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November 13, 2019

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

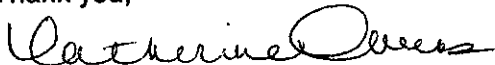
Re: **North Shore Energy Consulting, LLC.**  
**Electric Broker License Renewal Application**

To Whom It May Concern:

Enclosed please find an **Electric Broker License Renewal Application** along with originals and three (3) copies including all exhibits, affidavits, and other attachments for our client, **North Shore Energy Consulting, LLC.**

Once the application has been processed, please forward evidence of approval to the mailing address on the application. If there is any issue, or if you require any further information, please do not hesitate to contact us.

Thank you,



LicenseLogix  
140 Grand Street, Suite 300  
White Plains, NY 10601  
[renewals@licenseologix.com](mailto:renewals@licenseologix.com)  
(800) 292-0909

PUCO

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## Public Utilities Commission

09-793-EL-AGG

Original AGG Case Number	Version
09-793-EL-AGG	May 2016

### RENEWAL APPLICATION FOR ELECTRIC AGGREGATORS/POWER BROKERS

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

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

#### A. RENEWAL INFORMATION

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

☒ Power Broker ☐ Aggregator

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

Legal Name North Shore Energy Consulting, LLC  
Address 18843 White Oak Drive, Chagrin Falls, OH 44023  
PUCO Certificate # and Date Certified 09-167E, 10/14/2009  
Telephone # (330) 524-7559 Web site address (if any) www.northshoreenergy.com

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

Legal Name North Shore Energy Consulting, LLC  
Address 18843 White Oak Drive, Chagrin Falls, OH 44023  
Telephone # (330) 524-7559 Web site address (if any) www.northshoreenergy.com

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

North Shore Energy Consulting, LLC

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

Name Chris Greulich  
Title President  
Business address 18843 White Oak Drive, Chagrin Falls, OH 44023  
Telephone # (330) 524-7559 Fax # (888) 570-4771  
E-mail address chris.greulich@northshoreenergy.com

PUCO

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11-14-2019 11:19 AM

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

Name Chris Greulich  
Title President  
Business address 18843 White Oak Drive, Chagrin Falls, OH 44023  
Telephone # (330) 524-7559 Fax # (888) 570-4771  
E-mail address chris.greulich@northshoreenergy.com

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

Customer Service address 18843 White Oak Drive, Chagrin Falls, OH 44023  
Toll-free Telephone # (888) 515-8150 Fax # (888) 570-4771  
E-mail address chris.greulich@northshoreenergy.com

**A-8 Applicant's federal employer identification number # 26-4286461**

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

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

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

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

**B. APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE**

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

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

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

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

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

☒ No ☐ Yes

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

**B-5** Disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail or wholesale electric service including aggregation service denied, curtailed, suspended, revoked, or cancelled within the past two years.

☒ No ☐ Yes

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

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

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

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

**C-2** **Exhibit C-2 "SEC Filings,"** provide the most recent 10-K/8-K Filings with the SEC. If the applicant does not have such filings, it may submit those of its parent company. An applicant may submit a current link to the filings or provide them in paper form. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that the applicant is not required to file with the SEC and why.

**C-3**    **Exhibit C-3 “Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer certified financial statements covering the life of the business. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns (with social security numbers and account numbers redacted).

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

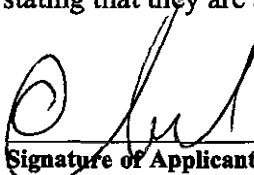
Renewal applicants can fulfill the requirements of Exhibit C-4 by providing a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU’s collateral requirements.

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

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

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

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

 President  
Signature of Applicant & Title

Sworn and subscribed before me this 4 day of November, 2019  
Month Year

  
Signature of official administering oath

Gayle T. Agahi  
Print Name and Title

My commission expires on 7-22-2023



# **AFFIDAVIT**

State of Ohio :

Dainbridge  
(Town)

County of Cuyahoga :

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

He/She is the President (Office of Affiant) of North Shore Energy Consulting, 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 fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
7. The Applicant herein, attests that it will use its best efforts to verify that any entity with whom it has a contractual relationship to purchase power is in compliance with all applicable licensing requirements of the Federal Energy Regulatory Commission and the Public Utilities Commission of Ohio.
8. The Applicant herein, attests that it will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
9. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, the electric distribution companies, the regional transmission entities, and other electric suppliers in the event of an emergency condition that may jeopardize the safety and reliability of the electric service in accordance with the emergency plans and other procedures as may be determined appropriate by the Commission.
10. If applicable to the service(s) the Applicant will provide, the Applicant herein, attests that it will adhere to the reliability standards of (1) the North American Electric Reliability Council (NERC), (2) the appropriate regional reliability council(s), and (3) the Public Utilities Commission of Ohio. (Only applicable if pertains to the services the Applicant is offering)

