

PUCO EXHIBIT FILINGDate of Hearing: September 19, 2019Case No. 19-957-GE-COI

PUCO Case Caption: In the Matter of the Commission's
Investigation into PALMco Power OH, LLC d/b/a
Indra Energy and PALMco Energy OH, LLC d/b/a
Indra Energy's Compliance with the Ohio Administrative
Code and Potential Remedial Actions for Non-Compliance.

List of exhibits being filed:

OCC Exhibits 3, 4, 9, 10

PUCO

2019 OCT -4 PM 2:01

RECEIVED-DOCKETING DIV

Reporter's Signature: Carolyn M. Burke

Date Submitted: 10/3/2019

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the digital format of business. 10/4/19
 Date Produced 10/4/19
 Technician

FILE

RECEIVED-ROCKETING DIV

2019 OCT -4 PM 2:01

CASE NUMBER:	10-0138-GA-CRS PUCO
CASE DESCRIPTION:	PALMCO ENERGY OH LLC dba INDRA ENERGY
DOCUMENT SIGNED ON:	9/16/2019
DATE OF SERVICE:	

05/01/2019	Notice of Material Change electronically filed by Ms. Rebekah J. Glover on behalf of PALMco Energy OH, LLC d/b/a Indra Energy.
04/16/2019	Staff letter requesting a Commission Ordered Investigation filed by R. Fadley on behalf of PUCO Staff.
03/15/2019	Notice of Material Change: Contact Person for Customer Complaints filed by C. Gelo on behalf of PALMco Energy OH, LLC dba Indra Energy.
11/09/2018	Notice of material change, amended Exhibit A-5 - Updated Regulatory Contact electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
10/29/2018	Notice of Material Change updating License Information electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
08/27/2018	Notification Operations Update electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
07/05/2018	Updated Operations Information electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
05/24/2018	Notice of material change in Operations Information electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
05/02/2018	Revised Renewal Certificate No. 10-180G(5) issued.
04/30/2018	Confidential Document Target for Exhibit C-3 filed by J. Coleman on behalf of PALMCo Power OH LLC. (36 pages)
04/27/2018	Notice of Material Change for Fictitious Name electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
02/22/2018	Renewal Certificate No. 10-180G(5) issued.
01/16/2018	Confidential Document Target for financial statements filed by J. Coleman on behalf of PALMco Energy Ohio, LLC. (74 pages)
01/16/2018	Renewal application of PALMco Energy Ohio, LLC for certification as a competitive retail natural gas supplier filed by Jennifer Coleman.
08/28/2017	Correspondence for CT Notification for PALMco Energy OH, LLC electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
06/12/2017	Notification of Updated Regulatory Contact electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC.
04/04/2017	Notice of Updated Contact Information electronically filed by Briana Dudas on behalf of PALMco Energy OH, LLC.
12/22/2016	Notice of Withdrawal of Counsel electronically filed by Dina L Vespia on behalf of Cullen and Dykman LLP.
08/25/2016	Notification Material Change of Business Address electronically filed by Briana Dudas on behalf of

	PALMco Energy OH, LLC.
02/16/2016	Renewal Certificate # 10-180G(4) issued.
02/02/2016	Confidential document target: revised exhibit C-4, filed by Dina Vespia on behalf of Palmco Energy Ohio, LLC. (4 pages)
01/14/2016	Confidential document target - Exhibits C-3, C-4, and C-5, Attachment 1 of Exhibit D filed on behalf of Palmco Energy OH, LLC by D. Vespia. (101 pages)
01/14/2016	Motion for protective order and memorandum in support filed on behalf of Palmco Energy OH, LLC by D. Vespia.
01/14/2016	Renewal application for certification as a Competitive Retail Natural Gas Supplier filed on behalf of Palmco Energy OH, LLC by D. Vespia.
05/02/2014	Confidential document release: Exhibit C-4 originally filed on 2/5/10.
05/01/2014	Service Notice
05/01/2014	Attorney Examiner Entry ordering that the motions for a protective order and for extension of prior protective orders filed by the Palmco Companies be granted with regard to confidential exhibits C-3, C-4, and C-5 of the companies' renewal applications for certification as a competitive retail natural gas and electric marketer. The Entry directs the Commission's docketing division to keep exhibits C-3, C-4, and C-5 under seal for a period of 24 months. The Entry also directs the Commission's docketing division to release exhibits covered by expired protective orders into the public record; electronically filed by Vesta R Miller on behalf of Kerry K. Sheets, Attorney Examiner, Public Utilities Commission of Ohio
02/18/2014	Renewal Certificate No. 10-180G(3) issued.
01/14/2014	Renewal Application for Competitive Retail Natural Gas Suppliers filed by Dina L. Vespia on behalf of Palmco Energy OH, LLC.
01/14/2014	Motion for Protective Order and Memorandum in Support filed by Dina L. Vespia on behalf of Palmco Energy OH, LLC.
01/14/2014	Confidential treatment of documents: Exhibits C-3, C-4, & C5 filed by Dina Vespia on behalf of Palmco Energy OH, LLC (pg ct 85)
01/06/2014	Motion for Permission to Appear Pro Hac Vice electronically filed by Dina L Vespia on behalf of Palmco Energy OH, LLC
04/20/2012	Service Notice
04/20/2012	Entry granting motion for admission pro hac vice in accordance with Finding (4) and the extension of protective orders for 24 months ending on February 13, 2014, in case 10-138, and March 8, 2014, in case 10-139. (KKS)
02/13/2012	Renewal certificate 10-180(G)2 issued.
01/18/2012	Certificate pro hac vice of Peter Metzger filed by P. Metzger on behalf of Palmco Energy, Ohio, LLC.
01/17/2012	Certificate Pro Hac Vice Registration Certificate electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC.
01/17/2012	Cover Letter for Filing of Pro Hac Vice Registration Certificate electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC.
01/13/2012	Affidavit for Pro Hac Vice Registration electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC
01/13/2012	Motion to Appear Pro Hac Vice electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC
01/13/2012	Memorandum in Support electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC
01/13/2012	Confidential treatment of document: Financials filed by R. Seidler on behalf of Palmco Power OH LLC.
01/13/2012	Motion for Protective order and Extension of prior protective order and memorandum in support of motion for protective order and extension of prior protective order filed by Peter M. Metzger on behalf of Palmco Energy OH, LLC.
01/13/2012	Motion for permission to appear Pro Hac Vice filed by Peter M. Metzger on behalf of Palmco Energy OH, LLC.

<u>01/13/2012</u>	Memorandum in support of motion for protective order and extension of prior protective order filed by Peter M. Metzger on behalf of Palmco Energy OH, LLC.
<u>01/13/2012</u>	Renewal certification application for competitive retail natural gas suppliers of Palmco Energy OH, LLC, filed by Peter M. Metzger.
<u>01/12/2012</u>	Motion for Protective Order and Extension of Prior Protective Order electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC
<u>01/12/2012</u>	Application for Renewal Certification electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC
<u>01/12/2012</u>	Correspondence Cover Letter to Application for Renewal Certification electronically filed by Peter M Metzger on behalf of Palmco Energy OH, LLC
<u>03/17/2010</u>	Service Notice
<u>03/17/2010</u>	Entry ordering that the motion for protective order filed by Palmco Energy be granted with regard to the information contained in the Columbia financials, filed as part of exhibit C-4 of Palmco Energy's application; to be maintained under seal for a period of 24 months, ending on March 8, 2012. (HPG)
<u>03/08/2010</u>	Certificate 10-180G(1) issued.
<u>03/02/2010</u>	Executed guarantee from Columbia Utilities, LLC and Columbia Utilities Power, LLC filed by R. Palmese on behalf of Palmco Energy, Oh, LLC. (original)
<u>03/02/2010</u>	Letter requesting Peter M. Metzger be added as a party of record filed by P. Metzger.
<u>03/01/2010</u>	Executed guarantee from Columbia Utilities, LLC and Columbia Utilities Power, LLC filed by R. Palmese on behalf of Palmco Energy, OH, LLC. (FAX)
<u>03/01/2010</u>	Letter requesting Peter M. Metzger be added as a party of record. (FAX)
<u>02/05/2010</u>	Confidential Document Target for financial statements filed by P. Metzger on behalf of Palmco Energy Oh, LLC.
<u>02/05/2010</u>	Motion for protective order and memorandum in support filed by P. Metzger on behalf of Palmco Energy Oh, LLC.
<u>02/05/2010</u>	In the matter of the application of Palmco Energy OH, LLC for a certification as natural gas supplier.

FILE



RECEIVED-DOCKETING DIV

2018 JAN 16 PM 1:27

PUCO

47
PALMcoEnergy
8751 18th Avenue
Brooklyn, NY 11214

w PalmcoEnergy.com
e CustomerService@PalmcoEnergy.com
toll free 1 (877) 726 5862

January 11, 2018

Via FedEx

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

Re: PALMco Energy OH, LLC ("PALMco")
Renewal Certificate Application
Certificate No. 10-180-GA-CRS(4)

10-138-GA-CRS

To the Public Utilities Commission of Ohio:

Enclosed for filing with Public Utilities Commission of Ohio is an original, plus three (3) copies, of PALMco Energy OH, LLC's Natural Gas Renewal Certificate Application and Exhibits.

Pursuant to Ohio Administrative Code 4901:1-27-08, PALMco respectfully requests its financial statements and forecasted financial statements, attached herein as Exhibit C-3 and C-5, be afforded confidential treatment for a period of six years.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Coleman".

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Energy OH, LLC

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician le Date Processed 1/16/18



**Public Utilities
Commission**

PUCO USE ONLY - Version 1.08 May 2016		
Date Received	Renewal Certification Number	ORIGINAL CRS Case Number
		10 - 0138 - GA-CRS

**RENEWAL CERTIFICATION APPLICATION
COMPETITIVE RETAIL NATURAL GAS SUPPLIERS**

Please **type or print** all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit A-15 - Company History*). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus, Ohio 43215-3793.

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

SECTION A - APPLICANT INFORMATION AND SERVICES

A-1 Applicant intends to renew its certificate as: (check all that apply)

☐ Retail Natural Gas Aggregator ☐ Retail Natural Gas Broker ☒ Retail Natural Gas Marketer

A-2 Applicant information:

Legal Name PALMco Energy OH, LLC
Address 8751 18th Avenue, Brooklyn, NY 11214
Telephone No. 718-851-6655 ext. 8 Web site Address <https://palmcoenergy.com/>
Current PUCO Certificate No. 10-180G(4) Effective Dates 2/14/16-2/14/18

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

Name PALMco Energy OH, LLC
Address 8751 18th Avenue, Brooklyn, NY 11214
Web site Address <https://palmcoenergy.com/> Telephone No. 718-851-6655 ext. 8

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

PALMco Energy OH, LLC
PALMco

A-5 Contact person for regulatory or emergency matters:

Name Jennifer Coleman Title Regulatory Manager
Business Address 8751 18th Avenue, Brooklyn, NY 11214
Telephone No. 718-975-9018 Fax No. 718-851-2427 Email Address Regulatory@palmcoenergy.com

RECEIVED-DOCKETING DIV
2018 JAN 16 PM 1:28
PUCO

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

Name Thomas Sheehy Title Compliance Officer
Business address 8751 18th Avenue, Brooklyn, NY 11214
Telephone No. 718-975-6601 Fax No. 718-851-2427 Email Address compliance@palmcoenergy.com

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

Customer service address 8751 18th Avenue, Brooklyn, NY 11214
Toll-Free Telephone No. 877-726-5862 Fax No. 718-851-2427 Email Address CustomerService@PalmcoE

A-8 Provide "Proof of an Ohio Office and Employee," in accordance with Section 4929.22 of the Ohio Revised Code, by listing name, Ohio office address, telephone number, and Web site address of the designated Ohio Employee

Name Eileen Ficken Title Office Administrator
Business address 4807 Rockside Road, Suite 400, Independence, OH 44131
Telephone No. 216-642-8244 Fax No. 718-851-2427 Email Address compliance@palmcoenergy.com

A-9 Applicant's federal employer identification number 32-0274233

A-10 Applicant's form of ownership: (Check one)

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

A-11 (Check all that apply) Identify each natural gas company service area in which the applicant is currently providing service or intends to provide service, including identification of each customer class that the applicant is currently serving or intends to serve, for example: *residential, small commercial, and/or large commercial/industrial (mercantile) customers*. (A mercantile customer, as defined in Section 4929.01(L)(1) of the Ohio Revised Code, means a customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within the state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside of this state. In accordance with Section 4929.01(L)(2) of the Ohio Revised Code, "Mercantile customer" excludes a not-for-profit customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within this state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside this state that has filed the necessary declaration with the Public Utilities Commission.)

<input checked="" type="checkbox"/> Columbia Gas of Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Dominion East Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Duke Energy Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Vectren Energy Delivery of Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input type="checkbox"/> Large Commercial / Industrial

A-12 If applicant or an affiliated interest previously participated in any of Ohio's Natural Gas Choice Programs, for each service area and customer class, provide approximate start date(s) and/or end date(s) that the applicant began delivering and/or ended services.

☒ **Columbia Gas of Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	07/2012	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	9/2012	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service		End Date
<input type="checkbox"/> Industrial	Beginning Date of Service		End Date

☒ **Dominion East Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	10/2012	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	11/2012	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service		End Date
<input type="checkbox"/> Industrial	Beginning Date of Service		End Date

☒ **Duke Energy Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	06/2012	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	11/2012	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service		End Date
<input type="checkbox"/> Industrial	Beginning Date of Service		End Date

☐ **Vectren Energy Delivery of Ohio**

<input checked="" type="checkbox"/> Residential	Beginning Date of Service	08/2013	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service	08/2013	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service		End Date
<input type="checkbox"/> Industrial	Beginning Date of Service		End Date

A-13 If not currently participating in any of Ohio's four Natural Gas Choice Programs, provide the approximate start date that the applicant proposes to begin delivering services:

<input type="checkbox"/>	Columbia Gas of Ohio	Intended Start Date	N/A
<input type="checkbox"/>	Dominion East Ohio	Intended Start Date	N/A
<input type="checkbox"/>	Duke Energy Ohio	Intended Start Date	N/A
<input type="checkbox"/>	Vectren Energy Delivery of Ohio	Intended Start Date	N/A

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- A-14 **Exhibit A-14 "Principal Officers, Directors & Partners,"** provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.
- A-15 **Exhibit A-15 "Company History,"** provide a concise description of the applicant's company history and principal business interests.
- A-16 **Exhibit A-16 "Articles of Incorporation and Bylaws,"** provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto, *only if the contents of the originally filed documents changed since the initial application.*
- A-17 **Exhibit A-17 "Secretary of State,"** provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- B-1 **Exhibit B-1 "Jurisdictions of Operation,"** provide a current list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail natural gas service, or retail/wholesale electric services.
- B-2 **Exhibit B-2 "Experience & Plans,"** provide a current description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.
- B-3 **Exhibit B-3 "Summary of Experience,"** provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking renewed certification (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).
- B-4 **Exhibit B-4 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational

status or ability to provide the services for which it is seeking renewed certification since applicant last filed for certification.

- B-5 Exhibit B-5 "Disclosure of Consumer Protection Violations,"** disclose whether the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant has been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws since applicant last filed for certification.

☒ No ☐ Yes

If Yes, provide a separate attachment labeled as Exhibit B-5 "Disclosure of Consumer Protection Violations," detailing such violation(s) and providing all relevant documents.

- B-6 Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation,"** disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, or revoked, or whether the applicant or predecessor has been terminated from any of Ohio's Natural Gas Choice programs, or been in default for failure to deliver natural gas since applicant last filed for certification.

☒ No ☐ Yes

If Yes, provide a separate attachment, labeled as Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation," detailing such action(s) and providing all relevant documents.

SECTION C - APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- C-1 Exhibit C-1 "Annual Reports,"** provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information, labeled as Exhibit C-1, or indicate that Exhibit C-1 is not applicable and why.
(This is generally only applicable to publicly traded companies who publish annual reports.)
- C-2 Exhibit C-2 "SEC Filings,"** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. An applicant may submit a current link to the filings or provide them in paper form. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that the applicant is not required to file with the SEC and why.
- C-3 Exhibit C-3 "Financial Statements,"** provide copies of the applicant's two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer certified financial statements covering the life of the business. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns (with social security numbers and account numbers redacted).
- C-4 Exhibit C-4 "Financial Arrangements,"** provide copies of the applicant's current financial arrangements to conduct competitive retail natural gas service (CRNGS) as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.)

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

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

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

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

C-5 Exhibit C-5 "Forecasted Financial Statements," provide two years of forecasted income statements for the applicant's **NATURAL GAS related business activities in the state of Ohio Only**, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer. The forecasts should be in an annualized format for the two years succeeding the Application year.

C-6 Exhibit C-6 "Credit Rating," provide a statement disclosing the applicant's current credit rating as reported by two of the following organizations: Duff & Phelps, Fitch IBCA, Moody's Investors Service, Standard & Poor's, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or an affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant. If an applicant or its parent does not have such a credit rating, enter "N/A" in Exhibit C-6.

- C-7 Exhibit C-7 "Credit Report,"** provide a copy of the applicant's current credit report from 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.
- C-8 Exhibit C-8 "Bankruptcy Information,"** provide a list and description of any reorganizations, protection from creditors, or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.
- C-9 Exhibit C-9 "Merger Information,"** provide a statement describing any dissolution or merger or acquisition of the applicant within the two most recent years preceding the application.
- C-10 Exhibit C-10 "Corporate Structure,"** provide a description of the applicant's corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate within the two most recent years preceding the application.

SECTION D – APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

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

Applicant Signature and Title

Ric Plana, Managing Member

Sworn and subscribed before me this

11th

day of

January

Month

2018

Year

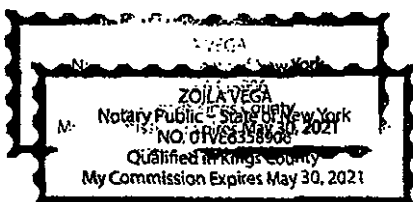
Zola Vega

Signature of official administering oath

Zola Vega

Print Name and Title

Notary Public



My commission expires on

5/30/18



The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service
Affidavit Form
(Version 1.07)

In the Matter of the Application of)

PALMco Energy OH, LLC)

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

Case No. 10 - 0138 -GA-CRS

County of KINGS

State of NEW YORK

Robert Palmese

[Affiant], being duly sworn/affirmed, hereby states that:

- (1) The information provided within the certification or certification renewal application and supporting information is complete, true, and accurate to the best knowledge of affiant.
- (2) The applicant will timely file an annual report of its intrastate gross receipts and sales of hundred cubic feet of natural gas pursuant to Sections 4905.10(A), 4911.18(A), and 4929.23(B), Ohio Revised Code.
- (3) The applicant will timely pay any assessment made pursuant to Section 4905.10 or Section 4911.18(A), Ohio Revised Code.
- (4) Applicant will comply with all applicable rules and orders adopted by the Public Utilities Commission of Ohio pursuant to Title 49, Ohio Revised Code.
- (5) Applicant will cooperate with the Public Utilities Commission of Ohio and its staff in the investigation of any consumer complaint regarding any service offered or provided by the applicant.
- (6) Applicant will comply with Section 4929.21, Ohio Revised Code, regarding consent to the jurisdiction of the Ohio courts and the service of process.
- (7) Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the certification or certification renewal application within 30 days of such material change, including any change in contact person for regulatory or emergency purposes or contact person for Staff use in investigating customer complaints.
- (8) Affiant further sayeth naught.

