

FILE



Enel X North America, Inc.
One Marina Park Drive
Suite 400
Boston, MA 02210

Tel: 617 224 9900
Fax: 617 224 9910

VIA UPS OVERNIGHT MAIL

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

August 11, 2020

RE: Case No. 14-1597-EL-AGG

**Enel X North America, Inc. Renewal Application for Competitive Retail Electricity Services
Provider - Broker / Aggregator Certificate 14-338E(1)**

Public Utilities Commission of Ohio:

Pursuant to Rule 4901:1-27-09 of the Ohio Administrative Code, Enel X North America, Inc., respectfully submits this application for certification renewal. Enel X North America's current certification, identified as Certificate Number 14-338E(1), was granted for the period October 12, 2018 through October 12, 2020.

Please contact me if the Commission requires any additional information.

Sincerely,

Kelly Smith
Internal Controls Specialist
(919) 244-9043
Kelly.smith@enel.com

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Encls.

- Competitive Retail Electricity Broker Application
- Three (3) copies

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Technician A Date Processed 8/12/20



Public Utilities Commission

Competitive Retail Electric Service (CRES)
Provider Application

Case Number: 14 - 1597 -EL- AGG

Please complete all information. Identify all attachments with a label and title (example: Exhibit C-2 Financial Statements). For paper filing, you can mail the original and three complete copies to the Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus, Ohio 43215-3793.

A. Application Information

A-1. Provider Type.

Select the competitive retail electric service (CRES) provider type(s) for which the applicant is seeking certification. Please note you can select more than one.

Aggregator



Power Broker



Power Marketer



Retail Electric
Generation Provider



A-2. Applicant's legal name and contact information.

Provide the name and contact information of the business entity.

Legal Name: Enel X North America, Inc.
Street Address: One Marina Park Drive, Suite 400
City: Boston State: MA Zip: 02210
Telephone: 888-363-7662 Website: enelx.com

A-3. Names and contact information under which the applicant will do business in Ohio.

Provide the names and contact information the business entity will use for business in Ohio. This does not have to be an Ohio address and may be the same contact information given in A-2.

Name: Enel X North America, Inc.
Street Address: One Marina Park Drive, Suite 400
City: Boston State: MA Zip: 02210
Telephone: 888-363-7662 Website: enelx.com

A-4. Names under which the applicant does business in North America.

Provide all business names the applicant uses in North America. You do not need to include the names provided in A-2 and A-3.

Name(s): See Exhibit A-4

Name:	Kelly Smith		
Street Address:	One Marina Park Drive, Suite 400		
City:	Boston	State:	MA Zip: 02210
Telephone:	919-244-9043	Email:	compliance.enelx@enel.com

Name:	Kelly Smith		
Street Address:	One Marina Park Drive, Suite 400		
City:	Boston	State:	MA Zip: 02210
Telephone:	919-244-9043	Email:	compliance.enelx@enel.com

Street Address: One Marina Park Drive, Suite 400

City: Boston State: MA Zip: 02210

Toll-free 888-363-7662 Email: support.enelx@enel.com

FEIN: 87-0698303

☐ Sole Proprietorship
 ☐ Limited Liability Partnership (LLP)
 ☒ Corporation
 ☐ Partnership

☐ Limited Liability Company (LLC)
 Other: _____

AEP Ohio	DP&L	Duke Energy Ohio	FirstEnergy – Cleveland Electric Illuminating
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

FirstEnergy – Ohio
Edison



FirstEnergy – Toledo
Edison



Class of customer selection:

Commercial



Industrial



Mercantile



Residential



A-11. Start Date.

Indicate the approximate start date the applicant began/will begin offering services.

Date: _____

A-12. Principal officers, directors and partners.

Please provide an attachment for all contacts that should be listed as an officer, director or partner.

A-13. Company history.

Provide an attachment with a concise description of the applicant's company history and principal business interests.

A-14. Secretary of State.

Provide evidence that the applicant is currently registered with the Ohio Secretary of State.

