’s Investors Service, Standard & Poor’s, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or an affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant’s parent or affiliate organization that guarantees the obligations of the applicant. If an applicant or its parent does not have such a credit rating, enter “N/A” in Exhibit C-6.
- C-7 **Exhibit C-7 “Credit Report,”** provide a copy of the applicant’s credit report from Experian, Dun and Bradstreet or a similar organization. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter “N/A” for Exhibit C-7.
- C-8 **Exhibit C-8 “Bankruptcy Information,”** provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.
- C-9 **Exhibit C-9 “Merger Information,”** provide a statement describing any dissolution or merger or acquisition of the applicant within the two most recent years preceding the application.
- C-10 **Exhibit C-10 “Corporate Structure,”** provide a description of the applicant’s corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.

## D. TECHNICAL CAPABILITY

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

- D-1** **Exhibit D-1 “Operations”** provide a written description of the operational nature of the applicant’s business. Please include whether the applicant’s operations include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.
- D-2** **Exhibit D-2 “Operations Expertise,”** given the operational nature of the applicant’s business, provide evidence of the applicant’s experience and technical expertise in performing such operations.
- D-3** **Exhibit D-3 “Key Technical Personnel,”** provide the names, titles, e-mail addresses, telephone numbers, and the background of key personnel involved in the operational aspects of the applicant’s business.
- D-4** **Exhibit D-4 “FERC Power Marketer License Number,”** provide a statement disclosing the applicant’s FERC Power Marketer License number. (Power Marketers only)

M. CPO  
Signature of Applicant and Title

Sworn and subscribed before me this 18<sup>th</sup> day of September 2019  
Month \_\_\_\_\_ Year \_\_\_\_\_

Signature of official administering oath

Ellen Lynn Teng, Notary  
Print Name and Title

My commission expires on June 2, 2024



# **AFFIDAVIT**

State of Ohio :

Dublin ss.  
(Town)

County of Franklin:

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

He/She is the CFO (Office of Affiant) of Interstate Gas Supply Inc. (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.

Mr. CPO  
Signature of Affiant & Title

Sworn and subscribed before me this 12th day of September, 2019  
Month Year

Ellen Lynn Teng  
Signature of official administering oath

Ellen Lynn Teng, Notary  
Print Name and Title

My commission expires on June 2, 2024





**PUBLIC VERSION**

**TRADE SECRETS, CONFIDENTIAL AND PROPRIETARY INFORMATION**

**CERTIFICATION FOR COMPETITIVE RETAIL ELECTRIC SUPPLIER**

**Exhibits**

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

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

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

**A-11 Exhibit A-11 “Corporate Structure,”** provide a description of the applicant’s corporate structure, including a graphical description of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale natural gas or electricity to customers in North America.

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

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

**B-1 Exhibit B-1 “Jurisdiction of Operation,”** provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered or otherwise authorized to provide retail or wholesale electric services.

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

**B-2 Exhibit B-2 “Experience and Plans,”** provide a current description of the applicant’s experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with the Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

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

**B-3 Exhibit B-5 “Disclosure of Liabilities and Investigations:** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact the applicant’s financial or operational status or ability to provide the services it is seeking to be certified to provide.

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

**B-4** Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.

☒ 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.

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

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

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

**C-2 Exhibit C-2 “SEC Filings,”** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 whether the applicant is not required to file with the SEC and why.

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

**C-3 Exhibit C-3 “Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements, (balance sheet, income statement and cash flow statement). If audited financial statements are not available, provide officer-certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall filed audited or officer-certified financial statements covering the life of the business.

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

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

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

**C-5 Exhibit C-5 “Forecasted Financial Statements,”** provide two years of forecasted financial statements (balance sheet, income statement and cash flow statement) for the applicant’s CRES operation, along with a list of assumptions, and the name, address, email address and telephone number of the preparer.

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

**C-6 Exhibit C-6 “Credit Rating,”** provide a statement disclosing the applicant’s current credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody’s Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliated organization, provided the applicant submits a statement signed by the principal officer of the applicant’s parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant’s parent or affiliate organization that guarantees the obligations of the applicant.

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

**C-7 Exhibit C-7 “Credit Report,”** provide a copy of the applicant’s current credit report from Experion, Dun and Bradstreet, or a similar organization.

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

**C-8 Exhibit C-8 “Bankruptcy Information,”** provide a list and description of any reorganizations, protection from creditors, or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.

**Response:** None.

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

**Response:** none

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

**D-1 Exhibit D-1 “Operations”** provide a written description of the operational nature of the applicant’s business. Please include whether the applicant’s operations will include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.