Affiant Signature & Title

Robert Palmese Managing Member

Sworn and subscribed before me this

11th

day of

January

Month

2018

Year

Zoila Vega
Signature of Official Administering Oath

Zoila Vega Notary Public
Print Name and Title



My commission expires on

5/30/21

(CRNGS Supplier Renewal) - Version 1.08

Page 8 of 8

Exhibit A-14
Principal Officers, Directors, & Partners

Robert Palmese, *President/ Managing Member*

8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-851-6655 ext. 8

Michelle Hofstette, *Chief Financial Officer*

8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-975-6605

Robert Blake, *Vice President of Operations*

8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-696-0131

Adam Bashe, *Vice President of Business Development and Chief Sales Officer*

8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-696-0129

Byron Farnsworth, Jr., *Vice President of Supply and Scheduling*

8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-696-0121

Jennifer Coleman, *Regulatory Manager*

8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-975-9018

Exhibit A-15
Company History

PALMco Energy OH, LLC (hereinafter "PALMco") was formed as an Ohio Limited Liability Company in January 2009. It was first licensed as an Ohio natural gas supplier in 2010. PALMco began selling natural gas in Ohio at retail in 2012.

PALMco currently serves approximately 11,000 natural gas customers. PALMco sells gas at retail in the service territories of Columbia Gas of Ohio, Dominion East Ohio, Duke Energy Ohio, and Vectren Energy Delivery of Ohio.

Exhibit A-16
Articles of Incorporation and Bylaws

There has been no change to PALMco's Articles of Incorporation or Bylaws, since the original application.

Exhibit A-17
Secretary of State

Attached is confirmation that PALMco is in good standing and currently registered with the Ohio Secretary of State.

Jon Husted Ohio Secretary

[Jon Husted & the Office](#) | [Elections & Voting](#) | [Campaign Finance](#) | [Legislation & Ballot Issues](#) | [Businesses](#) | [Records](#) | [Media Center](#) | [Publications](#)

Business Filing Portal

[Print this report](#)

Corporation Details

Corporation Details		
Entity Number	1832534	
Business Name	PALMCO ENERGY OH LLC	
Filing Type	DOMESTIC LIMITED LIABILITY COMPANY	
Status	Active	
Original Filing Date	01/28/2009	
Expiry Date		
Location:	County:	State:
Agent / Registrant Information		
CORPORATION SERVICE COMPANY 50 WEST BROAD STREET SUITE 1330 COLUMBUS, OH 43215 Effective Date: 11/10/2016 Contact Status: Active		
Incorporator Information		
ROBERT PALMESE		
Filings		
Filing Type	Date of Filing	Document Number/Image
ARTICLES OF ORGNZTN/DOM. PROFIT LIM.LIAB. CO.	01/28/2009	200902902670
AGENT ADDRESS CHANGE/LIMITED/LIABILITY/PARTNERS	11/10/2016	201632602630

Exhibit B-1
Jurisdictions of Operation

PALMco Energy OH, LLC is a stand-alone entity, rather than subsidiaries of a corporate parent. The individual members of the Ohio PALMco entity also own, in whole or in part, entities in other jurisdictions that are engaged in the retail sale of electricity and natural gas. The entities are as follows:

Name: Columbia Utilities, LLC (Electric) and Columbia Utilities Power, LLC (Gas)
License Number/ State of Issuance: N/A, New York

Name: PALMco Power CA, LLC (Electric)
License Number/ State of Issuance: ESP NO. 1387/California

Name: PALMco Energy CT, LLC (Gas)
License Number/ State of Issuance: 09-01/ Connecticut

Name: PALMco Power DC, LLC (Electric) and PALMco Energy DC, LLC (Gas)
License Number/ State of Issuance: EA 2016-16/ District of Columbia (Electric) and GA 2016-05/ District of Columbia (Gas)

Name: PALMco Power DE, LLC (Electric)
License Number/ State of Issuance: 16-0929/ Delaware (Electric)

Name: PALMco Power IL, LLC (Electric) and PALMco Energy IL, LLC (Gas)
License Number/ State of Issuance: 12-0269/ Illinois (Electric) and 12-0395/ Illinois (Gas)

Name: PALMco Power MA, LLC (Electric) and PALMco Energy MA, LLC (Gas)
License Number/ State of Issuance: CS-092/ Massachusetts (Electric) and GS-046/ Massachusetts (Gas)

Name: PALMco Power MD, LLC (Electric) and PALMco Energy MD, LLC (Gas)
License Number/ State of Issuance: IR-1804/ Maryland (Electric) and IR-1803/ Maryland (Gas)

Name: PALMco Power NJ, LLC (Electric) and PALMco Energy NJ, LLC (Gas)
License Number/ State of Issuance: ESL-0049/ New Jersey (Electric) and GSL-0033/ New Jersey (Gas)

Exhibit B-1
Jurisdictions of Operation
(continued)

Name: PALMco Power NY, LLC (Electric) and PALMco Energy NY, LLC (Gas)
License Number/ State of Issuance: N/A, New York

Name: PALMco Power OH, LLC (Electric)
License Number/ State of Issuance: 10-199E(4)/ Ohio (Electric)

Name: PALMco Power PA, LLC (Electric) and PALMco Energy PA, LLC (Gas)
License Number/ State of Issuance: A-2009-2108338/ Pennsylvania (Electric) and A-2009-2100320/ Pennsylvania (Gas)

Name: PALMco Energy VA, LLC (Gas)
License Number/ State of Issuance: G-49/ Virginia

Exhibit B-2
Experience & Plans

Experience.

Since PALMco's last license renewal application, PALMco has taken several affirmative steps to modify its business practices and procedures. First, PALMco has made significant managerial investments to enhance its capabilities. This includes hiring the following experienced energy industry individuals to conduct oversight and management of essential functions of the business: operations, sales, supply, and regulatory compliance. The addition of a new management team has provided greater control, monitoring and oversight of the business operations and has resulted in significant cultural changes at the company including a comprehensive top-down approach to compliance and regular weekly meetings to identify, discuss, and address issues effectively across departments. There is an ongoing dialogue to implement constant improvements in accordance with best practices in the industry. These individuals, with a summary of their experience and education, are listed in Exhibit D-3.

Plans.

In order to contract with customers, PALMco hires third party vendors to market its services through door-to-door and telesales solicitations. All third party vendors hired by PALMco undergo a training program to ensure compliance with applicable laws and regulations. PALMco also employs a Sales Channel Manager to communicate regularly with vendors for any regulatory updates, agent training concerns, and changes to any marketing materials. In addition, customers may enroll on PALMco's website at <https://palmcoenergy.com/ohio/>.

To ensure compliance and proper authorization of customer accounts, PALMco implemented a new customer relationship management software system ("CRM"). The CRM provides a significant improvement in the areas of sales data retention and organization, management oversight and speed of the quality assurance process, as well as performance reporting of sales vendors, specific sales agents, and quality assurance team members performing reviews. The system facilitates analysis of data and allows for better tracking to enhance oversight and monitoring of sales and marketing activities. The CRM also allows the Compliance and Customer Service Teams to effectively respond to customer complaints and inquiries. To that end, PALMco has an onsite Customer Service Department to respond to any customer communications.

Exhibit B-2
Experience & Plans
(continued)

PALMco does not provide its own billing services to customers. Instead, PALMco has opted to have local gas utilities provide consolidated billing services on its behalf and on behalf of its customers. PALMco has contracted with Energy Services Group for its EDI and customer account billing. Furthermore, PALMco has an internal Billing and Operations Team to communicate, on a daily basis, with utilities and provide billing and transaction analysis.

Exhibit B-3
Summary of Experience

PALMco began selling natural gas within the state of Ohio in 2012. Currently, PALMco serves 10,000 natural gas customers within the state. Between all the PALMco entities listed in Exhibit B-1, PALMco currently serves about 22,000 natural gas customers.

In 2016, PALMco sold a total of 75,572 Dekatherms in the state of Ohio. In 2016, between all the PALMco entities listed in Exhibit B-1, PALMco sold a total of 1,077,696 Dekatherms.

Exhibit B-4
Disclosure of Liabilities and Investigations

PALMco Energy OH, LLC is a stand-alone entity, rather than subsidiaries of a corporate parent. While the below disclosures will not affect PALMco's financial or operational capabilities in Ohio, in the interest of full disclosure, other PALMco entities have had the following investigations, since PALMco last filed for renewal:

Connecticut

Application of PALMco Power CT, LLC For An Electric Supplier License – Investigation of Marketing and Enrollment Practices

Connecticut Public Utilities Regulatory Authority ("Authority")
Docket No. 10-01-24RE01

By Decision dated February 25, 2015, the Authority notified PALMco that it opened a docket "to examine PALMco's marketing and enrollment practices, and compliance with record retention requirements and other terms of its supplier license." A joint settlement between all participants was reached and a final decision was entered by the Authority on August 16, 2017. As part of the settlement, PALMco agreed to voluntarily relinquish its electric license in the state of Connecticut for a period of five years.

New Jersey

Lougy v. PALMco Power NJ, LLC and PALMco Energy NJ, LLC

Superior Court of New Jersey
Docket No. MER-C-33-14

On May 28, 2014, the New Jersey Attorney General's Office ("NJ AG") filed a complaint against PALMco Power NJ, LLC and PALMco Energy NJ, LLC (collectively "PALMco NJ"), in New Jersey Superior Court. The complaint, which arose out of the 2013-2014 winter Polar Vortex, alleged that PALMco NJ had violated certain New Jersey consumer protection laws and New Jersey Board of Public Utilities' regulations.

On May 23, 2016, PALMco entered into a settlement agreement with the NJ AG. As part of the settlement, PALMco NJ agreed to undertake various remedial measures related to PALMco NJ's marketing materials and practices. PALMco also agreed to pay restitution to customers and a civil penalty in the amount of \$500,000 as a part of the settlement. PALMco continues to sell retail electricity and natural gas to customers in the state of New Jersey.

Exhibit B-4
Disclosure of Liabilities and Investigations
(Continued)

Illinois

The People of the State of Illinois vs. PALMco Power IL, LLC

On March 9, 2017 the Illinois Attorney General ("IL AG") filed a complaint against PALMco Power IL, LLC under the Consumer Fraud and Deceptive Business Practices Act. On October 11, 2017, PALMco entered into a settlement agreement with the IL AG. PALMco agreed to pay restitution to customers and a voluntary contribution to the Attorney General in the amount of \$20,000.00. PALMco continues to sell retail electricity to customers in the state of Illinois.

Gress v. PALMco Energy IL, LLC

Circuit Court for the 12th Judicial Circuit
Case No. 17MR1477

On May 30, 2017 William Gress and Denise Gress filed a complaint against PALMco Energy IL, LLC under the Illinois Restricted Call Registry Act. The matter is ongoing and PALMco is cooperating with Plaintiffs' counsel.

Exhibit B-5
Disclosure of Consumer Protection Violations

None.

Exhibit B-6
Disclosure of Certification Denial, Curtailment, Suspension, or Revocation

None.

Exhibit C-1
Annual Reports

PALMco is a privately owned limited liability company. Thus, it is not required to prepare annual reports or any similar documents for its shareholders or owners.

Exhibit C-2
SEC Filings

PALMCo is not required to file with the SEC because it is a privately owned limited liability company.

Exhibit C-3
Financial Statements
REDACTED

Due to the confidential and proprietary nature of PALMco's financial statements, the statements have been redacted and filed under confidential seal.

Exhibit C-4
Financial Arrangements

Attached please find current statements from Duke Energy Corporation, The East Ohio Gas Company, Columbia Gas of Ohio, and Vectren Energy ("collectively LDUs") demonstrating PALMco meets the LDUs' collateral requirements.



139 East Fourth
EM740
Cincinnati, Ohio 45202

December 15, 2017

Palmco Energy OH, LLC has met the Gas Collateral obligations for Duke Energy Corporation as of December 15, 2017.

Tom Hunt

Duke Energy Corp
Certified Supplier Business Center
Tom.Hunt@Duke-Energy.com





Dominion Energy Ohio
1201 East 55th Street
Cleveland, OH 44103

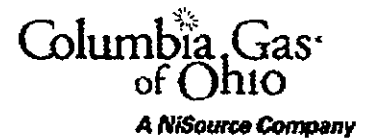
December 18, 2017

PALMCo Energy OH LLC has met the natural gas collateral obligations for The East Ohio Gas Company dba Dominion Energy Ohio as of December 18, 2017.

Thank you,

Clifford E. Andrews

Clifford E. Andrews
Authorized Representative



Thursday, December 14, 2017

PALMco Energy OH LLC
Attn: Alan Klein
8751 18th Ave
Brooklyn, NY 11214

Re: Columbia Gas of Ohio Collateral Requirements

To Whom It May Concern:

PALMco Energy OH LLC has complied with Columbia Gas of Ohio's collateral requirements.

Sincerely,

Michele Caddell
Michele Caddell
Director, Transportation Programs and Nominations



Vectren Corporation
P.O. Box 209
Evansville, IN 47702-0209

December 13, 2017

Alan Klein
Assistant Controller
Palmco Energy OH, LLC
8751 18th Avenue
Brooklyn, NY 11214
aklein@palmcoenergy.com
(718) 851-6655

RE: PUCO Renewal

Dear Mr. Klein:

Please use this letter as confirmation that Palmco Energy Ohio, LLC has met the collateral requirements for Vectren's Choice Program in Ohio.

Sincerely,

Emily Lamb

Emily Lamb
Analyst, Enterprise Risk Management
Vectren Corporation
One Vectren Square
Evansville, IN 47708-1251
elamb@vectren.com
(812) 491-4245

Exhibit C-5
Forecasted Financial Statements
REDACTED

Due to the confidential and proprietary nature of PALMco's forecasted financial statements, the statements have been redacted and filed under confidential seal.

Exhibit C-6
Credit Rating

As neither PALMco nor the other PALMco entities, listed in Exhibit B-1, are publicly traded, and each is privately owned, they do not have a credit rating from Duff & Phelps, Fitch IBCA, Moody's Investors Service, Standard & Poor's, or any similar organization. Please see Exhibit C-7 for PALMco's credit report.

Exhibit C-7
Credit Report

Please see PALMco's attached credit report from Dun and Bradstreet.

This Dun & Bradstreet report is provided for your company's internal review. It may not be used for any other purpose or shared.

Business Information Report

User Id: aklein@columbiautilities.com

Report Printed: Wednesday December 13, 2017 11:34 AM

Business Summary

Company Name: PALMCO ENERGY OH LLC
 Physical Address: 1350 60th St
 Physical City: Brooklyn
 Physical State: NY
 Physical Zip: 11219
 Telephone: 718 851-6655
 Year started: 2009
 Employs: 1
 History: INCOMPLETE
 SIC: 4924
 Line of business: Natural gas distribution

D-U-N-S Number: 830077736

Additional services to monitor and build your Dun & Bradstreet file are available through Dun & Bradstreet's CreditBuilder service. Good credit is the lifeline of your business. It enables you to obtain funding for things like expansion, capital expenditures, research and development, and staffing. To speak with a Credit Advisor today, call 888-814-1435.

Special Events

2011-10-16

Source(s) indicate the address shown above may no longer be used by this business.

History

The following information was reported 02/05/10:

Officer(s): ROBERT PALMESE, MEMBER

A check with the New York Secretary of State found no charter for the captioned business.

Business started 2009.

ROBERT PALMESE, Antecedents are unknown. 2006-present active as a member with Columbia Utilities Power, LLC, Brooklyn, NY.

Exact start date is undetermined. The original business report for the company was created by D&B on March 31, 2009. Since D&B can confirm ongoing operation from outside sources as of February 5, 2010, a reference start date of 2009 will be presented.

AFFILIATES:

The following are related through common principals, management and/or ownership: Columbia Utilities Power, LLC, Brooklyn, NY. Started '2006'. DUNS #787817283. Operates as engaged in energy generation (100%). Intercompany relations: None reported by management.

Business Registration

CORPORATE AND BUSINESS REGISTRATIONS REPORTED BY THE SECRETARY OF STATE OR OTHER OFFICIAL SOURCE AS OF 2017-12-01

Registered Name: PALMCO ENERGY OH LLC
 Business type: DOMESTIC LIMITED LIABILITY CO
 Corporation type:
 Date incorporated:
 State of incorporation: OHIO
 Filing date: 2009-01-28
 Registration ID: 1832534
 Status: ACTIVE
 Where filed: SECRETARY OF STATE/CORPORATIONS DIVISION,COLUMBUS,OH

Operations

2010-02-05

Description: Operates as a provider of natural gas distribution (100%).

Terms are undetermined. Sells to undetermined.

Employees: 1.

Facilities: Occupies premises in a building.

SIC & NAICS

SIC:

49240000

Natural gas distribution

NAICS:

221210

Natural Gas Distribution

PAYMENT SUMMARY

The Dun & Bradstreet Payment Summary is provided for your company's internal review. It may not be used for any other purpose or shared.

Below is an overview of the company's dollar-weighted payments, segmented by its suppliers' primary industries:

	Total Rcv'd (\$)	Total Dollar Amts (\$)	Largest High Credit (\$)	Within Terms (%)	Days Slow			
					<31 (%)	31-60 (%)	61-90 (%)	90+ (%)
Top Industries:								
Other payment categories:								
Cash experiences								
Payment record unknown								
Unfavorable comments								
Placed for collections:								
With Dun & Bradstreet								
Other								
Total in Dun & Bradstreet's file								

D&B receives over 600 million payment experiences each year. We enter these new and updated experiences into D&B Reports as this information is received. At this time, none of those experiences relate to this company.

FINANCE

2010-02-05

As of February 5, 2010, several attempts to contact the management of this business have been unsuccessful. Inside sources confirmed name of the captioned business.

Incomplete history caption has been applied due to the following factor(s):

-- Nature of legal structure has not been clearly established. -- Exact start date is undetermined.

As of February 5 2010 a search of Dun & Bradstreet's Public Record database found no open suits, liens, judgements or UCCs to which Palmco Energy OH LLC at 1350 60th St, Brooklyn NY was named defendant or debtor. Public records received hereafter will be entered into the database and will be included in reports which contain a Public Filings section.