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

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

Oliver President  
Signature of Affiant & Title

Sworn and subscribed before me this 4 day of November, 2019  
Month Year

Gayle T. Agahi  
Signature of official administering oath

Gayle T. Agahi  
Print Name and Title

My commission expires on 7/22/2023



**Exhibit A-10**

**“Principal Officers, Directors & Partners”**

Chris Greulich  
President  
18843 White Oak Drive  
Chagrin Falls, OH 44023  
(330) 524-7559

**Exhibit B-1**

**“Jurisdictions of Operation”**

North Shore Energy Consulting, LLC is currently licensed and operating as an energy broker in Illinois, Maryland, Massachusetts, and Ohio.

**Exhibit B-2**

**“Experience & Plans”**

Since North Shore Energy Consulting LLC's founding, we have grown a large client base. We have relationships with the top Natural Gas Marketers in the state, and will have them compete for the customers business.

North Shore Energy Consulting, LLC ("North Shore") acts as an energy broker for the client. North Shore reviews and analyzes all offers by energy suppliers prior to consideration by client. All energy supplier contracts or agreements are be presented to the client by North Shore and upon acceptance, signed directly by the client.

The supplier the customer signs a contract with provides all contracted services, billing statements (if applicable), and responds to customer inquiries and complaints as it relates to their service.

North Shore maintains a toll free number for our customers to call if there are any complaints. We will directly respond, over the phone or in person, to customer inquiries and complaints as it relates to the broker service we provide clients.

Case No. 09-793-EL-AGG

**Exhibit B-3**

**"Disclosure of Liabilities and Investigations"**

None

**Exhibit C-1**

**“Annual Reports”**

N/A – North Shore Consulting Energy, LLC is a Limited Liability Company and, therefore, does not have any shareholders.

Case No. 09-793-EL-AGG

**Exhibit C-2**

**“SEC Filings”**

N/A

Case No. 09-793-EL-AGG

**Exhibit C-3**

**“Financial Statements”**

Please see attached.

**Exhibit C-4**

**“Financial Arrangements”**

We are self funded and do not need any other financial arrangements at this time. As a broker, we will not take title to the commodity and therefore do not have financing needs.

Case No. 09-793-EL-AGG

**Exhibit C-6**

**“Credit Rating”**

North Shore Energy Consultants does not subscribe to large credit rating agencies.

Case No. 09-793-EL-AGG

**Exhibit C-7**

**"Credit Report"**

Please see attached.