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

**D-2 Exhibit D-2 “Operations Expertise,”** given the operational nature of the applicant’s business, provide evidence of the applicant’s experience and technical expertise in performing such operations.

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

**D-3 Exhibit D-3 “Key Technical Personnel,”** provide the names, titles, e-mail addresses, telephone numbers, and the background of key personnel involved in the operational aspects of the applicant’s business.

**Response**

**Amy Gilmore – Chief Financial Officer**

Amy leads the IGS teams that are responsible for accounting, financial planning & analysis, treasury & risk, billing, tax, and payroll. She and her teams provide strategic financial support to the company’s internal and external stakeholders.

Prior to joining IGS as Controller in 2013, Amy served as a senior manager at EY, where she spent 12 years in the assurance practice in the firm’s Columbus and Chicago offices. Amy is a certified public accountant and holds a bachelor’s degree in accounting from Miami University and a master’s degree in accounting from The Ohio State University. Contact info: [Amy.Gilmore@igs.com](mailto:Amy.Gilmore@igs.com) 614-659-5368

**Matt S. White, Esq - Chief Legal & Regulatory Officer**

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

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

**Dan Dishno – Chief Supply and Risk Officer**

Dan leads the Supply and Risk teams for the organization. These teams focus on commodity pricing/risk, scheduling, forecasting and Utility Operations. Overall, the team manages approximately 130 BCF of gas flow and 11 TWh of power across our markets. This consists of managing assets across 21 pipelines and approximately 26 BCF of gas storage. Dan has twenty-two years of energy related experience and has been with IGS since 2010.

Prior to joining IGS, Dan spent 13 years with NiSource in various energy related capacities. He holds a Bachelor’s degree in business from Ball State University as well as an MBA from Indiana University.

Contact Info: [Dan.Dishno@igs.com](mailto:Dan.Dishno@igs.com), 614-659-5252

**Andy Dosch – Vice President, Finance**

Andy joined IGS in 2010, when IGS Energy acquired Accent Energy. At Accent, Andy served for five years as CFO, responsible for accounting, finance, HR, and IT functions. Upon joining IGS, he was named Director of Finance, with primary responsibilities on the commodity side of the business, including accounting/finance, treasury & risk, and financial planning & analysis. Andy was named Vice President of Finance in 2018 and is now responsible for day-to-day financial management of IGS Solar and IGS CNG Services. He oversees accounting/finance, financial planning & analysis, deal modeling, external finance partner relationships, and credit/risk management. Prior to his energy experience, Andy served in the assurance practice at KPMG for nearly 11 years. He later served in Controller and CFO capacities before joining Accent.

Andy is a certified public accountant, a member of the Ohio Society of CPAs and the AICPA, and holds a bachelor’s degree with double majors in Accounting and Business from Muskingum University.

Contact Info: [Andy.Dosch@igs.com](mailto:Andy.Dosch@igs.com), 614-659-5145

**D-4 Exhibit D-4 “FERC Power Marketer License Number,”** provide a statement disclosing the applicant’s FERC Power Marketer License number. (Power Marketers only)

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

**PUBLIC VERSION**

**TRADE SECRETS, CONFIDENTIAL AND PROPRIETARY INFORMATION**

**CERTIFICATION FOR COMPETITIVE RETAIL ELECTRIC SUPPLIER**

**Exhibits**

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

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

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

**A-11 Exhibit A-11 “Corporate Structure,”** provide a description of the applicant’s corporate structure, including a graphical description of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale natural gas or electricity to customers in North America.

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

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

**B-1 Exhibit B-1 “Jurisdiction of Operation,”** provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered or otherwise authorized to provide retail or wholesale electric services.

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

**B-2 Exhibit B-2 “Experience and Plans,”** provide a current description of the applicant’s experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with the Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

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

**B-3 Exhibit B-5 “Disclosure of Liabilities and Investigations:** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact the applicant’s financial or operational status or ability to provide the services it is seeking to be certified to provide.

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

**B-4** Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.

☒ 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.

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

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

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

**C-2 Exhibit C-2 “SEC Filings,”** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 whether the applicant is not required to file with the SEC and why.

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

**C-3 Exhibit C-3 “Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements, (balance sheet, income statement and cash flow statement). If audited financial statements are not available, provide officer-certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall filed audited or officer-certified financial statements covering the life of the business.

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

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

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

**C-5 Exhibit C-5 “Forecasted Financial Statements,”** provide two years of forecasted financial statements (balance sheet, income statement and cash flow statement) for the applicant’s CRES operation, along with a list of assumptions, and the name, address, email address and telephone number of the preparer.