PUBLIC FILINGS

The following Public Filing data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

UCC Filings

Collateral: All Negotiable instruments and proceeds - All Inventory and proceeds - All Account(s) and proceeds - All Contract rights and proceeds - and OTHERS

Type: Original

Sec. party: CITIBANK N A, IRVING, TX

Debtor: PALMCO ENERGY OH LLC

Filing number: OH00139705050

Filed with: SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH

Date filed: 01/15/2010

Latest Info Received: 01/27/2010

Original UCC filed date:

Original filing no.:

Collateral:

Type: Continuation

Sec. party: CITIBANK N A, IRVING, TX

Debtor: PALMCO ENERGY OH LLC

Filing number: 20142270137

Filed with: SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH

Date filed: 08/15/2014

Latest Info Received: 08/18/2014

Original UCC filed date: 01/15/2010

Original filing no.: OH00139705050

Collateral: Assets and proceeds

Type: Original

Sec. party: VECTREN ENERGY DELIVERY OF OHIO, INC., EVANSVILLE, IN

Debtor: PALMCO ENERGY OH LLC

Filing number: OH00158068081

12/13/2017

Dun & Bradstreet Business Information Report: PALMCO ENERGY OH LLC

Filed with: SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH
 Date filed: 05/02/2012
 This Dun & Bradstreet report is provided for your company's internal review. It may not be used for any other purpose or shared.
 Latest info received: 05/09/2012
 Original UCC filed date:
 Original filing no.:

Collateral:
 Type: Continuation
 Sec. party: VECTREN ENERGY DELIVERY OF OHIO, INC., EVANSVILLE, IN
 Debtor: PALMCO ENERGY OH LLC
 Filing number: 20171170286
 Filed with: SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH
 Date filed: 04/27/2017
 Latest Info Received: 05/01/2017
 Original UCC filed date: 05/02/2012
 Original filing no.: OH00158068081

Collateral: RIGHT, TITLE AND INTEREST and proceeds
 Type: Original
 Sec. party: COLUMBIA GAS OF OHIO, INC., COLUMBUS, OH
 Debtor: PALMCO ENERGY OH LLC
 Filing number: OH00161432180
 Filed with: SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH
 Date filed: 09/21/2012
 Latest Info Received: 10/02/2012
 Original UCC filed date:
 Original filing no.:

Collateral:
 Type: Continuation
 Sec. party: COLUMBIA GAS OF OHIO, INC., COLUMBUS, OH
 Debtor: PALMCO ENERGY OH LLC
 Filing number: SR11923
 Filed with: SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH
 Date filed: 08/15/2017
 Latest Info Received: 10/03/2017
 Original UCC filed date: 09/21/2012
 Original filing no.: OH00161432180

There are additional UCC's in Dun & Bradstreet's file on this company available by contacting 1-800-234-3867.

There are additional suits, liens, or judgments in Dun & Bradstreet's file on this company available by contacting.

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

Government Activity

Activity summary

Borrower (Dir/Guar):	NO
Administrative debt:	NO
Contractor:	NO
Grantee:	NO
Party excluded from federal program(s):	NO

Possible candidate for socio-economic program consideration

Labor surplus area:	N/A
Small Business:	N/A
8(A) firm:	N/A

The details provided in the Government Activity section are as reported to Dun & Bradstreet by the federal government and other sources.

Exhibit C-8
Bankruptcy Information

None.

Exhibit C-9
Merger Information

None.

Exhibit C-10
Corporate Structure

PALMco Energy OH, LLC is a stand-alone entity, rather than subsidiaries of a corporate parent. The individual members of the Ohio PALMco entity also own, in whole or in part, entities in other jurisdictions that are engaged in the retail sale of electricity and natural gas. Please see the attached chart listing all the PALMco entities.

Exhibit C-10 Corporate Structure

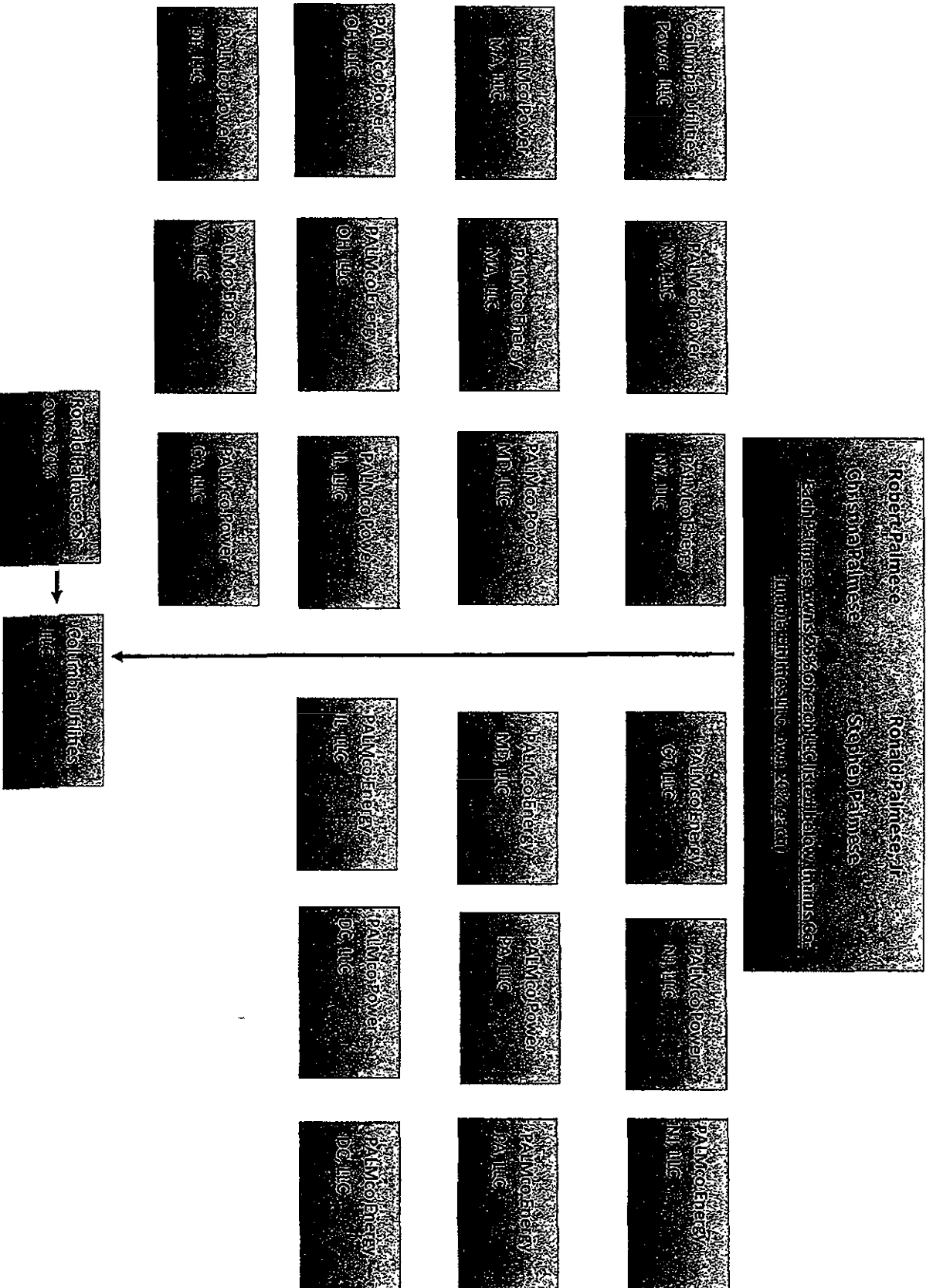


Exhibit D-1
Operations

PALMco in conjunction with its agents, will perform the necessary functions to provide natural gas competitive services in the state of Ohio. PALMco has a skilled management team to oversee operations within the company. Bryon Farnsworth, as Vice President of Supply and Scheduling, is responsible for the management, scheduling, and nomination of all natural gas within the state of Ohio. In addition to Mr. Farnsworth's skill set, PALMco also has a contractual relationship with Quantum Gas & Power Services, Ltd. In addition, Bob Blake, as Vice President of Operations, oversees a department comprised of twenty-five (25) individuals to assist in billing, compliance, and quality assurance of PALMco's day-to-day operations.

Exhibit D-2
Operations Expertise

Robert Palmese – Managing Member and President

Robert Palmese is the Managing Member of PALMco Energy OH, LLC (“PALMco”). Mr. Palmese has about 16 years’ experience selling natural gas at retail. He is in charge of the day-to-day operations of the PALMco entities that sell electric power and natural gas at retail in the states of Illinois, New York, New Jersey, Pennsylvania, Maryland, Massachusetts, Delaware, Virginia, and Washington D.C. Mr. Palmese graduated from Georgetown University with a Bachelor of Science degree in Business Administration.

Robert (“Bob”) Blake – Vice President of Operations

Mr. Blake began working for PALMco as a consultant in 2015 and joined PALMco full-time in 2016 as Vice President of Operations. In that capacity, Mr. Blake oversees the operation of the business of the PALMco, including market entries and strategies, billing system implementation and oversight, implementation and customer data migrations, and sales and marketing compliance. Mr. Blake has over 36 years’ experience in the energy industry, including 19 years working at retail energy suppliers (Xoom Energy, MX Energy, United Energy, Connectiv Energy) and 18 years working at a regulated utility company (United Illuminating, a Connecticut electric utility company). During this time, Mr. Blake served in a wide variety of roles related to customer operations, regulatory affairs, and product development. Mr. Blake has also served on professional boards and organizations, including the ISO New England (NEPOOL) Interruptible Loads Task Force. Mr. Blake holds an MBA from the University of New Haven and a Bachelor of Science in Mechanical Engineering from Worcester Polytechnic Institute.

Byron Farnsworth (“Barney”) – Vice President of Supply and Scheduling

Mr. Farnsworth joined PALMco, in his current position, in 2016. In his capacity as Vice President of Supply and Scheduling, Mr. Farnsworth is responsible for procuring electric and natural gas supply, hedging supply of electricity and natural gas to create fixed price products, and scheduling the load of electricity and natural gas supply in compliance with regulatory commission and utility company rules for delivery to customers. Mr. Farnsworth’s responsibilities also include forecasting PALMco’s delivery requirements and managing the company’s risk, ensuring compliance with applicable environmental and renewable energy standards, managing PALMco’s relationships with wholesale electricity and natural gas suppliers, and developing and implementing electricity and natural gas pricing models. Mr. Farnsworth has over 29 years in the energy industry, including over 10 years at regulated utility companies (New York State Electric & Gas, Rochester Gas and Electric) and over 19 years at deregulated energy supply companies (Your Energy Holdings, MX Energy, Energetix/NYSEG

Solutions). Mr. Farnsworth has experience working with many utilities and independent system operators, including PJM. Mr. Farnsworth holds a Bachelor of Science Degree in Electric/Mechanical Engineering and a Master of Business Administration from the Rochester Institute of Technology.

Laura Salvesen – Director of Billing and Operations

Ms. Salvesen has been working in the PALMco businesses since 2005. She currently serves as the Director of Billing and Operations, working closely with utilities on billing/transactional issues. Prior to becoming the Director of Billing and Operations, she served as a Compliance Officer, where she prepared regulatory filings, responded to customer complaints, and assisted in other regulatory compliance-related matters. Prior to that, she served as Supervisor of the customer service department, handling customer questions and complaints.

Exhibit D-3
Key Technical Personnel

Robert Palmese – Managing Member and President

Telephone: 718-851-6655 ext. 8

Email: RVPalmese@palmcoenergy.com

Robert Palmese is the Managing Member of PALMco Energy OH, LLC ("PALMco"). Mr. Palmese has about 16 years' experience selling electricity at retail. He is in charge of the day-to-day operations of Applicant and its various affiliates that sell electric power and natural gas at retail in the states of Illinois, New York, New Jersey, Pennsylvania, Maryland, Massachusetts, Delaware, Virginia, and Washington D.C. Mr. Palmese graduated from Georgetown University with a Bachelor of Science degree in Business Administration.

Michelle Hofstetter, CPA, CGMA – Chief Financial Officer

Telephone: 718-975-6605

Email: mhofstetter@palmcoenergy.com

Ms. Hofstetter recently joined PALMco as Chief Financial Officer of the various PALMco entities. In that capacity, Ms. Hofstetter directs and oversees PALMco's Accounting Department and is responsible for all financial matters of the organization. She also plays a critical role as a member of the executive team where she advises management and provides strategic direction. Prior to joining PALMco, Ms. Hofstetter spent over 20 years working in various financial executive management positions across several industries including healthcare, IT, telecommunications, advertising, and professional services. She also spent 3 years working in public accounting. Ms. Hofstetter holds a Bachelor of Science Degree in Accounting from The College of Staten Island (CUNY). She is a New York State licensed Certified Public Accountant and holds a CGMA designation.

Robert ("Bob") Blake – Vice President of Operations

Telephone: 718-696-0131

Email: bblake@palmcoenergy.com

Mr. Blake began working for PALMco as a consultant in 2015 and joined PALMco full-time in 2016 as Vice President of Operations of PALMco and its various affiliates. In that capacity, Mr. Blake oversees the operation of the business of the PALMco, including market entries and strategies, billing system implementation and oversight, implementation and customer data migrations, and sales and marketing compliance. Mr. Blake has over 36 years' experience in the energy industry, including 19 years working at retail energy suppliers (Xoom Energy, MX Energy,

United Energy, Connectiv Energy) and 18 years working at a regulated utility company (United Illuminating, a Connecticut electric utility company). During this time, Mr. Blake served in a wide variety of roles related to customer operations, regulatory affairs, and product development. Mr. Blake has also served on professional boards and organizations, including the ISO New England (NEPOOL) Interruptible Loads Task Force. Mr. Blake holds an MBA from the University of New Haven and a Bachelor of Science in Mechanical Engineering from Worcester Polytechnic Institute.

Adam Bashe – Chief Vice President of Business Development and Chief Sales Officer

Telephone: 718-696-0129

Email: abashe@palmcoenergy.com

Mr. Bashe began joined PALMco in his current position in 2016. In his capacity as Chief Sales Officer, Mr. Bashe is responsible for the assessment, hiring, training, oversight, and monitoring of sales vendor relationships. Prior to joining PALMco, Mr. Bashe spent over 26 years cultivating business strategies and opportunities and leading product development across a wide array of industries. Most recently, Mr. Bashe has led business development initiatives at several retail energy suppliers, both in-house (Direct Energy) and as an external consultant (Aspirity Holding, Town Square Energy). Mr. Bashe holds a Bachelor of Science degree in Economics from Boston University.

Byron Farnsworth ("Barney") – Vice President of Supply and Scheduling

Telephone: 718-696-0121

Email: bfarnsworth@palmcoenergy.com

Mr. Farnsworth joined PALMco in his current position in 2016. In his capacity as Vice President of Supply and Scheduling, Mr. Farnsworth is responsible for procuring electric and natural gas supply, hedging supply of electricity and natural gas to create fixed price products, and scheduling the load of electricity and natural gas supply in compliance with regulatory commission and utility company rules for delivery to customers. Mr. Farnsworth's responsibilities also include forecasting PALMco's delivery requirements and managing the company's risk, ensuring compliance with applicable environmental and renewable energy standards, managing PALMco's relationships with wholesale electricity and natural gas suppliers, and developing and implementing electricity and natural gas pricing models. Mr. Farnsworth has over 29 years in the energy industry, including over 10 years at regulated utility companies (New York State Electric & Gas, Rochester Gas and Electric) and over 19 years at deregulated energy supply companies (Your Energy Holdings, MX Energy, Energetix/NYSEG Solutions). Mr. Farnsworth has experience working with many utilities and independent system operators, including PJM. Mr. Farnsworth holds a Bachelor of Science Degree in Electric/Mechanical Engineering and a Master of Business Administration from the Rochester Institute of Technology.

Jennifer Coleman – Regulatory Manager

Telephone: 718-975-9018

Email: jcoleman@palmcoenergy.com

Ms. Coleman recently joined PALMco in 2017. In her capacity as Regulatory Manager, Ms. Coleman is responsible for providing regulatory guidance and promoting overall regulatory compliance, as well as, monitoring legal and regulatory developments in the state, submitting filings, and attending commission stakeholder workshops. Ms. Coleman holds a Juris Doctor from Appalachian School of Law and a Bachelor of the Arts in Legal Studies and Political Science from St. John Fisher College.

Stephen Schemitsch – Sales Channel Manager

Telephone: 718-975-4235

Email: sschemitsch@palmcoenergy.com

Mr. Schemitsch joined PALMco in his current position in 2016. In his capacity as Sales Channel Manager, Mr. Schemitsch serves as a liaison among PALMco's Sales Department, Compliance Department, and external sales vendors to ensure all agents representing PALMco do so in compliance with internal policies and procedures and the applicable laws, regulations. Mr. Schemitsch has over 20 years' experience in a variety of sales positions, including more than 11 years' experience in the sale of retail energy service (IDT Energy, Sperian Energy, Gateway/Direct Energy Services, Constellation NewEnergy, Econnergy Energy) and more than 8 years' experience in the sale of telecommunications services. In these positions, Mr. Schemitsch has developed a wide range of products and sales strategies and has overseen diverse marketing campaigns involving both internal resources and independent contractors.

Thomas Sheehy– Compliance Officer

Telephone: 718-975-6601

Email: tsheehy@palmcoenergy.com

Mr. Sheehy has been working with PALMco since December 2011. He currently serves as the Compliance Officer for PALMco, responding to customer complaints, developing training materials for agents, and assisting in regulatory-compliance matters. Mr. Sheehy holds a Bachelors in English Literature from Ohio University.

FILE

The Public Utilities Commission of Ohio
Ohio Competitive Retail Natural Gas Marketer Certificate
Renewal

Issued pursuant to Case Number(s):
10-0138-GA-CRS

is
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:
10-180G(5)

Granted to:
PALMco Energy Ohio, LLC

Whose office or principal place of business is located at:
8751 18th Avenue, Brooklyn, NY 11214

And is hereby certified to provide:
Retail Natural Gas Marketer Services

within the state of Ohio, for a two-year period.