B. Managerial Capability

Provide a response or attachment for each of the sections below.

B-1. Jurisdiction of operations.

List all jurisdictions in which the applicant or any affiliated interest of the applicant is certified, licensed, registered or otherwise authorized to provide retail natural gas service or retail/wholesale electric service as of the date of filing the application.

B-2. Experience and plans.

Describe the applicant's experience in providing the service(s) for which it is applying (e.g., number and type of customers served, utility service areas, amount of load, etc.). Include the 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 Sections 4928.10 and/or 4929.22 of the Ohio Revised Code.

B-3. Disclosure of liabilities and investigations.

For the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant, describe all existing, pending or past rulings, judgments, findings, contingent liabilities, revocation of authority, regulatory investigations, judicial actions, or other formal or informal notices of violations, or any other matter related to competitive services in Ohio or equivalent services in another jurisdiction.

B-4. Disclosure of consumer protection violations.

Has the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years? If yes, attach a document detailing the information.

Yes

☐

No

☒

B-5. Disclosure of certification denial, curtailment, suspension, or revocation.

Has the applicant, affiliate, or a predecessor of the applicant had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, revoked, or cancelled or been terminated or suspended from any of Ohio's Natural Gas or Electric Utility's Choice programs within the past two years? If yes, attach a document detailing the information.

Yes

☐

No

☒

B-6. Environmental disclosure.

This section is only applicable if power marketer or retail electric generation provider have been selected in A-1.

Provide a detailed description of how the applicant intends to determine its generation resource mix and environmental characteristics, including air emissions and radioactive waste. Include the annual projection methodology and the proposed approach to compiling the quarterly actual environmental disclosure data. See 4901:1-21-09 of the Ohio Administrative Code for additional details of this requirement.

C. Financial Capability

Provide a response or attachment for each of the sections below.

C-1. Financial reporting.

Provide a current link to the most recent Form 10-K filed with the Securities and Exchange Commission (SEC) or attach a copy of the form. If the applicant does not have a Form 10-K, submit the parent company's Form 10-K. If neither the applicant nor its parent is required to file Form 10-K, state that the applicant is not required to make such filings with the SEC and provide an explanation as to why it is not required.

C-2. Financial statements

Provide copies of the applicant's two most recent years of audited financial statements, including a 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, provide 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 bank account numbers redacted.

If the applicant is unable to meet the requirement for two years of financial statements, the Staff reviewer may request additional financial information.

C-3. Forecasted financial statements.

Provide two years of forecasted income statements based solely on the applicant's anticipated business activities in the state of Ohio.

Include the following information with the forecast: a list of assumptions used to generate the forecast; a statement indicating that the forecast is based solely on Ohio business activities only; and the name, address, email address, and telephone number of the preparer of the forecast.

The forecast may be in one of two acceptable formats: 1) an annual format that includes the current year and the two years succeeding the current year; or 2) a monthly format showing 24 consecutive months following the month of filing this application broken down into two 12-month periods with totals for revenues, expenses, and projected net incomes for both periods. Please show revenues, expenses, and net income (revenues minus total expenses) that is expected to be earned and incurred in business activities only in the state of Ohio for those periods.

If the applicant is filing for both an electric certificate and a natural gas certificate, please provide a separate and distinct forecast for revenues and expenses representing Ohio electric business activities in the application for the electric certificate and another forecast representing Ohio natural gas business activities in the application for the natural gas certificate.

C-4. Credit rating.

Provide a credit opinion disclosing the applicant's credit rating as reported by at least one of the following ratings agencies: Moody's Investors Service, Standard & Poor's Financial Services, Fitch Ratings or the National Association of Insurance Commissioners. If the applicant does not have its own credit ratings, substitute the credit ratings of a parent or an affiliate organization and submit 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 "Not Rated".

C-5. Credit report.