Case No. 09-793-EL-AGG

**Exhibit C-8**

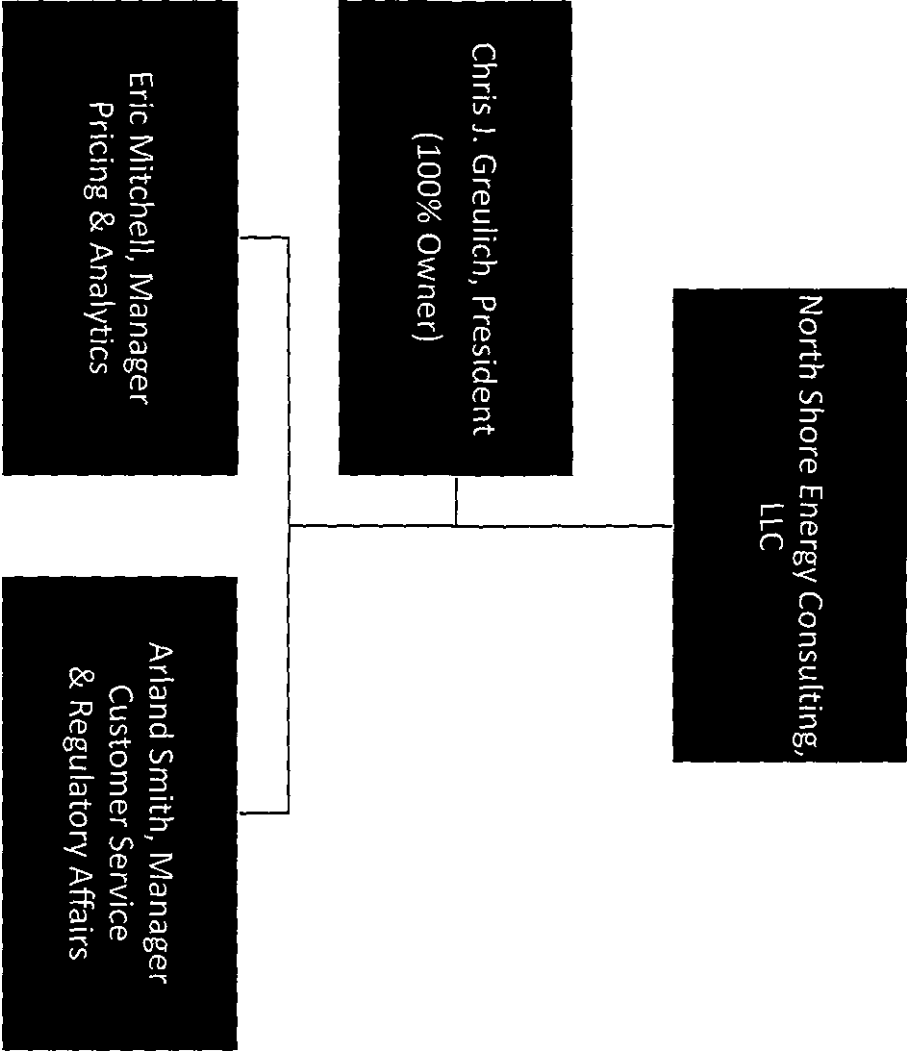
**"Bankruptcy Information"**

N/A

**Exhibit C-9**

**"Merger Information"**

N/A



### **D-3 - Key Technical Personnel**

**Chris J. Greulich, C.E.M.**, is **President** of North Shore Energy Consulting (NSE) and has 20 years of engineering and management expertise. He joined NSE in 2008 as Vice President to manage day to day operations as well as led NSE into new markets. In his leadership capacity, Chris manages all supplier & channel partner relationships, publishes weekly wholesale electric & gas market reports, analyzes utility tariffs and market headroom, and consistently brings innovation to the firm's processes and systems. He provides in-depth energy procurement analysis and consulting in all of the deregulated utility service territories for our largest clients, bringing technical excellence to the process. Chris became a Certified Energy Manager in 2011 and assumed the position of President in 2016 leading a team of Energy Advisors that manage over 700 commercial and industrial clients representing over \$70 million dollars in client electric spend. Chris holds an engineering degree from the University of Akron.

#### **Company Officer Information: Chris J. Greulich**

President: 2016 – present

Certified Energy Manager: 2011 – present

Vice-President: 2008-2016

BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO

North Shore Energy Consulting, LLC	:	
	:	
For Retail Electric Generation Providers	:	Case No. 09-0793-EL-AGG
And Power Marketers	:	
	:	
	:	
	:	

MOTION FOR PROTECTIVE ORDER TO PROTECT CONFIDENTIAL AND PROPRIETARY INFORMATION OF NORTH SHORE ENERGY CONSULTING, LLC.

North Shore Energy Consulting, LLC ("NSEC" or "Movant") pursuant to 83 Ill. Adm. Code. 200.430, hereby moves the Public Utilities Commission of Ohio ("Commission") for a protective order to protect portions of NSEC's Renewal Application for Competitive Retail Electric Generation Providers and Power Marketers ("Application") filing from disclosure for not less than two years to protect highly confidential and proprietary commercial information included therein. The Application contains financial statements marked as Exhibits C-3 and C-5 that NSEC believes should be treated by the Commission as confidential. In support of this motion, NSEC states as follows:

**Background**

Rule 4901-1-24(D) of the Ohio Administrative Code ("O.A.C.") provides for the issuance of an order that is necessary to protect the confidentiality of information contained in documents filed at the Commission to the extent that state and federal laws prohibit the release of such information and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of

the Revised Code ("R.C"). State law recognizes the need to protect information that is confidential in nature, and is the information in Exhibits C-3 and C-5. Section 4928.06(F), R.C., specifically permits the Commission to grant confidentiality to competitive information:

"The Commission shall take such measures as it considers necessary to protect the confidentiality of any such information." Public non-disclosures of the information contained in Exhibit C-3 and C-5 of the application will not impair the purposes of Title 49 as the Commission and its Staff will have access to the information they need to complete the review process.