Certification Effective:
February 14, 2018 through February 14, 2020

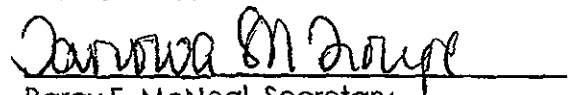
The certification of Ohio competitive retail natural gas marketers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio
Dated: **February 22, 2018**

By Order of
The Public Utilities Commission of Ohio


Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Susan Patterson, Acting Secretary
Beverly Hoskinson, Acting Secretary

Form No. CRNGS/CRS/R-06

This is to certify that the images appearing are an accurate and complete reproduction of a scan file document delivered in the regular course of business.
Technician Am Date Processed 2/22/18

CRNGS AUTOMATIC CASE ACTION FORM

Date: **2/21/18**

Case Number: **10-0138-GA-CRS**

Company Name and Company Name d/b/a: **PALMco Energy Ohio, LLC**

Company Address: **8751 18th Avenue**

Company City/State/Zip: **Brooklyn, NY 11214**

Regulatory Contact: **Jennifer Coleman**

Phone: **718-851-6655 ext. 8**

Email: **Regulatory@palmcoenergy.com**

Address: **8751 18th Avenue**

City/State/Zip: **Brooklyn, NY 11214**

☒ Renewal

Action Needed:

☐ Issue Certificate Number: _____ to: _____
Effective Date of Certificate: _____ Certificate Expires: _____

☒ Renew Certificate Number from: **10-180G(4)** to: **10-180G(5)**
Effective Date of Certificate: **February 14, 2018** Certificate Expires: **February 14, 2020**

☒ Certified To Provide the Following Services:

- ☐ Retail Natural Gas Aggregator
- ☐ Retail Natural Gas Broker
- ☒ Retail Natural Gas Supplier/Marketer
- ☐ Natural Gas Governmental Aggregator

☐ Revise Certificate Number: _____ to (check all applicable):

- ☐ Reflect name change from: _____ to _____
- ☐ Reflect address change from: _____ to _____
- ☐ Correct Administrative Error:
- ☐ Reflect Change of Ownership to: _____

☐ Cancel Certificate Number:

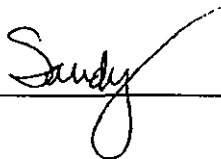
☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 10-0138-GA-CRS
CASE DESCRIPTION: PALMCO ENERGY OH LLC
DATE OF SERVICE: 2/21/2018
DOCUMENT SIGNED ON: 2/22/18

Sign Here: _____

**APPLICANT****PARTY OF RECORD**

PALMCO ENERGY OH LLC MEMBER

JENNIFER COLEMAN

8751 18 AVENUE

BROOKLYN, NY 11214

Phone: 718-851-6655

Email: ACCOUNTING@palmcoenergy.com

ATTORNEY

METZGER, PETER M. ATTORNEY AT LAW

CULLEN AND DYKMAN LLP

44 WALL STREET

NEW YORK, NY 10005

Phone: 212-510-2273

Fax: 212-742-8260

ATTORNEY**PARTY OF RECORD**

none

*Coleman, Jennifer

PALMco

8751 18th Avenue

Brooklyn, NY 11214

Phone: (718) 975-9018

Email: bdudas@palmcoenergy.com

ATTORNEY

none

*Metzger, Peter M

Cullen and Dykman

44 Wall Street

New York, NY 10005

Phone: 212-510-2273

Fax: 212-742-8260

Email: pmetzger@culldyk.com

none

*Miller, Vesta R

Public Utilities Commission of Ohio

180 East Broad Street

Columbus, OH 43215

Phone: 614-466-7702

2/21/2018

Service Notice For Case: 10-0138-GA-CRS

Email: Vesta.Miller@puc.state.oh.us

none

*Coleman, Jennifer

PALMco

8751 18th Avenue

Brooklyn, NY 11214

Phone: (718) 975-9018

Email: bdudas@palmcoenergy.com



PALMco Energy
8751 18th Avenue
Brooklyn, NY 11214

PalmcoEnergy.com
CustomerService@PalmcoEnergy.com
1 (877) 726 5862

April 26, 2018

Via Electronic Filing

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

**Re: PALMco Energy OH, LLC
Certificate No. 10-180-G(5)
Fictitious Name Notification**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC ("PALMco") is writing to inform PUCO of an addition to a fictitious name, Indra Energy, to its license application. A copy of PALMco's State of Ohio Certificate is attached for your convenience.

PALMco plans to begin marketing with its fictitious name on or about the Summer of 2018. Upon marketing under Indra Energy, PALMco will update its license application accordingly with any applicable contact information including but not limited to website information and email addresses.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman". The signature is written in a cursive, flowing style.

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Energy OH, LLC



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	CERT	COPY
04/13/2018	201810203032	FICTITIOUS NAME REGISTRATION (NFO)	39.00	0.00	0.00	0.00

Receipt

This is not a bill. Please do not remit payment.

PALMCO ENERGY OH LLC
JENNIFER COLEMAN
8751 18TH AVENUE
BROOKLYN, OH 11214

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, Jon Husted
4161882

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

INDRA ENERGY

and, that said business records show the filing and recording of:

Document(s)

FICTITIOUS NAME REGISTRATION

Effective Date: 04/02/2018

Document No(s):

201810203032

Expiration Date: 04/02/2023

PALMCO ENERGY OH LLC
8751 18TH AVENUE
BROOKLYN, OH 11214



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio this
13th day of April, A.D. 2018.

Jon Husted
Ohio Secretary of State

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/26/2018 6:30:29 PM

in

Case No(s). 10-0138-GA-CRS

Summary: Report Fictitious Name Notification electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC

The Public Utilities Commission of Ohio
Ohio Competitive Retail Natural Gas Marketer Certificate
Revised Renewal

Issued pursuant to Case Number(s):

10-0138-GA-CRS

is

Ohio Competitive Retail Natural Gas Marketer Certificate Number:

10-180G(5)

Granted to:

PALMco Energy OH, LLC dba Indra Energy

Whose office or principal place of business is located at:

8751 18th Avenue, Brooklyn, NY 11214

And is hereby certified to provide:

Retail Natural Gas Marketer Services

within the state of Ohio, for a two-year period.

Certification Effective:

February 14, 2018 through February 14, 2020

The certification of Ohio competitive retail natural gas marketers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.


This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio

Dated: May 2, 2018

By Order of
The Public Utilities Commission of Ohio


Barcy F. McNeal, Secretary
Tanowd M. Troupe, Acting Secretary
Susan Patterson, Acting Secretary
Beverly Hoskinson, Acting Secretary

Form No. CRNGS/CRS/R-06 This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician mm Date Processed 05/02/18

CRNGS AUTOMATIC CASE ACTION FORM

Date: **5/2/2018**

Case Number: **10-0138-GA-CRS**

Company Name and Company Name d/b/a: **PALMco**

Company Address: **8751 18th Ave**

Company City/State/Zip: **Brooklyn, NY 11214**

Regulatory Contact: **Jennifer Coleman**

Phone: **718-975-9018**

Email: **regulatory@palmcoenergy.com**

Address: **8751 18th Avenue**

City/State/Zip: **Brooklyn, NY 11214**

☐ Renewal

Action Needed:

☐ Issue Certificate Number: _____ to: _____
Effective Date of Certificate: _____ Certificate Expires: _____

☐ Renew Certificate Number from: _____ to: _____
Effective Date of Certificate: _____ Certificate Expires: _____

☐ Certified To Provide the Following Services:

- ☐ Retail Natural Gas Aggregator
- ☐ Retail Natural Gas Broker
- ☐ Retail Natural Gas Supplier/Marketer
- ☐ Natural Gas Governmental Aggregator

☒ Revise Certificate Number: **10-180G(5)** to (check all applicable):

☒ Reflect name change from: **PALMco Energy OH, LLC** to **PALMco Energy OH, LLC dba Indra Energy**

☐ Reflect address change from: _____ to _____

☐ Correct Administrative Error:

☐ Reflect Change of Ownership to: _____

☐ Cancel Certificate Number:

☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 10-0138-GA-CRS
CASE DESCRIPTION: PALMCO ENERGY OH LLC dba INDRA ENERGY
DATE OF SERVICE: 5/2/2018
DOCUMENT SIGNED ON: 5/2/2018

Sign Here: _____



APPLICANT

PARTY OF RECORD

PALMCO ENERGY OH LLC , dba INDRA ENERGY
JENNIFER COLEMAN
8751 18TH AVENUE
BROOKLYN,NY 11214
Phone:718-851-6655

Email:REGULATORY@palmcoenergy.com

ATTORNEY

METZGER, PETER M. ATTORNEY AT LAW
CULLEN AND DYKMAN LLP
44 WALL STREET
NEW YORK, NY 10005
Phone:212-510-2273
Fax:212-742-8260

ATTORNEY

PARTY OF RECORD

none

*Coleman, Jennifer
PALMco
8751 18th Avenue
Brooklyn,NY 11214
Phone:(718)975-9018
Email:bdudas@palmcoenergy.com

ATTORNEY

none

*Metzger, Peter M
Cullen and Dykman
44 Wall Street
New York,NY 10005
Phone:212-510-2273
Fax:212-742-8260
Email:pmetzger@culldyk.com

none

*Miller, Vesta R
Public Utilities Commission of Ohio
180 East Broad Street
Columbus,OH 43215
Phone:614-466-7702

5/2/2018

Service Notice For Case: 10-0138-GA-CRS

Email: Vesta.Miller@puc.state.oh.us

none

*Coleman, Jennifer

PALMco

8751 18th Avenue

Brooklyn, NY 11214

Phone: (718) 975-9018

Email: bdudas@palmcoenergy.com



PALMco Energy
8751 18th Avenue
Brooklyn, NY 11214

PalmcoEnergy.com
CustomerService@PalmcoEnergy.com
1 (877) 726 5862

May 24, 2018

Via Electronic Filing

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

**Re: PALMco Energy OH, LLC
Certificate No. 10-180-G(5)
Updated Operations Information, Exhibit D-1**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC ("PALMco") is writing to inform PUCO that PALMco no longer uses Quantum Gas & Power Services, Ltd. to assist in its natural gas operations. In addition to PALMco's in house personnel, PALMco has a contractual relationship with GP Energy Management, LLC to assist with its natural gas operations.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman". The signature is written in a cursive, flowing style.

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Energy OH, LLC

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/24/2018 12:46:18 PM

in

Case No(s). 10-0138-GA-CRS

Summary: Notice Updated Operations Information electronically filed by Jennifer Coleman
on behalf of PALMco Energy OH, LLC



PALMco Energy
8751 18th Avenue
Brooklyn, NY 11214

PalmcoEnergy.com
CustomerService@PalmcoEnergy.com
1 (877) 726 5862

July 5, 2018

Via Electronic Filing

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

**Re: PALMco Energy OH, LLC
Certificate No. 10-180-G(5)
Updated Operations Information- Exhibits A-14, D-1, D-2, & D-3**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC ("PALMco") is writing to inform PUCO of the following updates to its renewal license application:

Exhibits A-14, D-1, D-2, & D-3

Bob Blake is no longer the Vice President of Operations. Jeremy Schupp is now the Chief Operating Officer. Mr. Schupp has a proven record of management and leadership in energy. Attached is a copy of Mr. Schupp's resume. Mr. Schupp has the following contact information:

Email: Jschupp@palmcoenergy.com
Address: 8751 18th Avenue
Brooklyn, NY 11214
Phone: 718.696.0131
Fax: 718.851.2427

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman". The signature is fluid and cursive.

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Energy OH, LLC

JEREMY E. SCHUPP

Professional Experience

Agera Energy, LLC
Chief Executive Officer

Briarcliff Manor, NY
2016 - 2018

Retail energy marketer serving 1.3 million contracted residential customer equivalents in 16 U.S. states.

ampCNG, LLC - a New Frontiers Holdings company
Chief Operating Officer

Chicago, IL
2016

Leading U.S. compressed natural gas fueling station operator and renewable natural gas project developer.

Aspirity Holdings LLC
Vice President, Chief Operating Officer

Minneapolis, MN
2015 - 2016

Start-up retail energy marketer, and home energy services provider, serving consumers in 4 U.S. states.

energy.me, llc - a New Frontiers Holdings company (acquired by Agera Energy)
President & Chief Executive Officer

Chicago, IL
2013 - 2015

Retail energy marketer serving more than 250,000 residential customer equivalents in 7 U.S. states.

INTL FCStone Inc.
Director of Consulting - Energy

Chicago, IL
2012 - 2013

Global supplier of customized price risk management services to commodity producers and consumers with annual operating revenue of more than \$450 million.

Nestle USA
Group Manager – Commodity Procurement
Purchasing Manager - Energy

Glendale, CA
2008 - 2012
2002 - 2006

The world's leading Nutrition, Health and Wellness company with over \$100 billion in annual sales.

Risk Management Incorporated
Director of Consulting

Chicago, IL
2006 - 2008

Provider of customized price risk management and procurement services to electricity, natural gas and diesel fuel consumers across the US and Canada.

PG&E National Energy Group
Real Time Electricity Trader

Bethesda, MD
2001 - 2002

Developer, builder, owner and operator of electric generating and natural gas pipeline facilities.

Cargill, Inc.
Grain Merchandiser

Wayzata, MN
1998 - 2001

Global leader in the delivery of food, agriculture, and energy with annual revenue of over \$120 billion.

Education

Purdue University, School of Agriculture
Bachelor of Science, Agricultural Economics

West Lafayette IN
1997

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/5/2018 10:42:02 AM

in

Case No(s). 10-0138-GA-CRS

Summary: Correspondence Updated Operations Information electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC



PALMco Energy
8751 18th Avenue
Brooklyn, NY 11214

PalmcoEnergy.com
CustomerService@PalmcoEnergy.com
1 (877) 726 5862

August 27, 2018

Via Electronic Filing

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

**Re: PALMco Energy OH, LLC d/b/a Indra Energy
Certificate No. 10-180-G(5)
Updated Operations Information- Exhibits A-14, D-1, D-2, & D-3**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC d/b/a Indra Energy ("PALMco") is writing to inform PUCO of the following update to its renewal license application:

Exhibits A-14, D-1, D-2, & D-3

Byron Farnsworth is no longer the Vice President of Supply and Scheduling. Please contact PALMco's Chief Operating Officer, Jeremy Schupp, for any questions related to Supply and Scheduling.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman". The signature is written in a cursive, flowing style.

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Energy OH, LLC d/b/a Indra Energy

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/27/2018 11:05:47 AM

in

Case No(s). 10-0138-GA-CRS

Summary: Notification Operations Update electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC



Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

October 29, 2018

VIA ELECTRONIC FILING

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

**Re: PALMco Energy OH, LLC d/b/a Indra Energy
Certificate No. 10-180-G(5)
Material Change Notification**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following updates to its license renewal application:

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

Name: Indra Energy
Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Phone: (888) 504-6372
Website URL is updated to: www.IndraEnergy.com

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

Add Indra Energy

A-5 Contact person for regulatory or emergency matters (Contact Remains the same, however the email address has been updated):

Jennifer Coleman
Regulatory Manager
8751 18th Avenue
Brooklyn, NY 11214
718-975-9018 (p)
718-851-2427 (f)
Regulatory@IndraEnergy.com



Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

A-6 Contact person for Commission Staff use in investigating customer complaints (Contact Remains the same, however the email address has been updated):

Thomas Sheehy
Compliance Officer
8751 18th Avenue
Brooklyn, NY 11214
718-975-6601 (p)
718-851-2427 (f)
Compliance@IndraEnergy.com

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

Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Toll Free Phone: (888) 504-6372
Email: CustomerCare@IndraEnergy.com

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or Jcoleman@IndraEnergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman".

Jennifer Coleman
Regulatory Manager
On Behalf of Indra Energy

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/29/2018 9:08:57 AM

in

Case No(s). 10-0138-GA-CRS

Summary: Report Updated License Information electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC



Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

November 9, 2018

VIA ELECTRONIC FILING

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

**Re: PALMco Energy OH, LLC d/b/a Indra Energy
Certificate No. 10-180-G(5)
Material Change Notification- Updated Regulatory Contact**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following update to its license renewal application:

A-5 Contact person for regulatory or emergency matters

Contact Name: Briana Ashiotes
Title: Corporate and Regulatory Counsel
Address: 8751 18th Avenue, Brooklyn, NY 11214
Telephone: 718.696.0120
Fax: 718.851.2427
Email: Regulatory@IndraEnergy.com

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@IndraEnergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Coleman". The signature is fluid and cursive, with the first name "Jennifer" written in a larger, more prominent script than the last name "Coleman".

Jennifer Coleman
Regulatory Manager
On Behalf of Indra Energy

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/9/2018 9:29:32 AM

in

Case No(s). 10-0138-GA-CRS

Summary: Report Updated Regulatory Contact electronically filed by Jennifer Coleman on behalf of PALMco Energy OH, LLC

FILE



10-138-GA-CRS

Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

March 14, 2019

VIA FED-EX

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

Re: PALMco Energy OH, LLC d/b/a Indra Energy
Certificate No. 10-180-G(5)
Updated Customer Complaint Contact

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following update to its license renewal application:

A-6 Contact person for Customer Complaints

Contact Name: Orpheus Craigie
Title: Compliance Officer
Address: 1515 Market Street, Suite 1200
Telephone: 718.975.6611
Fax: 718.851.2427
Email: Compliance@indraenergy.com

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or Cgelo@indraenergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Christina Gelo".

Christina Gelo
Regulatory Specialist

PUCO

2019 MAR 15 PM 2:08

RECEIVED-SOCKETING DIV

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician UWV Date Processed 3/15/19



Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA 19102

IndraEnergy.com
CustomerCare@IndraEnergy.com
1 (888) 504-6372
(888) 504-6372

May 1st, 2019

VIA FED-EX

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

**Re: PALMco Energy OH, LLC d/b/a Indra Energy
Certificate No. 10-180-G(5)
License Material Change**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-27-11, PALMco Energy OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following update to its license renewal application:

A-5 Contact person for Regulatory or Emergency Matters:

Contact Name: Christina Gelo
Title: Regulatory Specialist
Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Telephone: 718.975.9018
Fax: 718.851.2427
Email: Regulatory@indraenergy.com

A-6 Contact person for Customer Complaints:

Contact Name: Keenia Joseph
Title: Director of Compliance
Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Telephone: 718.975.6611
Fax: 718.851.2427
Email: Compliance@indraenergy.com

A-14 Principal Officers, Directors & Partners:

Keenia Joseph- Director of Compliance

Keenia Joseph is the Director of Compliance for Indra Energy with 13 years of experience managing regulatory affairs, reporting, compliance, new market entry, federal and state legislative actions, and regulatory and Attorney General proceedings. During her years in the industry, Ms. Joseph's managed compliance responsibilities for numerous industry legislative and regulatory rule changes, multiple sales channels and relevant materials, including the vetting

of vendors, review and approval of sales materials, including, but not limited to scripts, training materials, and disciplinary policies. Ms. Joseph's experiences encompass all states where gas and electric retail energy is deregulated and/or restructured with tenure at companies serving customers behind over 62 utilities in US and Canada. Prior to her current role, Ms. Joseph served as Director of Regulatory Affairs at North American Power and Gas, before and after the sale of the company to Calpine Corporation. Ms. Joseph also spent over 5 years at MXenergy Inc., a Constellation Energy Company. Ms. Joseph earned her B.A. in Corporate Communications from Baruch College and a Certificate of Paralegal Studies from Mercy College.

Penny Guida – Sr. Director of Operations

Ms. Guida has twenty-two years of energy services company experience including customer and systems management, in depth understanding of utility and regulatory requirements, and high-volume process management and control experience. She has recently joined Indra business as the Sr. Director of Operations.