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

**C-6 Exhibit C-6 “Credit Rating,”** provide a statement disclosing the applicant’s current credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody’s Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliated organization, provided the applicant submits a statement signed by the principal officer of the applicant’s parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant’s parent or affiliate organization that guarantees the obligations of the applicant.

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



**C-7 Exhibit C-7 “Credit Report,”** provide a copy of the applicant’s current credit report from Experian, Dun and Bradstreet, or a similar organization.

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

**C-8 Exhibit C-8 “Bankruptcy Information,”** provide a list and description of any reorganizations, protection from creditors, or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.

**Response:** None.

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

**Response:** none

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

**D-1 Exhibit D-1 “Operations”** provide a written description of the operational nature of the applicant’s business. Please include whether the applicant’s operations will include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.

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

**D-2 Exhibit D-2 “Operations Expertise,”** given the operational nature of the applicant’s business, provide evidence of the applicant’s experience and technical expertise in performing such operations.

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

**D-3 Exhibit D-3 “Key Technical Personnel,”** provide the names, titles, e-mail addresses, telephone numbers, and the background of key personnel involved in the operational aspects of the applicant’s business.

**Response**

**Amy Gilmore – Chief Financial Officer**

Amy leads the IGS teams that are responsible for accounting, financial planning & analysis, treasury & risk, billing, tax, and payroll. She and her teams provide strategic financial support to the company’s internal and external stakeholders.

Prior to joining IGS as Controller in 2013, Amy served as a senior manager at EY, where she spent 12 years in the assurance practice in the firm’s Columbus and Chicago offices. Amy is a certified public accountant and holds a bachelor’s degree in accounting from Miami University and a master’s degree in accounting from The Ohio State University. Contact info: [Amy.Gilmore@igs.com](mailto:Amy.Gilmore@igs.com) 614-659-5368

**Matt S. White, Esq - Chief Legal & Regulatory Officer**

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

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

**Dan Dishno – Chief Supply and Risk Officer**

Dan leads the Supply and Risk teams for the organization. These teams focus on commodity pricing/risk, scheduling, forecasting and Utility Operations. Overall, the team manages approximately 130 BCF of gas flow and 11 TWh of power across our markets. This consists of managing assets across 21 pipelines and approximately 26 BCF of gas storage. Dan has twenty-two years of energy related experience and has been with IGS since 2010.

Prior to joining IGS, Dan spent 13 years with NiSource in various energy related capacities. He holds a Bachelor’s degree in business from Ball State University as well as an MBA from Indiana University.

Contact Info: [Dan.Dishno@igs.com](mailto:Dan.Dishno@igs.com), 614-659-5252

**Andy Dosch – Vice President, Finance**

Andy joined IGS in 2010, when IGS Energy acquired Accent Energy. At Accent, Andy served for five years as CFO, responsible for accounting, finance, HR, and IT functions. Upon joining IGS, he was named Director of Finance, with primary responsibilities on the commodity side of the business, including accounting/finance, treasury & risk, and financial planning & analysis. Andy was named Vice President of Finance in 2018 and is now responsible for day-to-day financial management of IGS Solar and IGS CNG Services. He oversees accounting/finance, financial planning & analysis, deal modeling, external finance partner relationships, and credit/risk management. Prior to his energy experience, Andy served in the assurance practice at KPMG for nearly 11 years. He later served in Controller and CFO capacities before joining Accent.

Andy is a certified public accountant, a member of the Ohio Society of CPAs and the AICPA, and holds a bachelor’s degree with double majors in Accounting and Business from Muskingum University.