Simultaneously with the filing of this Motion, Movant has filed its Certification Application for Retail Electric Generation Providers and Power Marketers. Certain information included in the Report is, in Movant's opinion, highly sensitive confidential, trade secrets and proprietary information ("Proprietary information"). Specifically, the Movant seeks protection of the following information, which has been removed from the public version of the report and noted with a "Redaction" stamp:

1. Exhibit C-3 discloses NSEC's financial statements ("Financial Data")

The Financial Data is confidential and proprietary. For the reasons outlined below, NSEC request confidential treatment of all the Financial Data.

- a. The Financial Data is Confidential

The Financial Data contains confidential financial information. NSEC maintains that this data, by definition, qualifies for protection. Further, this data could be utilized to determine market share, sales and "financial success." The

Financial Data is not information that NSEC has, or would, disclose to any person or entity in the public domain.

**B. Disclosure of the Financial Data would harm NSEC**

NSEC's Financial Data is privileged and confidential commercial information, the disclosure of which to competitors would cause competitive harm to NSEC. The Financial Data is on its face confidential, and also could be used to derive confidential trade information and market sensitive information regarding NSEC's provision of services to customers in Ohio.

The electric service industry is highly competitive, and it is imperative that public disclosure of confidential information contained in the Financial Data be avoided for a period of at least two (2) years because of the harm which disclosure of such information would likely cause NSEC.

The Financial Data can be used by NSEC's competitors, or others, to determine NSEC's market share, sales success, product-line success, and business structure via an understanding of its contractual relationship. This information is not publicly available, and it is not information NSEC would willingly share with its competitors.

Disclosure of NSEC's Financial Data will cause NSEC competitive harm. NSEC's competitors can use that information to attempt to drive NSEC out of business. Accordingly, NSEC seeks the requested protection.

Disclosure of commercial information like NSEC's financial statements and market share data is harmful to a company like NSEC because it gives

NSEC's competitors insight into information about NSEC's relative position in the marketplace. It lets those competitors know where NSEC is focusing its efforts.

Once NSEC's competitors become aware of NSEC's market, sales success, product-line success, and business structure, those competitors would be able to adjust their marketing strategies to respond to competition from NSEC. Competition is good; unfair competition is not. Utilizing confidential financial data and market share data to a competitor's detriment is not fair. Further, proprietary financial data can be utilized to price NSEC out of the market in a specific area in order for the competitor to gain market share. NSEC is of the opinion that disclosure of its Financial Data will not only be detrimental to NSEC and its competitive well-being, but ultimately to customers as well when a lack of competition results in price increases.

In summary, the harm that would result if NSEC's Financial Data is not treated as proprietary is twofold. First, the data could be used by NSEC's competitors to determine NSEC's market share, sales volumes, product-lines and product-line success, and business structure. This information could be unfairly and improperly used by the competitors against NSEC in several ways, including via misleading advertising or predatory pricing targeted and intended to diminish NSEC's market share and drive them out of the market completely. This will cause the second harmful result: decreased competition and increased prices. NSEC maintains that by definition, the Financial Data is worthy of protection without any further showing. As such, NSEC respectfully requests that

the Commission enter an Order granting proprietary status to NSEC's Financial Data for a period of two years, without hearing.

WHEREFORE, NSEC Energy Consulting, LLC, respectfully requests that the Commission enter an Order, without hearing, protecting from disclosure for a period of not less than two (2) years, the above referenced information that was submitted as part of NSEC's Renewal Application for Retail Electric Generation Providers and Power Marketers.

Respectfully submitted,

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

Michael R. Donaldson (#0029927)  
*Attorney for Applicant, North Shore  
Energy Consulting, LLC*  
4330 Boston Road  
Brecksville, OH 44141  
Phone: 216-351-3207  
Fax: 216-485-5766  
Email: [mrdonaldson@roadrunner.com](mailto:mrdonaldson@roadrunner.com)

VERIFICATION

STATE OF Ohio  
COUNTY OF Geauga

Chris Greulich, being first duly sworn, deposes and says that he is the President of North Shore Energy Consulting, LLC; that he has read the foregoing Application of North Shore Energy Consulting, LLC, and all of the attachments accompanying and referred to within the Application; and that the statements contained in the Application and the attachments are true, correct and complete to the best of his knowledge, information and belief.

  
Chris Greulich

Subscribed and sworn to before me  
this 28 day of October, 2019.

  
Notary Public

[Stamp of Notary]



NEKU G. AGAHI  
NOTARY PUBLIC  
FOR THE  
STATE OF OHIO  
My Commission Expires  
August 28, 2023