Evelyne Tang- Financial & Data Analyst:

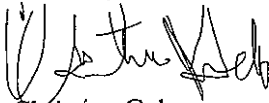
Ms. Tang received her bachelor's degree in Mathematics and Computer Science at St. John's University. Ms. Tang started out in the energy industry approximately 3 years ago as an operations analyst and then progressed to pricing analyst. She has knowledge of industry operations and in depth understanding of the components of the supply side of the market. Additionally, Ms. Tang has experience in the solar industry where she began as an administrative assistant and then promoted to project installations manager.

Kateri Guevara-Sales Operation Manger:

Ms. Guevara is an operations and knowledge management professional with over eight years' experience in deregulated northeast residential markets. Particular areas of strengths include root-cause analysis, problem solving, knowledge and content management, and sales operations.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or Cgelo@indraenergy.com.

Sincerely,



Christina Gelo
Regulatory Specialist

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/1/2019 3:40:59 PM

in

Case No(s). 10-0138-GA-CRS

Summary: Notice of Material Change electronically filed by Ms. Rebekah J. Glover on behalf of PALMco Energy OH, LLC d/b/a Indra Energy

RECEIVED-DOCKETING DIV

2019 OCT -4 PM 2:01

CASE NUMBER:	10-0139-EL-CRS PUCO
CASE DESCRIPTION:	PALMCO POWER OH LLC dba INDRA ENERGY
DOCUMENT SIGNED ON:	9/17/2019
DATE OF SERVICE:	

05/06/2019	Revised Renewal Certificate # 10-199E(5) issued.
05/01/2019	Notice of Material Change electronically filed by Ms. Rebekah J. Glover on behalf of PALMco Power OH, LLC d/b/a Indra Energy.
04/16/2019	Staff letter requesting a Commission Ordered Investigation filed by R. Fadley on behalf of PUCO Staff.
03/15/2019	Notice of Material Change: Contact Person for Customer Complaints filed by C. Gelo on behalf of PALMco Power OH, LLC dba Indra Energy.
11/09/2018	Notice of material change - Updated Regulatory Contact electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC.
10/29/2018	Notice of Material Change updating License Information electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC.
08/27/2018	Notice Operations Update electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC.
07/05/2018	Updated Operations Information electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC.
05/02/2018	Revised Renewal Certificate No. 10-199E (5) issued.
05/02/2018	Renewal Certificate No. 10-199E (4) issued.
04/30/2018	Confidential Document Target for Exhibit C-3 filed by J. Coleman on behalf of Palmco Power OH LLC. (36 pages)
04/27/2018	Notice of Material Change for Fictitious Name electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC.
03/09/2018	Renewal Certificate No.10-199E (5) issued.
01/18/2018	Confidential Document Target for Exhibits C-3 and C-5 filed by J. Coleman on behalf of PALMco Power OH, LLC. (74 pages)
01/18/2018	Renewal application of PALMco Power OH, LLC for certification as a retail generation provider and power marketer, filed by Jennifer Coleman.
08/28/2017	Correspondence for CT Notification for PALMco Power OH, LLC electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC.
06/12/2017	Notice of Updated Regulatory Contact electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC.
04/04/2017	Notice of Updated Contact Information electronically filed by Briana Dudas on behalf of PALMco Power OH, LLC
12/22/2016	Notice of Withdrawal of Counsel electronically filed by Dina L Vespia on behalf of Cullen and Dykman LLP.
09/02/2016	Revised Certificate No.10-199E (4) issued.

08/25/2016	Notification Material Change of Business Address electronically filed by Briana Dudas on behalf of PALMco Power OH, LLC.
03/10/2016	Renewal Certificate # 10-199E (4) issued.
02/05/2016	Renewal application for Retail generation providers and power marketers of Palmco Power OH, LLC.
02/05/2016	Correspondence stating the filing of Renewal Application, Motion for Protective Order and Memorandum in support as well as sealed copies of Confidential filed on behalf of Palmco Power OH, LLC by D. Vespia.
02/05/2016	Motion for Protective order and Memorandum in Support filed by Dina L. Vespia on behalf of Palmco Power OH, LLC.
02/05/2016	Confidential treatment of Document Exhibit C-3 & C-5 filed by Dina Vespia on behalf of Palmco Power OH, LLC. (pg ct 78)
05/02/2014	Confidential document release: Exhibit C-4 originally filed on 2/5/10 .
05/01/2014	Service Notice
05/01/2014	Attorney Examiner Entry ordering that the motions for a protective order and for extension of prior protective orders filed by the Palmco Companies be granted with regard to confidential exhibits C-3, C-4, and C-5 of the companies' renewal applications for certification as a competitive retail natural gas and electric marketer. The Entry directs the Commission's docketing division to keep exhibits C-3, C-4, and C-5 under seal for a period of 24 months. The Entry also directs the Commission's docketing division to release exhibits covered by expired protective orders into the public record; electronically filed by Vesta R Miller on behalf of Kerry K. Sheets, Attorney Examiner, Public Utilities Commission of Ohio
03/11/2014	Renewal Certificate 10-199E(3) issued.
01/27/2014	Amended Exhibit A-16 filed by D. Vespia on behalf of Palmco Power OH, LLC.
01/27/2014	Confidential document target: Exhibit C-4 and C-5, filed by D. Vespia on behalf of Palmco Power Oh, LLC. (17 pages)
01/21/2014	Confidential document target: Exhibits C-3, C-4 & C-5 filed by D. Vespia on behalf of Palmco Power Ohio, LLC. (69 pages)
01/21/2014	Motion for protective order, memorandum in support and extension of prior protective order filed by D. Vespia on behalf of Palmco Power Ohio, LLC.
01/21/2014	Renewal application of Palmco Power Ohio, LLC for certification for retail generation providers and power marketers filed by Peter Metzger.
01/16/2014	Motion for Permission to Appear Pro Hac Vice electronically filed by Dina L Vespia on behalf of Palmco Power OH, LLC.
04/20/2012	Service Notice
04/20/2012	Entry granting motion for admission pro hac vice in accordance with Finding (4) and the extension of protective orders for 24 months ending on February 13, 2014, in case 10-138, and March 8, 2014, in case 10-139. (KKS)
03/12/2012	Certificate 10-199E (2) issued.
01/19/2012	Amended Exhibit C-5 filed by P. Metzger on behalf of Palmco Power Ohio, LLC.
01/18/2012	Letter regarding Amended Ex C-5, p.1 of Renewal Application electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC.
01/18/2012	Certificate pro hac vice of Peter Metzger filed by P. Metzger on behalf of Palmco Energy, Ohio, LLC.
01/17/2012	Certificate Pro Hac Vice Registration Certificate - Peter Metzger electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC
01/17/2012	Cover Letter to Filing of Pro Hac Vice Registration Certificate electronically filed by Peter M. Metzger on behalf of Palmco Power OH, LLC.
01/13/2012	Motion for permission to appear Pro Hac Vice filed by Peter M. Metzger on behalf of Palmco Power OH, LLC.
01/13/2012	Confidential treatment of document: financials filed by P. Metzger on behalf of Palmco Power OH LLC.
01/13/2012	Renewal application for retail generation providers and power marketers filed by Peter M. Metzger on

	behalf of Palmco Power OH, LLC
<u>01/13/2012</u>	Motion for protective order and extension for prior protective order and memorandum in support of motion for protective order filed by Peter M. Metzger on behalf of Palmco Power OH, LLC.
<u>01/12/2012</u>	Affidavit for Pro Hac Vice Registration electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC
<u>01/12/2012</u>	Motion for Permission to Appear Pro Hac Vice electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC
<u>01/12/2012</u>	Memorandum in Support electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC.
<u>01/12/2012</u>	Motion for Protective Order and Extension of Prior Protective Order electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC.
<u>01/12/2012</u>	In the matter of the Application for Renewal Certification as Competitive Retail Power Supplier electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC.
<u>01/12/2012</u>	Correspondence Cover Letter to Application for Renewal Certification electronically filed by Peter M Metzger on behalf of Palmco Power OH, LLC
<u>04/12/2010</u>	Service Notice
<u>04/12/2010</u>	Entry granting motion for protective order filed as part of Exhibit C-4 by Palmco Power and that the Commission's docketing division maintain the Exhibit C-4 under seal for a period of 24 months, ending on March 8, 2012. (HPG)
<u>03/10/2010</u>	Certificate 10-199E(1) issued.
<u>03/02/2010</u>	Execute guarantee from Columbia Utilities, LLC and Columbia Utilities Power, LLC filed by R. Palmese on behalf of Palmco Power, Ohio, LLC. (original)
<u>03/02/2010</u>	Letter requesting Peter M. Metzger be added as a party of record filed by P. Metzger on behalf of Palmco Power Ohio, LLC.
<u>03/01/2010</u>	Executed guarantee from Columbia Utilities, LLC and Columbia Utilities Power OH, LLC filed by R. Palmese on behalf of Palmco Power OH, LLC. (FAX)
<u>03/01/2010</u>	Letter requesting Peter M Metzger be added as a party of record. (FAX)
<u>02/05/2010</u>	Confidential document target for Exhibit C-4 of section C-4, financial statements, filed by P. Metzger on behalf of Palmco Power OH, LLC.
<u>02/05/2010</u>	Motion for protective order and memorandum in support filed by P. Metzger on behalf of Palmco Power OH, LLC.
<u>02/05/2010</u>	In the matter of the application of Palmco Power OH, LLC for certification as a Retail Generation Provider and Power Marketer.



10-139-EL-CRS 46
RECEIVED-DOCKETING DIV

2018 JAN 18 PM 3:53

PUCO

PALMco Energy
8751 18th Avenue
Brooklyn, NY 11214

w: PalmcoEnergy.com

e: CustomerService@PalmcoEnergy.com

toll free: 1 (877) 726 5862

January 16, 2018

Via FedEx

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

**Re: PALMco Power OH, LLC ("PALMco")
Renewal Certificate Application
Certificate No. 10-139**

To the Public Utilities Commission of Ohio:

Enclosed for filing with Public Utilities Commission of Ohio is an original plus three (3) copies of PALMco Power OH, LLC's Electric Renewal Certificate Application and Exhibits.

Pursuant to Ohio Administrative Code 4901:1-24-08, PALMco respectfully requests its financial statements and forecasted financial statements, attached herein as Exhibit C-3 and C-5, be afforded confidential treatment for a period of six years.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Power OH, LLC

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician LOH Date Processed JAN 18 2018



Renewal Instructions for Retail Electric Generation Providers and Power Marketers

I. Where to File: Applications should be sent to: Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus Ohio 43215-3793.

II. What to File: Applicant must submit one original notarized application signed by a principal officer and three copies including all exhibits, affidavits, and other attachments. All attachments, affidavits, and exhibits should be clearly identified. For example, Exhibit C-10 should be marked "Exhibit C-10 "Corporate Structure." All pages should be numbered and attached in a sequential order.

VERY IMPORTANT: The renewal application must be docketed in the applicant's original EL-CRS case number.

III. Renewal Application Form: The renewal application is available on the Commission's web site, www.puco.ohio.gov or directly from the Commission at: Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus Ohio 43215- 3793.

IV. Confidentiality: An applicant may file financial statements, financial arrangements, and forecasted financial statements under seal. If these exhibits are filed under seal, they will be afforded protective treatment for a period of six years from the date of the certificate for which the information is being provided.

An applicant may file a motion for a protective order for other information not filed under seal per the previous paragraph. If the motion is filed in conformance with rule 4901:1-24-07 of the Administrative Code, it shall be automatically approved on the thirty-first day after the date of filing and the information shall be afforded protective treatment for a period of six years from the date of the certificate for which the information is being provided, unless the commission or an attorney examiner appointed by the commission rules otherwise.

At the expiration of the six-year period provided for in the previous paragraphs, the information will be automatically released into the open record. An applicant wishing to extend a protective order beyond the six-year time period must comply with paragraph (F) of rule 4901-1-24 of the Administrative Code.

V. Commission Process for Approval: An application for renewal shall be made on forms approved and supplied by the Commission. The applicant shall complete the appropriate application renewal form in its entirety and supply all required attachments, affidavits, and evidence of capability specified by the form at the time an application is filed. The Commission renewal process begins when the Commission's Docketing Division receives and time/date stamps the application. An incomplete application may be suspended or rejected. An application that has been suspended as incomplete may cause delay in certification.

The Commission may approve, suspend, or deny a renewal application within 30 days. If the Commission does not act within 30 days, the renewal application is deemed automatically approved on the 31st day after the official filing date. If the Commission suspends the application, the Commission shall notify the applicant of the reasons for such suspension and may direct the applicant to furnish additional information. The Commission shall act to approve or deny a suspended application within 90 days of the date that the application was suspended. Upon Commission approval, the applicant shall receive notification of approval and a numbered certificate that specifies the service(s) for which the applicant is certified and the dates for which the certificate is valid.

Unless otherwise specified by the Commission, a competitive retail electric service provider's certificate is valid for a period of two years, beginning and ending on the dates specified on the certificate. The applicant may renew its certificate in accordance with Rule 4901:1-24-09 of the Ohio Administrative Code.

CRES (competitive retail electric service) providers shall inform the Commission of any material change to the information supplied in a certification application within thirty days of such material change in accordance with Rule 4901:1-24-10 of the Ohio Administrative Code.

VI. Questions: Questions regarding filing procedures should be directed to CRES@puc.state.oh.us

VII. Governing Law: The certification/renewal of competitive retail electric suppliers is governed by Chapter 4901:1-24 of the Ohio Administrative Code, Chapter 4901:1-21 of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.



Original CRS Case Number	Version
10-199-EE-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 type="checkbox"/> Retail Generation Provider | <input checked="" 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 PALMco Power OH, LLC
 Address 8751 18th Avenue, Brooklyn, NY 11214
 PUCO Certificate # and Date Certified 10-199E(4), March 8, 2016
 Telephone # (877) 726-5862 Web site address (if any) PalmcoEnergy.com

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

Legal Name PALMco Power OH, LLC
 Address 8751 18th Avenue, Brooklyn, NY 11214
 Telephone # (877) 726-5862 Web site address (if any) PalmcoEnergy.com

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

PALMco

PALMco Power

A-5 Contact person for regulatory or emergency matters

Name Jennifer Coleman

Title Regulatory Manager

Business address 8751 18th Avenue, Brooklyn, NY 11214

Telephone # (718) 975-9018

Fax # (718) 851-2427

E-mail address Regulatory@PalmcoEnergy.com

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

Name Thomas Sheehy

Title Compliance Officer

Business address 8751 18th Avenue, Brooklyn, NY 11214

Telephone # (718) 975-6601

Fax # (718) 851-2427

E-mail address Compliance@palmcoenergy.com

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

Customer Service address 8751 18th Avenue, Brooklyn, NY 11214

Toll-free Telephone # (877) 726-5862

Fax # (718) 851-2427

E-mail address CustomerService@PalmcoEnergy.

A-8 Applicant's federal employer identification number # 32-0274223

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

☐ Sole Proprietorship

☒ Limited Liability Partnership (LLP)

☐ Corporation

☐ Partnership

☐ Limited Liability Company (LLC)

☐ 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)

Ricardo Managing Member
Signature of Applicant and Title

Sworn and subscribed before me this 16th day of January, 2018
Month Year

Zoila Vega
Signature of official administering oath

Zoila Vega Notary Public
Print Name and Title

My commission expires on 5/30/21



AFFIDAVIT

State of NEW YORK :

_____. ss.
(Town)

County of KINGS :

Robert Palmese

Power

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

He/She is the Managing Member (Office of Affiant) of PALMco Power OH, LLC (Name of Applicant);

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

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

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

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

Rita Palma, Managing Mbr
Signature of Affiant & Title

Sworn and subscribed before me this 16th day of January, 2018
Month Year

Zoila Vega
Signature of official administering oath

Zoila Vega Notary Public
Print Name and Title



My commission expires on 5/30/21

Exhibit A-10
Principal Officers, Directors, & Partners

Robert Palmese, *President/ Managing Member*
8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-851-6655 ext. 8

Michelle Hofstette, *Chief Financial Officer*
8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-975-6605

Robert Blake, *Vice President of Operations*
8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-696-0131

Adam Bashe, *Vice President of Business Development and Chief Sales Officer*
8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-696-0129

Byron Farnsworth, Jr., *Vice President of Supply and Scheduling*
8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-696-0121

Jennifer Coleman, *Regulatory Manager*
8751 18th Avenue
Brooklyn, NY 11214
Telephone: 718-975-9018

Exhibit B-1
Jurisdictions of Operation

PALMco Power OH, LLC (hereinafter "PALMco") is a stand-alone entity, rather than subsidiaries of a corporate parent. The individual members of the Ohio PALMco entity also own, in whole or in part, entities in other jurisdictions that are engaged in the retail sale of electricity and natural gas. The entities are as follows:

Name: Columbia Utilities, LLC (Electric) and Columbia Utilities Power, LLC (Gas)
License Number/ State of Issuance: N/A, New York

Name: PALMco Power CA, LLC (Electric)
License Number/ State of Issuance: ESP NO. 1387/California

Name: PALMco Energy CT, LLC (Gas)
License Number/ State of Issuance: 09-01/ Connecticut

Name: PALMco Power DC, LLC (Electric) and PALMco Energy DC, LLC (Gas)
License Number/ State of Issuance: EA 2016-16/ District of Columbia (Electric) and GA 2016-05/
District of Columbia (Gas)

Name: PALMco Power DE, LLC (Electric)
License Number/ State of Issuance: 16-0929/ Delaware (Electric)

Name: PALMco Power IL, LLC (Electric) and PALMco Energy IL, LLC (Gas)
License Number/ State of Issuance: 12-0269/ Illinois (Electric) and 12-0395/ Illinois (Gas)

Name: PALMco Power MA, LLC (Electric) and PALMco Energy MA, LLC (Gas)
License Number/ State of Issuance: CS-092/ Massachusetts (Electric) and GS-046/
Massachusetts (Gas)

Name: PALMco Power MD, LLC (Electric) and PALMco Energy MD, LLC (Gas)
License Number/ State of Issuance: IR-1804/ Maryland (Electric) and IR-1803/ Maryland (Gas)

Name: PALMco Power NJ, LLC (Electric) and PALMco Energy NJ, LLC (Gas)
License Number/ State of Issuance: ESL-0049/ New Jersey (Electric) and GSL-0033/ New Jersey
(Gas)

Exhibit B-1
Jurisdictions of Operation
(continued)

Name: PALMco Power NY, LLC (Electric) and PALMco Energy NY, LLC (Gas)
License Number/ State of Issuance: N/A, New York

Name: PALMco Energy OH, LLC (Gas)
License Number/ State of Issuance: 10-0138/ Ohio (Gas)

Name: PALMco Power PA, LLC (Electric) and PALMco Energy PA, LLC (Gas)
License Number/ State of Issuance: A-2009-2108338/ Pennsylvania (Electric) and A-2009-2100320/ Pennsylvania (Gas)

Name: PALMco Energy VA, LLC (Gas)
License Number/ State of Issuance: G-49/ Virginia

Exhibit B-2

Experience & Plans

Experience.