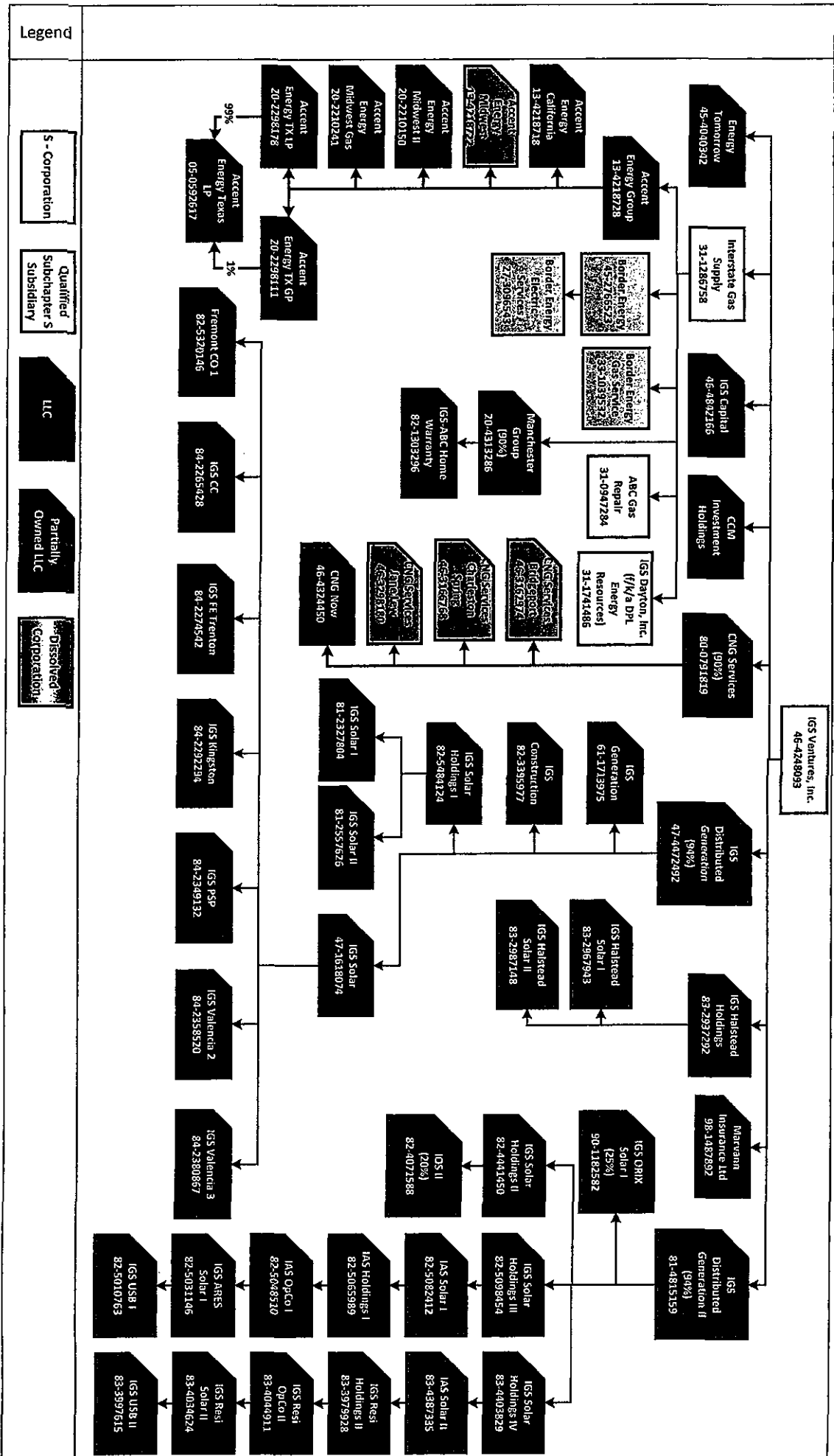
Contact Info: [Andy.Dosch@igs.com](mailto:Andy.Dosch@igs.com), 614-659-5145

**D-4 Exhibit D-4 “FERC Power Marketer License Number,”** provide a statement disclosing the applicant’s FERC Power Marketer License number. (Power Marketers only)

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

## Exhibit A-11 Corporate Structure

## IGS Ventures Legal Entity Hierarchy



## Exhibit C-3 Financial Statements

PRIVILEGED AND CONFIDENTIAL

## Exhibit C-4 Financial Arrangements

PRIVILEGED AND CONFIDENTIAL

## Exhibit C-5 Forecasted Financial Statements

PRIVILEGED AND CONFIDENTIAL

## Exhibit C-7 Credit Report



### 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.

### SNAPSHOT

Currency: Shown in USD unless otherwise indicated 

### IGS Energy, Inc.

Trade Names: INTERSTATE GAS SUPPLY,IGS ENERGY

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

**ACTIVE** **HEADQUARTERS**

D-U-N-S 62-605-8655

Number:

Company: IGS Energy, Inc.

### D&B Address

Address: 6100 EMERALD PARKWAY  
DUBLIN, OH, US - 43016

Location HEADQUARTERS

Type:

Phone: 614-659-5000

Fax:

Web: [www.igsenergy.com](http://www.igsenergy.com)

Report Snapshot Date: 09/13/2018

Endorsement: jstephens@igsenergy.com

Last View Date: 08/21/2019

### Company Summary

#### SCORE BAR

D&amp;B Rating

1R3

1R indicates 10 or more Employees,  
Credit appraisal of 3 is fair

PAYDEX®



78

Paying 3 days past due

Commercial Credit Score Class



2

Low to Moderate Risk of severe  
payment delinquency

Financial Stress Score Class



3

Moderate Risk of severe financial stress

Commercial Credit Score



537

Low to Moderate Risk of severe  
payment delinquency.