Since PALMco's last license renewal application, PALMco has taken several affirmative steps to modify its business practices and procedures. First, PALMco has made significant managerial investments to enhance its capabilities. This includes hiring the following experienced energy industry individuals to conduct oversight and management of essential functions of the business: operations, sales, supply, and regulatory compliance. The addition of a new management team has provided greater control, monitoring and oversight of the business operations and has resulted in significant cultural changes at the company including a comprehensive top-down approach to compliance and regular weekly meetings to identify, discuss, and address issues effectively across departments. There is an ongoing dialogue to implement constant improvements in accordance with best practices in the industry. These individuals, with a summary of their experience and education, are listed in Exhibit D-3.

Plans.

In order to contract with customers, PALMco hires third party vendors to market its services through door-to-door and telesales solicitations. All third party vendors hired by PALMco undergo a training program to ensure compliance with applicable laws and regulations. PALMco also employs a Sales Channel Manager to communicate regularly with vendors for any regulatory updates, agent training concerns, and changes to any marketing materials. In addition, customers may enroll on PALMco's website at <https://palmcoenergy.com/ohio/>.

To ensure compliance and proper authorization of customer accounts, PALMco implemented a new customer relationship management software system ("CRM"). The CRM provides a significant improvement in the areas of sales data retention and organization, management oversight and speed of the quality assurance process, as well as performance reporting of sales vendors, specific sales agents, and quality assurance team members performing reviews. The system facilitates analysis of data and allows for better tracking to enhance oversight and monitoring of sales and marketing activities. The CRM also allows the Compliance and Customer Service Teams to effectively respond to customer complaints and inquiries. To that end, PALMco has an onsite Customer Service Department to respond to any customer communications.

Exhibit B-2
Experience & Plans
(continued)

PALMco does not provide its own billing services to customers. Instead, PALMco has opted to have local electric utilities provide consolidated billing services on its behalf and on behalf of its customers. PALMco has contracted with Energy Services Group for its EDI and customer account billing. Furthermore, PALMco has an internal Billing and Operations Team to communicate, on a daily basis, with utilities and provide billing and transaction analysis.

Exhibit B-3
Disclosure of Liabilities and Investigations

PALMco Power OH, LLC is a stand-alone entity, rather than subsidiaries of a corporate parent. While the below disclosures will not affect PALMco's financial or operational capabilities in Ohio, in the interest of full disclosure, other PALMco entities have had the following investigations:

Illinois

The People of the State of Illinois vs. PALMco Power IL, LLC

On March 9, 2017 the Illinois Attorney General ("IL AG") filed a complaint against PALMco Power IL, LLC under the Consumer Fraud and Deceptive Business Practices Act. On October 11, 2017, PALMco entered into a settlement agreement with the IL AG. PALMco agreed to pay restitution to customers and a voluntary contribution to the Attorney General in the amount of \$20,000.00. PALMco continues to sell retail electricity to customers in the state of Illinois.

Gress v. PALMco Energy IL, LLC

Circuit Court for the 12th Judicial Circuit
Case No. 17MR1477

On May 30, 2017 William Gress and Denise Gress filed a complaint against PALMco Energy IL, LLC under the Illinois Restricted Call Registry Act. The matter is ongoing and PALMco is cooperating with Plaintiffs' counsel.

Connecticut

Application of PALMco Power CT, LLC For An Electric Supplier License – Investigation of Marketing and Enrollment Practices

Connecticut Public Utilities Regulatory Authority ("Authority")
Docket No. 10-01-24RE01

By Decision dated February 25, 2015, the Authority notified PALMco that it opened a docket "to examine PALMco's marketing and enrollment practices, and compliance with record retention requirements and other terms of its supplier license." A joint settlement between all participants was reached and a final decision was entered by the Authority on August 16, 2017. As part of the settlement, PALMco agreed to voluntarily relinquish its electric license in the state of Connecticut for a period of five years.

Exhibit B-3
Disclosure of Liabilities and Investigations
(Continued)

New Jersey

Lougy v. PALMco Power NJ, LLC and PALMco Energy NJ, LLC

Superior Court of New Jersey

Docket No. MER-C-33-14

On May 28, 2014, the New Jersey Attorney General's Office ("NJ AG") filed a complaint against PALMco Power NJ, LLC and PALMco Energy NJ, LLC (collectively "PALMco NJ"), in New Jersey Superior Court. The complaint, which arose out of the 2013-2014 winter Polar Vortex, alleged that PALMco NJ had violated certain New Jersey consumer protection laws and New Jersey Board of Public Utilities' regulations.

On May 23, 2016, PALMco entered into a settlement agreement with the NJ AG. As part of the settlement, PALMco NJ agreed to undertake various remedial measures related to PALMco NJ's marketing materials and practices. PALMco also agreed to pay restitution to customers and a civil penalty in the amount of \$500,000 as a part of the settlement. PALMco continues to sell retail electricity and natural gas to customers in the state of New Jersey.

Pennsylvania

MacLuckie v. PALMco Energy PA, LLC

Pennsylvania Public Utility Commission

Docket No. C-2014-2402558

Palmco Energy PA, LLC ("Palmco PA") received notice from the Pennsylvania Public Utility Commission ("PA PUC") on January 28, 2014 that a complaint was filed by a former customer. An initial decision issued by an Administrative Law Judge ("ALJ") did not find Palmco PA in violation of the PA PUC's regulations and granted Palmco PA's motion to dismiss. In response to filed objections, the dismissal was reversed and the complaint was remanded to the ALJ. By an April 30, 2015 Initial Decision on Remand ("Decision on Remand"), the ALJ found that Palmco PA had violated 52 Pa. Code §§ 62.114 (Standards of Conduct and Disclosure for Licensees) and 111.12 (relating to consumer protection), and ordered Palmco PA to pay a civil penalty of \$2,000. Although Palmco PA strongly disagreed with the Decision on Remand, it chose not to file objections or seek an appeal due to the relatively small amount of the fine imposed when compared to the additional cost it would have incurred to proceed further in this matter. The Decision on Remand was made final by Final Order dated June 30, 2015.

Exhibit B-3
Disclosure of Liabilities and Investigations
(Continued)

New York

In the Matter of Columbia Utilities, LLC and Columbia Utilities Power, LLC

New York State Attorney General's Office
Bureau of Consumer Frauds & Protection
AOD #10-120

On or about January 2009, the New York Attorney General's Office ("NYAGO") commenced a civil investigation into Columbia Utilities, LLC and Columbia Utilities Power, LLC (collectively, "Columbia"). On April 12, 2011, the New York State Attorney General's Office ("NYAGO") concluded its investigation, at which time Columbia and the NYAGO reached a settlement, which involved the payment of restitution to customers and \$200,000 in penalties, fees, and costs and the implementation of certain remedial measures. Columbia continues to sell natural gas and electricity at retail in the State of New York.

Exhibit B-4
Disclosure of Consumer Protection Violations

None.

Exhibit B-5
Disclosure of Certification Denial, Curtailment, Suspension, or Revocation

None.

Exhibit C-1
Annual Reports

PALMco is a privately owned limited liability company. Thus, it is not required to prepare annual reports or any similar documents for its shareholders or owners.

Exhibit C-2
SEC Filings

PALMCo is not required to file with the SEC because it is a *privately owned limited liability company*.

Exhibit C-3
Financial Statements
REDACTED

Due to the confidential and proprietary nature of PALMco's financial statements, the statements have been redacted and filed under confidential seal.

Exhibit C-4
Financial Arrangements

Attached please find current statements from Duke Energy, Dayton Power and Light Company, First Energy Utilities, and American Electric Power ("collectively LDUs") demonstrating PALMco meets the LDUs' collateral requirements.



139 East Fourth
EM740
Cincinnati, Ohio 45202

December 15, 2017

Palmco Power OH, LLC has met the Electric Collateral obligations for Duke Energy Corporation as of December 15, 2017.

Tom Hunt

Duke Energy Corp
Certified Supplier Business Center
Tom.Hunt@Duke-Energy.com





12/20/2017

Palmco Power OH, LLC

8751 18th Avenue

Brooklyn, NY 11214

Dear Supplier:

Palmco Power OH, LLC ("Supplier") has satisfied all credit requirements intended to cover the risk of the Dayton Power and Light Company ("Company") as the default supplier. The amount of security remains commensurate with the financial risks placed on the Company by the Supplier.

Thank you,

A handwritten signature in black ink, appearing to read "Charles Hofmann", written over the printed name.

Charles Hofmann

Credit Manager

The Dayton Power and Light Company



December 13, 2017

PALMco Power OH LLC
Alan Klein – Asst. Controller
8751 18th Avenue
Brooklyn, NY 11214

Re: PALMco Power OH LLC Status with FirstEnergy Ohio Utilities (Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company)

To Whom It May Concern:

PALMco Power OH LLC, a certified competitive retail electric service provider in Ohio, has satisfied and is currently in compliance with our collateral and security requirements for FE OH Utilities (Ohio Edison, Toledo Edison, and Cleveland Electric).

FirstEnergy Corp.

Martin Massie

Name: Martin Massie
Title: Credit Risk Analyst
Phone: 330-315-6894



A unit of American Electric Power

December 14, 2017

PALMco Power OH LLC
8751 18th Avenue
Brooklyn, NY 11214

Re: PALMco Power OH LLC ("CRES Supplier")
CRES Supplier's posted collateral as of December 14, 2017

To CRES Supplier:

In reference to the following specific provisions of Ohio Power Company's Distribution Tariff, namely the fourth paragraph of 31 *Supplier Terms and Conditions of Service*, Paragraph 10 *CRES Provider Credit Requirements* and CRES Supplier's estimated peak summer demand of 7.8 MW, AEP Ohio has undertaken a limited review of posted collateral as of December 14, 2017, and AEP Ohio believes that the CRES Supplier is current with the specifically identified collateral requirements through December 14, 2017.

AEP Ohio is not undertaking a separate review of CRES Supplier's financial wherewithal, nor are we evaluating or taking a position as to whether the CRES Supplier will, on a prospective basis, remain in compliance with the identified collateral requirements or other Tariff requirements. This review was limited to the specific collateral requirements identified above, and does not include a review of whether the CRES Supplier is in compliance with any other Tariff requirements or PUCO rules and regulations binding upon CRES suppliers, and further, does not account for any PJM rebillings or settlements that may occur at a later time.

This letter is effective only as of the date hereof, and we are not assuming any responsibility for updating this letter, nor is AEP Ohio waiving any rights or remedies it may be entitled to under Ohio law, its Tariff or any CRES Supplier agreements. This letter is intended solely for the benefit of the addressees and may not be relied upon by such addressees or any other person or entity for any other purpose.

Sincerely,

A handwritten signature in cursive script, appearing to read "Shilpa Jain".

Shilpa Jain, Principal Analyst – Credit Risk Management

Exhibit C-5
Forecasted Financial Statements
REDACTED

Due to the confidential and proprietary nature of PALMco's forecasted financial statements, the statements have been redacted and filed under confidential seal.

Exhibit C-6
Credit Rating

As neither PALMco nor the other PALMco entities, listed in Exhibit B-1, are publicly traded, and each is privately owned, they do not have a credit rating from Duff & Phelps, Fitch IBCA, Moody's Investors Service, Standard & Poor's, or any similar organization. Please see Exhibit C-7 for PALMco's credit report.

Exhibit C-7
Credit Report

Please see PALMco's attached credit report from Dun and Bradstreet.

This Dun & Bradstreet report is provided for your company's internal review. It may not be used for any other purpose or shared.

Business Information Report

User Id: jgllbride@palmcoenergy.com

Report Printed: Wednesday December 13, 2017 03:15 PM

Business Summary

Company Name: PALMCO POWER OH LLC
 Physical Address: 1350 60th St
 Physical City: Brooklyn
 Physical State: NY
 Physical Zip: 11219
 Telephone: NONE
 Legal structure of the business: Partnership
 Employs: 1
 History: CLEAR
 SIC: 8748
 Line of business: Business consulting services

D-U-N-S Number: 830762667

Additional services to monitor and build your Dun & Bradstreet file are available through Dun & Bradstreet's CreditBuilder service. Good credit is the lifeline of your business. It enables you to obtain funding for things like expansion, capital expenditures, research and development, and staffing. To speak with a Credit Advisor today, call 888-814-1435.

Special Events

2017-08-31

Repeated attempts to identify business activity over multiple years were unsuccessful. Any operating activity for this business at captioned address could not be confirmed. Current whereabouts and full extent of outstanding debt, if any, are unknown.

History

Operations

Description:

SIC & NAICS

SIC:		NAICS:	
87480000	Business consulting, nec	541618	Other Management Consulting Services

Payment Summary

Dun & Bradstreet has not received a sufficient sample of payment experiences to establish a PAYDEX score.

Banking & Finance

Dun & Bradstreet has researched this company and found no information available at this time.

PUBLIC FILINGS

The following Public Filing data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

UCC Filings

Collateral:	All Negotiable instruments and proceeds - All Inventory and proceeds - All Account(s) and proceeds - All Contract rights and proceeds - and OTHERS
Type:	Original
Sec. party:	CITIBANK N A, IRVING, TX
Debtor:	PALMCO POWER OH LLC
Filing number:	QH00139705383
Filed with:	SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH
Date filed:	01/15/2010
Latest Info Received:	01/27/2010
Original UCC filed date:	
Original filing no.:	

Collateral:	
Type:	Continuation
Sec. party:	CITIBANK N A, IRVING, TX
Debtor:	PALMCO POWER OH LLC
Filing number:	20142270073

12/13/2017

Dun & Bradstreet Business Information Report: PALMCO POWER OH LLC

Filed with:

SECRETARY OF STATE/UCC DIVISION, COLUMBUS, OH

Date filed: 08/15/2014
This Dun & Bradstreet report is provided for your company's internal review. It may not be used for any other purpose or shared.

Latest Info Received: 08/18/2014

Original UCC filed date: 01/15/2010

Original filing no.: OH00139705383

There are additional UCC's in Dun & Bradstreet's file on this company available by contacting 1-800-234-3867.

There are additional suits, liens, or judgments in Dun & Bradstreet's file on this company available by contacting.

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

Exhibit C-8
Bankruptcy Information

None.

Exhibit C-9
Merger Information

None.

Exhibit C-10
Corporate Structure

PALMco Power OH, LLC is a stand-alone entity, rather than subsidiaries of a corporate parent. The individual members of the Ohio PALMco entity also own, in whole or in part, entities in other jurisdictions that are engaged in the retail sale of electricity and natural gas. Please see the attached chart listing all the PALMco entities.

Exhibit C-10 Corporate Structure

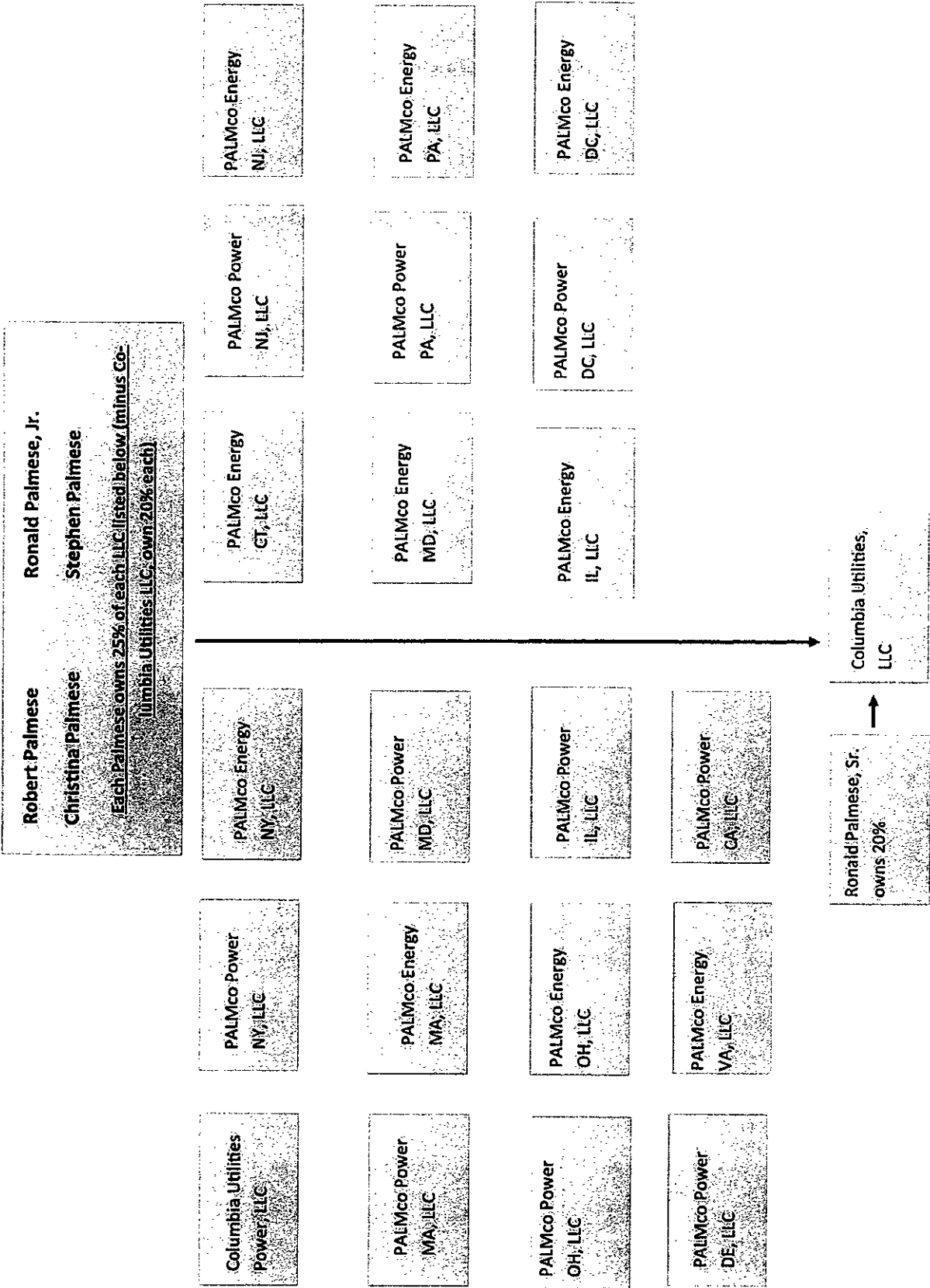


Exhibit D-1 Operations

PALMco in conjunction with its agents, will perform the necessary functions to provide electric competitive services in the state of Ohio. PALMco has a skilled management team to oversee operations within the company. Bryon Farnsworth, as Vice President of Supply and Scheduling, is responsible for the management, scheduling, and purchasing of all electric power within the state of Ohio. In addition to Mr. Farnsworth's skill set, PALMco also has a contractual relationship with GP Energy Management, LLC. In addition, Bob Blake, as Vice President of Operations, oversees a department comprised of twenty-five (25) individuals to assist in billing, compliance, and quality assurance of PALMco's day-to-day operations.