---

**D&B 3-MONTH PAYDEX®**

D&B 3-month PAYDEX® : 76 ☉

Low Risk (100) ; High Risk (1)

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

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**D&B PAYDEX®**

D&B PAYDEX® : 78 ☉

Low Risk (100) ; High Risk (1)

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

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**D&B COMPANY OVERVIEW**

**This is a headquarters location**

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

**Branch(es) or Division(s) exist**

Y

**Chief Executive**

SCOTT WHITE, PRES-CEO

**Age (Year Started)**

30 years (1989)

**Mailing Address**

PO BOX 9060

**Employees**

190 (UNDETERMINED Here)

**History Status**

CLEAR

Dublin ,OH

43017

**Financing**

SECURED

**Revenue**

1400000000

**SIC**

1311

**Line of business**

Crude petroleum/natural gas production

**NAICS**

211120

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## PUBLIC FILINGS

The following data includes both open and closed filings 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	01/26/2017
UCCs	39	08/22/2018

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

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## COMMERCIAL CREDIT SCORE CLASS

Commercial Credit Score Class : 2 Ⓞ

Low Risk:1 ; High Risk:5

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## FINANCIAL STRESS SCORE CLASS

Financial Stress Score Class : 3 Ⓞ

Low Risk:1 ; High Risk:5

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## PAYDEX® TREND CHART

### Predictive Scores

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#### 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:

### Viability Score

Compared to All US Businesses within the D&B Database:

- 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 %**

### Portfolio Comparison

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 %**

### Data Depth Indicator

Data Depth Indicator:

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

### Company Profile:

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+**

**G**

Financial Data	Trade Payments	Company Size	Years in Business
Not Available	Available: 3+Trade	Large	Established

## 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.

**Sales:** 1,400,000,000

**Number of Employees Total:** 190 (UNDETERMINED here)

**Payment Activity**

**(based on 55 experiences)**

Average High Credit:	\$27,330
Highest Credit:	\$500,000
Total Highest Credit:	\$1,085,950

**Below is an overview of the company's rating history since 06-18-2003.**

**D&B Rating**

**Date Applied**

1R3	03/27/2018
--	08/09/2017
1R2	12/10/2015
1R3	09/03/2014
1R2	04/16/2013
1R3	01/10/2013
1R2	04/17/2007
5A1	11/03/2004
5A2	11/26/2003
4A2	06/18/2003

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**Public Filings**

**SUITS**

<b>Status</b>	<b>Pending</b>
<b>DOCKET NO.</b>	17CV000863
<b>Plaintiff</b>	CLOUD MARKETING INC.
<b>Defendant</b>	IGS ENERGY
<b>Where filed</b>	FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OH
<b>Date status attained</b>	01-26-2017

**Date filed**

01-26-2017

**Latest Info Received**

02-24-2017

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.

The public record items contained in this report may have been paid, terminated, vacated or released prior to the date this report was printed.

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## History & Operations

### COMPANY OVERVIEW

<b>Company Name</b>	<b>Phone</b>	<b>History</b>
INTERSTATE GAS SUPPLY, INC.	614 659-5000	CLEAR
<b>Doing Business As</b>	<b>URL</b>	<b>Present management control</b>
INTERSTATE GAS SUPPLY IGS ENERGY	<a href="http://www.igsenergy.com">www.igsenergy.com</a>	29 years
<b>Street Address</b>		
6100 Emerald Parkway Dublin, OH 43016		
<b>Mailing Address:</b>		
PO Box 9060 Dublin OH 43017		
<b>Annual Sales</b>		
\$1,400,000,000.00		

### BUSINESS REGISTRATION

CORPORATE AND BUSINESS REGISTRATIONS REPORTED BY THE SECRETARY OF STATE OR OTHER OFFICIAL 09/ SOURCE AS OF

<b>Registered Name:</b>	INTERSTATE GAS SUPPLY, INC.
<b>Business type:</b>	CORPORATION
<b>Corporation type:</b>	PROFIT
<b>Date incorporated:</b>	08/09/1989

**State of incorporation:** OHIO

**Filing date:** 08/09/1989

**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

**Principals:** SCOTT L WHITE INCORPORATOR

Common Stocks:

Authorized shares:

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## 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

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