In 2016, between all the PALMco entities, listed in Exhibit B-1, PALMco sold about 309,076,615 kWhs. Currently, between all the PALMco entities, listed in Exhibit B-1, PALMco Power serves about 56,000 customers.

Exhibit D-2
Operations Expertise

Robert Palmese – Managing Member and President

Robert Palmese is the Managing Member of PALMco Energy OH, LLC ("PALMco"). Mr. Palmese has about 16 years' experience selling electric power at retail. He is in charge of the day-to-day operations of the PALMco entities that sell electric power and natural gas at retail in the states of Illinois, New York, New Jersey, Pennsylvania, Maryland, Massachusetts, Delaware, Virginia, and Washington D.C. Mr. Palmese graduated from Georgetown University with a Bachelor of Science degree in Business Administration.

Robert ("Bob") Blake – Vice President of Operations

Mr. Blake began working for PALMco as a consultant in 2015 and joined PALMco full-time in 2016 as Vice President of Operations. In that capacity, Mr. Blake oversees the operation of the business of the PALMco, including market entries and strategies, billing system implementation and oversight, implementation and customer data migrations, and sales and marketing compliance. Mr. Blake has over 36 years' experience in the energy industry, including 19 years working at retail energy suppliers (Xoom Energy, MX Energy, United Energy, Connectiv Energy) and 18 years working at a regulated utility company (United Illuminating, a Connecticut electric utility company). During this time, Mr. Blake served in a wide variety of roles related to customer operations, regulatory affairs, and product development. Mr. Blake has also served on professional boards and organizations, including the ISO New England (NEPOOL) Interruptible Loads Task Force. Mr. Blake holds an MBA from the University of New Haven and a Bachelor of Science in Mechanical Engineering from Worcester Polytechnic Institute.

Byron Farnsworth ("Barney") – Vice President of Supply and Scheduling

Mr. Farnsworth joined PALMco, in his current position, in 2016. In his capacity as Vice President of Supply and Scheduling, Mr. Farnsworth is responsible for procuring electric and natural gas supply, hedging supply of electricity and natural gas to create fixed price products, and scheduling the load of electricity and natural gas supply in compliance with regulatory commission and utility company rules for delivery to customers. Mr. Farnsworth's responsibilities also include forecasting PALMco's delivery requirements and managing the company's risk, ensuring compliance with applicable environmental and renewable energy standards, managing PALMco's relationships with wholesale electricity and natural gas suppliers, and developing and implementing electricity and natural gas pricing models.

Exhibit D-2
Operations Expertise
(Continued)

Mr. Farnsworth has over 29 years in the energy industry, including over 10 years at regulated utility companies (New York State Electric & Gas, Rochester Gas and Electric) and over 19 years at deregulated energy supply companies (Your Energy Holdings, MX Energy, Energetix/NYSEG Solutions). Mr. Farnsworth has experience working with many utilities and independent system operators, including PJM. Mr. Farnsworth holds a Bachelor of Science Degree in Electric/Mechanical Engineering and a Master of Business Administration from the Rochester Institute of Technology.

Laura Salvesen – Director of Billing and Operations

Ms. Salvesen has been working in the PALMco businesses since 2005. She currently serves as the Director of Billing and Operations, working closely with utilities on billing/transactional issues. Prior to becoming the Director of Billing and Operations, she served as a Compliance Officer, where she prepared regulatory filings, responded to customer complaints, and assisted in other regulatory compliance-related matters. Prior to that, she served as Supervisor of the customer service department, handling customer questions and complaints.

Exhibit D-3
Key Technical Personnel

Robert Palmese – Managing Member and President

Telephone: 718-851-6655 ext. 8

Email: RVPalmese@palmcoenergy.com

Robert Palmese is the Managing Member of PALMco Power OH, LLC ("PALMco"). Mr. Palmese has about 16 years' experience selling electricity at retail. He is in charge of the day-to-day operations of the PALMco entities that sell electric power and natural gas at retail in the states of Illinois, New York, New Jersey, Pennsylvania, Maryland, Massachusetts, Delaware, Virginia, and Washington D.C. Mr. Palmese graduated from Georgetown University with a Bachelor of Science degree in Business Administration.

Michelle Hofstetter, CPA, CGMA – Chief Financial Officer

Telephone: 718-975-6605

Email: mhofstetter@palmcoenergy.com

Ms. Hofstetter recently joined PALMco as Chief Financial Officer of the various PALMco entities. In that capacity, Ms. Hofstetter directs and oversees PALMco's Accounting Department and is responsible for all financial matters of the organization. She also plays a critical role as a member of the executive team where she advises management and provides strategic direction. Prior to joining PALMco, Ms. Hofstetter spent over 20 years working in various financial executive management positions across several industries including healthcare, IT, telecommunications, advertising, and professional services. She also spent 3 years working in public accounting. Ms. Hofstetter holds a Bachelor of Science Degree in Accounting from The College of Staten Island (CUNY). She is a New York State licensed Certified Public Accountant and holds a CGMA designation.

Robert ("Bob") Blake – Vice President of Operations

Telephone: 718-696-0131

Email: bblake@palmcoenergy.com

Mr. Blake began working for PALMco as a consultant in 2015 and joined PALMco full-time in 2016 as Vice President of Operations of PALMco and its various affiliates. In that capacity, Mr. Blake oversees the operation of the business of the PALMco, including market entries and strategies, billing system implementation and oversight, implementation and customer data migrations, and sales and marketing compliance.

Exhibit D-3
Key Technical Personnel
(Continued)

Mr. Blake has over 36 years' experience in the energy industry, including 19 years working at retail energy suppliers (Xoom Energy, MX Energy, United Energy, Connectiv Energy) and 18 years working at a regulated utility company (United Illuminating, a Connecticut electric utility company). During this time, Mr. Blake served in a wide variety of roles related to customer operations, regulatory affairs, and product development. Mr. Blake has also served on professional boards and organizations, including the ISO New England (NEPOOL) Interruptible Loads Task Force. Mr. Blake holds an MBA from the University of New Haven and a Bachelor of Science in Mechanical Engineering from Worcester Polytechnic Institute.

Adam Bashe – Chief Vice President of Business Development and Chief Sales Officer

Telephone: 718-696-0129

Email: abashe@palmcoenergy.com

Mr. Bashe began joined PALMco in his current position in 2016. In his capacity as Chief Sales Officer, Mr. Bashe is responsible for the assessment, hiring, training, oversight, and monitoring of sales vendor relationships. Prior to joining PALMco, Mr. Bashe spent over 26 years cultivating business strategies and opportunities and leading product development across a wide array of industries. Most recently, Mr. Bashe has led business development initiatives at several retail energy suppliers, both in-house (Direct Energy) and as an external consultant (Aspirity Holding, Town Square Energy). Mr. Bashe holds a Bachelor of Science degree in Economics from Boston University.

Byron Farnsworth ("Barney") – Vice President of Supply and Scheduling

Telephone: 718-696-0121

Email: bfarnsworth@palmcoenergy.com

Mr. Farnsworth joined PALMco in his current position in 2016. In his capacity as Vice President of Supply and Scheduling, Mr. Farnsworth is responsible for procuring electric and natural gas supply, hedging supply of electricity and natural gas to create fixed price products, and scheduling the load of electricity and natural gas supply in compliance with regulatory commission and utility company rules for delivery to customers. Mr. Farnsworth's responsibilities also include forecasting PALMco's delivery requirements and managing the company's risk, ensuring compliance with applicable environmental and renewable energy standards, managing PALMco's relationships with wholesale electricity and natural gas suppliers, and developing and implementing electricity and natural gas pricing models.

Exhibit D-3
Key Technical Personnel
(Continued)

Mr. Farnsworth has over 29 years in the energy industry, including over 10 years at regulated utility companies (New York State Electric & Gas, Rochester Gas and Electric) and over 19 years at deregulated energy supply companies (Your Energy Holdings, MX Energy, Energetix/NYSEG Solutions). Mr. Farnsworth has experience working with many utilities and independent system operators, including PJM. Mr. Farnsworth holds a Bachelor of Science Degree in Electric/Mechanical Engineering and a Master of Business Administration from the Rochester Institute of Technology.

Jennifer Coleman – Regulatory Manager

Telephone: 718-975-9018

Email: jcoleman@palmcoenergy.com

Ms. Coleman recently joined PALMco in 2017. In her capacity as Regulatory Manager, Ms. Coleman is responsible for providing regulatory guidance and promoting overall regulatory compliance, as well as, monitoring legal and regulatory developments in the state, submitting filings, and attending commission stakeholder workshops. Ms. Coleman holds a Juris Doctor from Appalachian School of Law and a Bachelor of the Arts in Legal Studies and Political Science from St. John Fisher College.

Stephen Schemitsch – Sales Channel Manager

Telephone: 718-975-4235

Email: sschemitsch@palmcoenergy.com

Mr. Schemitsch joined PALMco in his current position in 2016. In his capacity as Sales Channel Manager, Mr. Schemitsch serves as a liaison among PALMco's Sales Department, Compliance Department, and external sales vendors to ensure all agents representing PALMco do so in compliance with internal policies and procedures and the applicable laws, regulations. Mr. Schemitsch has over 20 years' experience in a variety of sales positions, including more than 11 years' experience in the sale of retail energy service (IDT Energy, Sperian Energy, Gateway/Direct Energy Services, Constellation NewEnergy, Econnergy Energy) and more than 8 years' experience in the sale of telecommunications services. In these positions, Mr. Schemitsch has developed a wide range of products and sales strategies and has overseen diverse marketing campaigns involving both internal resources and independent contractors.

Exhibit D-3
Key Technical Personnel
(Continued)

Thomas Sheehy– Compliance Officer

Telephone: 718-975-6601

Email: tsheehy@palmcoenergy.com

Mr. Sheehy has been working with PALMco since December 2011. He currently serves as the Compliance Officer for PALMco, responding to customer complaints, developing training materials for agents, and assisting in regulatory-compliance matters. Mr. Sheehy holds a Bachelors in English Literature from Ohio University.

Exhibit D-4
FERC Power Marketer License Number

PALMco's FERC Power Marketer license number is ER10-539-000.



**Public Utilities
Commission**

Asim Z. Haque, Chairman

Commissioners
M. Beth Trombold
Thomas W. Johnson
Lawrence K. Friedeman
Daniel R. Conway

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

RENEWAL

Certificate Number:

10-199E (5)

Issued Pursuant to Case Number(s):

10-139-EL-CRS

A certificate as a Competitive Retail Electric Service Provider is hereby granted to **PALMco Power OH, LLC** whose office or principal place of business is located at **8751 18th Avenue, Brooklyn, NY 11214** to provide **power marketer and power broker** services within the State of Ohio **effective March 8, 2018.**

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated March 9, 2018

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO

Barcy F. McNeal, Secretary

Tanowa M. Troupe, Acting Secretary

Susan Patterson, Acting Secretary

Beverly Hoskinson, Acting Secretary

Certificate Expires: March 8, 2020

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

Technician mmm Date Processed 03/09/18

CRES AUTOMATIC CASE ACTION FORM

Date: **3-9-18**

Case Number: **10-139-EL-CRS**

Company Name and Company Name d/b/a: **PALMco Power OH, LLC**

Company Address: **8751 18th Avenue**

Company City/State/Zip: **Brooklyn NY 11214**

Regulatory Contact: **Jennifer Coleman**

Phone: **718-975-9018**

Email: **regulatory@palmcoenergy.com**

Address: **8751 18th Avenue**

City/State/Zip: **Brooklyn NY 11214**

☒ Renewal

Action Needed:

☐ Issue Certificate Number to:

Effective Date of Certificate:

Certificate Expires:

☒ Renew Certificate Number from: **10-199E (4) to: 10-199E (5)**

Effective Date of Certificate: **3-8-18** Certificate Expires: **3-8-20**

☒ Certified To Provide the Following Services:

☐ Retail Generation

☐ Aggregation

☒ Power Marketer

☒ Power Broker

☐ Governmental Aggregation

☐ Revise Certificate Number: to (check all applicable):

☐ Reflect name change from: to

☐ Reflect address change from: to

☐ Correct Administrative Error:

☐ Reflect Change of Ownership to:

☐ Cancel Certificate Number:

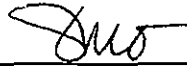
☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 10-0139-EL-CRS
CASE DESCRIPTION: PALMCO POWER OH LLC
DATE OF SERVICE: 3/9/2018
DOCUMENT SIGNED ON: 3/9/2018

Sign Here: _____



APPLICANT

PARTY OF RECORD

PALMCO POWER OH, LLC
JENNIFER COLEMAN
8751 18TH AVENUE
BROOKLYN, NY 11214
Phone: 718-851-6655

ATTORNEY

METZGER, PETER M. ATTORNEY AT LAW
CULLEN AND DYKMAN LLP
44 WALL STREET
NEW YORK, NY 10005
Phone: 212-510-2273
Fax: 212-742-8260

ATTORNEY

PARTY OF RECORD

none

*Coleman, Jennifer
PALMco
8751 18th Avenue
Brooklyn, NY 11214
Phone: (718) 975-9018
Email: bdudas@palmcoenergy.com

ATTORNEY

none

*Metzger, Peter M
Cullen and Dykman
44 Wall Street
New York, NY 10005
Phone: 212-510-2273
Fax: 212-742-8260
Email: pmetzger@culldyk.com

none

*Miller, Vesta R
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
Phone: 614-466-7702
Email: Vesta.Miller@puc.state.oh.us

none

*Coleman, Jennifer

PALMco

8751 18th Avenue

Brooklyn, NY 11214

Phone: (718) 975-9018

Email: bdudas@palmcoenergy.com



PALMcoEnergy
8751 18th Avenue
Brooklyn, NY 11214

PalmcoEnergy.com
CustomerService@PalmcoEnergy.com
1 (877) 726 5862

April 27, 2018

Via Electronic Filing

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

**Re: PALMco Power OH, LLC
Certificate No. 10-199E(5)
Fictitious Name Notification**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-24-11, PALMco Power OH, LLC ("PALMco") is writing to inform PUCO of an addition to a fictitious name, Indra Energy, to its license application. A copy of PALMco's State of Ohio Certificate is attached for your convenience.

PALMco plans to begin marketing with its fictitious name on or about the Summer of 2018. Upon marketing under Indra Energy, PALMco will update its license application accordingly with any applicable contact information including but not limited to website information and email addresses.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman". The signature is written in a cursive, flowing style.

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Power OH, LLC



DATE
04/13/2018

DOCUMENT ID
201810203030

DESCRIPTION
FICTITIOUS NAME REGISTRATION (NFO)

FILING
39.00

EXPED
0.00

CERT
0.00

COPY
0.00

Receipt

This is not a bill. Please do not remit payment.

PALMCO POWER OH LLC
JENNIFER COLEMAN
8751 18TH AVENUE
BROOKLYN, OH 11214

**STATE OF OHIO
CERTIFICATE**

**Ohio Secretary of State, Jon Husted
4161881**

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

INDRA ENERGY

and, that said business records show the filing and recording of:

Document(s)

FICTITIOUS NAME REGISTRATION

Effective Date: 04/02/2018

Document No(s):

201810203030

Expiration Date: 04/02/2023

PALMCO POWER OH LLC
8751 18TH AVENUE
BROOKLYN, NY 11214



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio this
13th day of April, A.D. 2018.

Jon Husted

Ohio Secretary of State

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/27/2018 9:04:34 AM

in

Case No(s). 10-0139-EL-CRS

Summary: Report Notice of Material Change for Fictitious Name electronically filed by
Jennifer Coleman on behalf of PALMco Power OH, LLC

FILE

Ohio

**Public Utilities
Commission**

Asim Z. Haque, Chairman

Commissioners
M. Beth Trombold
Thomas W. Johnson
Lawrence K. Friedman
Daniel R. Conway

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

REVISED RENEWAL

Certificate Number:

10-199E (5)

Issued Pursuant to Case Number(s):

10-139-EL-CRS

A certificate as a Competitive Retail Electric Service Provider is hereby granted to **PALMco Power OH, LLC, dba Indra Energy** whose office or principal place of business is located at **8751 18th Avenue, Brooklyn, NY 11214** to provide **power marketer and power broker** services within the State of Ohio effective **March 8, 2018**.

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

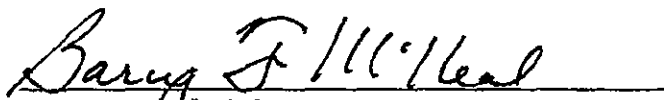
Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: May 2, 2018

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO



Barcy F. McNeal, Secretary

Tanowa M. Troupe, Acting Secretary

Susan Patterson, Acting Secretary

Beverly Hoskinson, Acting Secretary

Certificate Expires: March 8, 2020

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

180 East Broad Street
Columbus, Ohio 43215-3793

Technician mm Date Processed 05/02/18

(614) 466-3016
www.PUCO.ohio.gov

CRES AUTOMATIC CASE ACTION FORM

Date: **5-2-18**

Case Number: **10-139-EL-CRS**

Company Name and Company Name d/b/a: **PALMco Power OH, LLC dba
Indra Energy**

Company Address: **8751 18th Avenue**

Company City/State/Zip: **Brooklyn NY 11214**

Regulatory Contact: **Jennifer Coleman**

Phone: **718-975-9018**

Email: **regulatory@palmcoenergy.com**

Address: **8751 18th Avenue**

City/State/Zip: **Brooklyn NY 11214**

☐ Renewal

Action Needed:

☐ Issue Certificate Number to:

Effective Date of Certificate:

Certificate Expires:

☐ Renew Certificate Number from: to:

Effective Date of Certificate:

Certificate Expires:

☒ Certified To Provide the Following Services:

☐ Retail Generation

☐ Aggregation

☒ Power Marketer

☒ Power Broker

☐ Governmental Aggregation

☒ Revise Certificate Number: **10-199E (5)** to (check all applicable):

☒ Reflect name change from: **PALMco Power OH, LLC** to **PALMco
Power OH, LLC dba Indra Energy**

☐ Reflect address change from: to

☐ Correct Administrative Error:

☐ Reflect Change of Ownership to:

☐ Cancel Certificate Number:

☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 10-0139-EL-CRS
CASE DESCRIPTION: PALMCO POWER OH LLC dba INDRA ENERGY
DATE OF SERVICE: 5/2/2018
DOCUMENT SIGNED ON: 5/2/2018

Sign Here: 

APPLICANT**PARTY OF RECORD**

PALMCO POWER OH, LLC, dba INDRA ENERGY
JENNIFER COLEMAN
8751 18TH AVENUE
BROOKLYN, NY 11214
Phone: 718-851-6655

ATTORNEY

METZGER, PETER M. ATTORNEY AT LAW
CULLEN AND DYKMAN LLP
44 WALL STREET
NEW YORK, NY 10005
Phone: 212-510-2273
Fax: 212-742-8260

ATTORNEY**PARTY OF RECORD**

none

*Coleman, Jennifer
PALMco
8751 18th Avenue
Brooklyn, NY 11214
Phone: (718) 975-9018
Email: bdudas@palmcoenergy.com

ATTORNEY

none

*Metzger, Peter M
Cullen and Dykman
44 Wall Street
New York, NY 10005
Phone: 212-510-2273
Fax: 212-742-8260
Email: pmetzger@culldyk.com

none

*Miller, Vesta R
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
Phone: 614-466-7702
Email: Vesta.Miller@puc.state.oh.us

none

*Coleman, Jennifer

PALMco

8751 18th Avenue

Brooklyn, NY 11214

Phone: (718) 975-9018

Email: bdudas@palmcoenergy.com



PALMco Energy
8751 18th Avenue
Brooklyn, NY 11214

PalmcoEnergy.com
CustomerService@PalmcoEnergy.com
1 (877) 726 5862

July 5, 2018

Via Electronic Filing

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

**Re: PALMco Power OH, LLC
Certificate No. 10-199E(5)
Updated Operations Information- Exhibits A-10, D-1, D-2, & D-3**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-24-11, PALMco Power OH, LLC ("PALMco") is writing to inform PUCO of the following updates to its renewal license application:

Exhibits A-10, D-1, D-2, & D-3

Bob Blake is no longer the Vice President of Operations. Jeremy Schupp is now the Chief Operating Officer. Mr. Schupp has a proven record of management and leadership in energy. Attached is a copy of Mr. Schupp's resume. Mr. Schupp has the following contact information:

Email: Jschupp@palmcoenergy.com
Address: 8751 18th Avenue
Brooklyn, NY 11214
Phone: 718.696.0131
Fax: 718.851.2427

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman". The signature is written in a cursive, flowing style.

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Power OH, LLC

JEREMY E. SCHUPP

Professional Experience

Agera Energy, LLC
Chief Executive Officer

Briarcliff Manor, NY
2016 - 2018

Retail energy marketer serving 1.3 million contracted residential customer equivalents in 16 U.S. states.

ampCNG, LLC - a New Frontiers Holdings company
Chief Operating Officer

Chicago, IL
2016

Leading U.S. compressed natural gas fueling station operator and renewable natural gas project developer.

Aspirity Holdings LLC
Vice President, Chief Operating Officer

Minneapolis, MN
2015 - 2016

Start-up retail energy marketer, and home energy services provider, serving consumers in 4 U.S. states.

energy.me, llc - a New Frontiers Holdings company (acquired by Agera Energy)
President & Chief Executive Officer

Chicago, IL
2013 - 2015

Retail energy marketer serving more than 250,000 residential customer equivalents in 7 U.S. states.

INTL FCStone Inc.
Director of Consulting - Energy

Chicago, IL
2012 - 2013

Global supplier of customized price risk management services to commodity producers and consumers with annual operating revenue of more than \$450 million.

Nestle USA
Group Manager – Commodity Procurement
Purchasing Manager - Energy

Glendale, CA
2008 - 2012
2002 - 2006

The world's leading Nutrition, Health and Wellness company with over \$100 billion in annual sales.

Risk Management Incorporated
Director of Consulting

Chicago, IL
2006 - 2008

Provider of customized price risk management and procurement services to electricity, natural gas and diesel fuel consumers across the US and Canada.

PG&E National Energy Group
Real Time Electricity Trader

Bethesda, MD
2001 - 2002

Developer, builder, owner and operator of electric generating and natural gas pipeline facilities.

Cargill, Inc.
Grain Merchandiser

Wayzata, MN
1998 - 2001

Global leader in the delivery of food, agriculture, and energy with annual revenue of over \$120 billion.

Education

Purdue University, School of Agriculture
Bachelor of Science, Agricultural Economics

West Lafayette IN
1997

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/5/2018 10:44:41 AM

in

Case No(s). 10-0139-EL-CRS

Summary: Correspondence Updated Operations Information electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC



PALMco Energy
8751 18th Avenue
Brooklyn, NY 11214

PalmcoEnergy.com
CustomerService@PalmcoEnergy.com
1 (877) 726 5862

August 27, 2018

Via Electronic Filing

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

**Re: PALMco Power OH, LLC d/b/a Indra Energy
Certificate No. 10-199E(5)
Updated Operations Information- Exhibits A-10, D-1, D-2, & D-3**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-24-11, PALMco Power OH, LLC d/b/a Indra Energy ("PALMco") is writing to inform PUCO of the following update to its renewal license application:

Exhibits A-10, D-1, D-2, & D-3

Byron Farnsworth is no longer the Vice President of Supply and Scheduling. Please contact PALMco's Chief Operating Officer, Jeremy Schupp, for any questions related to Supply and Scheduling.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@palmcoenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman". The signature is written in a cursive, flowing style.

Jennifer Coleman
Regulatory Manager
On behalf of PALMco Power OH, LLC d/b/a Indra Energy

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/27/2018 11:08:09 AM

in

Case No(s). 10-0139-EL-CRS

Summary: Notice Operations Update electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC



Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

October 29, 2018

VIA ELECTRONIC FILING

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

**Re: PALMco Power OH, LLC d/b/a Indra Energy
Certificate No. 10-199E(5)
Material Change Notification**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-24-11, PALMco Power OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following updates to its license renewal application:

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

Phone: (888) 504-6372
Website URL is updated to: www.IndraEnergy.com

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

Name: Indra Energy
Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Phone: (888) 504-6372
Website URL is updated to: www.IndraEnergy.com

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

Add Indra Energy

A-5 Contact person for regulatory or emergency matters (Contact Remains the same, however email address has been updated):

Jennifer Coleman
Regulatory Manager
8751 18th Avenue
Brooklyn, NY 11214
718-975-9018 (p)
718-851-2427 (f)
Regulatory@IndraEnergy.com



Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

A-6 Contact person for Commission Staff use in investigating customer complaints (Contact Remains the same, however email address has been updated):

Thomas Sheehy
Compliance Officer
8751 18th Avenue
Brooklyn, NY 11214
718-975-6601 (p)
718-851-2427 (f)
Compliance@IndraEnergy.com

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

Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Toll Free Phone: (888) 504-6372
Email: CustomerCare@IndraEnergy.com

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or jcoleman@IndraEnergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman".

Jennifer Coleman
Regulatory Manager
On Behalf of Indra Energy

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/29/2018 9:09:38 AM

in

Case No(s). 10-0139-EL-CRS

Summary: Report Updated License Information electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC



Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

November 9, 2018

VIA ELECTRONIC FILING

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

**Re: PALMco Power OH, LLC d/b/a Indra Energy
Certificate No. 10-199E(5)
Material Change Notification- Updated Regulatory Contact**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-24-11, PALMco Power OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following update to its license renewal application:

A-5 Contact person for regulatory or emergency matters

Contact Name: Briana Ashiotes
Title: Corporate and Regulatory Counsel
Address: 8751 18th Avenue, Brooklyn, NY 11214
Telephone: 718.696.0120
Fax: 718.851.2427
Email: Regulatory@IndraEnergy.com

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or Jcoleman@IndraEnergy.com.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Coleman".

Jennifer Coleman
Regulatory Manager
On Behalf of Indra Energy

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/9/2018 9:30:40 AM

in

Case No(s). 10-0139-EL-CRS

Summary: Report Updated Regulatory Contact electronically filed by Jennifer Coleman on behalf of PALMco Power OH, LLC

FILE



10-139-EL-CRS

Indra Energy
1515 Market Street, Suite 1200
Philadelphia, PA, 19102

w: IndraEnergy.com
e: CustomerCare@IndraEnergy.com
toll free: 1 (888) 50-INDRA
1 (888) 504 6372

March 14, 2019

VIA FED-EX

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

**Re: PALMco Power OH, LLC d/b/a Indra Energy
Certificate No. 10-199E(5)
Updated Customer Complaints Contact**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-24-11, PALMco Power OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following update to its license renewal application:

A-6 Contact person for Customer Complaints

Contact Name: Orpheus Craigue
Title: Compliance Officer
Address: 1515 Market Street, Suite 1200
Telephone: 718.975.6611
Fax: 718.851.2427
Email: Compliance@indraenergy.com

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or cgelo@indraenergy.com

Sincerely,

A handwritten signature in black ink, appearing to read "Christina Gelo".

Christina Gelo
Regulatory Specialist

PUCO

2019 MAR 15 PM 2:08

RECEIVED-DOCKETING DIV

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician WEN Date Processed 3/15/19



Indra Energy
515 Market Street Suite 1200
Philadelphia, PA 19102

IndraEnergy.com
Customer Care@indraEnergy.com
1 (888) 504-6372
1 (888) 504-6372

May 1st, 2019

VIA FED-EX

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

**Re: PALMco Power OH, LLC d/b/a Indra Energy
Certificate No. 10-199E(5)
License Material Change**

To the Public Utilities Commission of Ohio ("PUCO"):

Pursuant to Ohio Administrative Code 4901:1-24-11, PALMco Power OH, LLC d/b/a Indra Energy ("Indra") is writing to inform PUCO of the following update to its license renewal application:

A-5 Contact person for Regulatory or Emergency Matters:

Contact Name: Christina Gelo
Title: Regulatory Specialist
Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Telephone: 718.975.9018
Fax: 718.851.2427
Email: Regulatory@indraenergy.com

A-6 Contact person for Customer Complaints:

Contact Name: Keenia Joseph
Title: Director of Compliance
Address: 1515 Market Street, Suite 1200, Philadelphia, PA 19102
Telephone: 718.975.6611
Fax: 718.851.2427
Email: Compliance@indraenergy.com

A-10 Principal Officers, Directors & Partners:

Keenia Joseph- Director of Compliance

Keenia Joseph is the Director of Compliance for Indra Energy with 13 years of experience managing regulatory affairs, reporting, compliance, new market entry, federal and state legislative actions, and regulatory and Attorney General proceedings. During her years in the industry, Ms. Joseph's managed compliance responsibilities for numerous industry legislative and regulatory rule changes, multiple sales channels and relevant materials, including the vetting of vendors, review and approval of sales materials, including, but not limited to scripts, training materials, and disciplinary policies. Ms. Joseph's experiences encompass all states where gas and electric retail energy is deregulated and/or restructured with tenure at companies serving customers behind over 62 utilities in US and Canada. Prior to her current role, Ms. Joseph served as Director of Regulatory Affairs at North American Power and Gas, before and after the sale of the company to Calpine Corporation. Ms. Joseph also spent over 5 years at MXenergy Inc., a Constellation Energy Company. Ms. Joseph earned her B.A. in Corporate Communications from Baruch College and a Certificate of Paralegal Studies from Mercy College.

Penny Guida – Sr. Director of Operations

Ms. Guida has twenty-two years of energy services company experience including customer and systems management, in depth understanding of utility and regulatory requirements, and high-volume process management and control experience. She has recently joined Indra business as the Sr. Director of Operations.

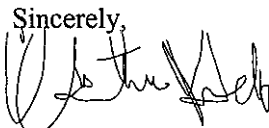
Evelyn Tang- Financial & Data Analyst:

Ms. Tang received her bachelor's degree in Mathematics and Computer Science at St. John's University. Ms. Tang started out in the energy industry approximately 3 years ago as an operations analyst and then progressed to pricing analyst. She has knowledge of industry operations and in depth understanding of the components of the supply side of the market. Additionally, Ms. Tang has experience in the solar industry where she began as an administrative assistant and then promoted to project installations manager.

Kateri Guevara-Sales Operation Manger:

Ms. Guevara is an operations and knowledge management professional with over eight years' experience in deregulated northeast residential markets. Particular areas of strengths include root-cause analysis, problem solving, knowledge and content management, and sales operations.

Please feel free to contact me if you have any questions via phone or email at: 718.975.9018 or cgelo@indraenergy.com

Sincerely,

Christina Gelo
Regulatory Specialist

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/1/2019 3:42:13 PM

in

Case No(s). 10-0139-EL-CRS

Summary: Notice of Material Change electronically filed by Ms. Rebekah J. Glover on behalf of PALMco Power OH, LLC d/b/a Indra Energy

FILE



**Public Utilities
Commission**

Sam Randazzo, Chairman

Commissioners

M. Beth Tromboid
Lawrence K. Friedeman
Dennis P. Deters
Daniel R. Conway

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

REVISED RENEWAL

Certificate Number:

10-199E (5)

Issued Pursuant to Case Number(s):

10-139-EL-CRS

A certificate as a Competitive Retail Electric Service Provider is hereby granted to **PALMco Power OH, LLC, dba Indra Energy** whose office or principal place of business is located at **1515 Market Street, Suite 1200, Philadelphia, PA 19102** to provide **power marketer and power broker** services within the State of Ohio effective **March 8, 2018**.

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: May 6, 2019.

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO

Tanowa M. Troupe, Acting Secretary

Susan Patterson, Acting Secretary

Beverly Hoskinson, Acting Secretary

Certificate Expires: March 8, 2020

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

Technician A

Date Processed 5/6/19

CRES AUTOMATIC CASE ACTION FORM

Date: **5-1-19**

Case Number: **10-139-EL-CRS**

Company Name and Company Name d/b/a: **Palmco Power OH LLC dba Indra Energy**

Company Address: **1515 Market Street Suite 1200**

Company City/State/Zip: **Philadelphia PA 19102**

Regulatory Contact: **Christina Gelo**

Phone: **718-975-9018**

Email: **regulatory@indraenergy.com**

Address: **1515 Market Street Suite 1200**

City/State/Zip: **Philadelphia PA 19102**

☐ Renewal

Action Needed:

☐ Issue Certificate Number to:

Effective Date of Certificate:

Certificate Expires:

☐ Renew Certificate Number from: to:

Effective Date of Certificate:

Certificate Expires:

☒ Certified To Provide the Following Services:

☐ Retail Generation

☐ Aggregation

☒ Power Marketer

☒ Power Broker

☐ Governmental Aggregation

☒ Revise Certificate Number: **10-199E** to (check all applicable):

☐ Reflect name change from: to

☐ Reflect address change from: to

☒ Correct Administrative Error: **Update regulatory contact.**

☐ Reflect Change of Ownership to:

☐ Cancel Certificate Number:

☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 10-0139-EL-CRS
CASE DESCRIPTION: PALMCO POWER OH LLC dba INDRA ENERGY
DATE OF SERVICE: 5/6/2019
DOCUMENT SIGNED ON: 5/6/2019

Sign Here: 

APPLICANT**PARTY OF RECORD****ATTORNEY**

PALMCO POWER OH, LLC, dba INDRA ENERGY NONE
CHRISTINA GELO
1515 MARKET STREET, SUITE 1200
PHILADELPHIA, PA 19102
Phone: 718-851-6655
Email: REGULATORY@INDRAENERGY.COM

ATTORNEY**PARTY OF RECORD****ATTORNEY**

none

*Glover, Rebekah J. Ms.
Whitt Sturtevant
88 E. Broad St
Suite 1590
Columbus, OH 43215
Phone: 937-417-3683
Email: glover@whitt-sturtevant.com

none

*Coleman, Jennifer
PALMco
8751 18th Avenue
Brooklyn, NY 11214
Phone: (718) 975-9018
Email: jcoleman@palmcoenergy.com

none

*Miller, Vesta R
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
Phone: 614-466-7702
Email: Vesta.Miller@puc.state.oh.us

none

*Coleman, Jennifer
PALMco
8751 18th Avenue
Brooklyn, NY 11214
Phone: (718) 975-9018
Email: jcoleman@palmcoenergy.com

Kimberly W. Bojko

OCC EX. 9

From: Haiker, William
Sent: Friday, January 22, 2016 9:01 AM
To: regulatory@palmcoenergy.com
Cc: Bossart, Barbara; Drummond, James; Rhodes, Christopher; Scarberry, Melissa
Subject: Palmco Energy Data Request

Mr. Palmese,

Upon reviewing customer's contacts to our Investigation and Audit Divisions (IAD) and its investigations into some of those complaints, staff is concerned that Palmco may not be following the O.R.C. and O.A.C. rules. In order to determine compliance, please provide the following information.

1. Provide all marketing materials for Palmco's introductory rates offered in Ohio, including telemarketing scripts, door to door marketing scripts and materials.
2. Provide a list of rate type product offers by Palmco in each LDC territory in Ohio (i.e. fixed, introductory, flat)
3. Provide evidence of compliance with Ohio Revised Code 4929.22 (C) (5), which states the following: Other than for the first billing after the effective date of initial rules adopted pursuant to division (A) of section 4929.20 of the Revised Code, highlighting and clear explanation on each customer bill, for two consecutive billing periods, of any changes in the rates, terms, and conditions of service." Compliance is required pursuant to Ohio Administrative Code 4901:1-13-11 (B) (29), which states "Other information required by Ohio law or commission rule or order."
4. Please explain your rationale for offering an introductory rate that is competitive vs. other available offers, and then transitioning the customer to a monthly variable rate that in some cases is 300 to 400% higher when market conditions and associated indices do not warrant such an increase.

Please provide this information by February 5, 2016.

Bill Haiker

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Utility Specialist
(614) 728-9484
PUCO.ohio.gov



This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

Kimberly W. Bojko

OCC EX. 10

From: Haiker, William
Sent: Friday, February 12, 2016 1:45 PM
To: PMetzger@CullenandDykman.com; RVPalmese@PalmcoEnergy.com
Cc: Bossart, Barbara; Drummond, James; Scarberry, Melissa; Rhodes, Christopher
Subject: Re: Palmco Energy Data Request

Mr. Metzger,

Thank you for responding to our inquiry. You are correct that the Commission did rule on the notice not being a rule requirement. Staff may address this issue again in the next rule making proceeding.

Regarding the rate price increase from the introductory price, staff believes that such a large rate increase is unconscionable and misleading because it bears little or no relationship to actual changes in the market. A reasonable customer shopping on the Apples to Apples chart is looking for comparable rates. Although, Palmco identifies the rate as "introductory" the reasonable customer would be led to believe that when moving to a variable rate, that rate may vary based upon market factors but would be similar to other variable or fixed priced offers on the Apples to Apples chart. To increase the price up to 400% when the NYMEX and other market conditions has seen little to minimal changes is unconscionable.

In consideration of your response to our data request, staff requests a meeting with Palmco in our offices in Columbus to discuss our issues and concerns with your marketing practices. It is still our concern that the large rate increases you are imposing at the end of the introductory rate period are in fact misleading, deceptive, and unconscionable. Please advise of possible dates and times when you can meet with us in Columbus.

Bill Haiker

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Utility Specialist
(614) 728-9484
PUCO.ohio.gov



This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.