Provide a copy of the applicant's credit report from Experian, Equifax, TransUnion, Dun and Bradstreet or a similar credit reporting organization. If the applicant is a newly formed entity with no credit report, then provide a personal credit report for the principal owner of the entity seeking certification. At a minimum, the credit report must show summary information and an overall credit score. Bank/credit account numbers and highly sensitive identification information must be redacted. If the applicant provides an acceptable credit rating(s) in response to C-4, then the applicant may select "This does not apply" and provide a response in the box below stating that a credit rating(s) was provided in response to C-4.

C-6. Bankruptcy information.

Within the previous 24 months, have any of the following filed for reorganization, protection from creditors or any other form of bankruptcy? If yes, attach a document detailing the information.

Applicant

Parent company of the applicant

Affiliate company that guarantees the financial obligations of the applicant

Any owner or officer of the applicant

Yes

☐

No

☒

C-7. Merger information.

Is the applicant currently involved in any dissolution, merger or acquisition activity, or otherwise participated in such activities within the previous 24 months? If yes, attach a document detailing the information.

Yes

☒

No

☐

C-8. Corporate structure.

Provide a graphical depiction of the applicant's corporate structure. Do not provide an internal organizational chart. The graphical depiction should include all parent holding companies, subsidiaries and affiliates as well as 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 the applicant may respond by stating that it is a stand-alone entity with no affiliate or subsidiary companies.

C-9. Financial arrangements.

This section is only applicable if power marketer or retail electric generation provider have been selected in A-1.

Provide copies of the applicant's financial arrangements to satisfy collateral requirements to conduct retail electric/natural gas business activities (e.g., parental guarantees, letters of credit, contractual arrangements, etc., as described below).

Renewal applicants may provide a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU's collateral requirements. The statement or letter must be on the utility's letterhead and dated within a 30-day period of the date the applicant files its renewal application.

First-time applicants or applicants whose certificate has expired must meet the requirements of C-9 in one of the following ways:

The applicant itself states that it is investment grade rated by Moody's Investors Service, Standard & Poor's Financial Services, or Fitch Ratings and provides evidence of rating from the rating agencies. If you provided a credit rating in C-4, reference the credit rating in the statement.

- i. The applicant's parent company is investment grade rated (by Moody's, Standard & Poor's, or Fitch) and guarantees the financial obligations of the applicant to the LDU(s). Provide a copy of the most recent credit opinion from Moody's, Standard & Poor's or Fitch.
- ii. The applicant's parent company 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 parent company's financials and a copy of the parental guarantee must be included in the application if the applicant is relying on this option.
- iii. The applicant can provide evidence of posting a letter of credit with the LDU(s) listed as the beneficiary, in an amount sufficient to satisfy the collateral requirements of the LDU(s).

D. Technical Capability

Provide an attachment for each of the sections below.

D-1. Operations.

Power brokers/aggregators: Include details of the applicant's business operations and plans for arranging and/or aggregating for the supply of electricity to retail customers.

Power Marketers/Generators: Describe the operational nature of the applicant's business, specifying whether operations will include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services, as well as other services used to arrange for the purchase and delivery of electricity to retail customers.

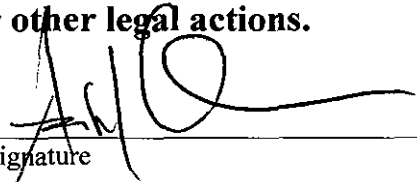
D-2. Operations expertise and key technical personnel.

Provide evidence of the applicant's experience and technical expertise in performing the operations described in this application. Include the names, titles, e-mail addresses, telephone numbers and background of key personnel involved in the operational aspects of the applicant's business.

D-3. FERC power marketer authorization.

Provide the FERC docket granting the applicant power marketer authority.

As authorized representative for the above company/organization, I certify that all the information contained in this application is true, accurate and complete. I also understand that failure to report completely and accurately may result in penalties or other legal actions.


Signature

8/11/2020
Date

ASST. SECRETARY
Title

Competitive Retail Electric Service Affidavit

County of Suffolk :


State of Massachusetts :

Aaron MacQueen, 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, and that it will amend its application while it is pending if any substantial changes occur regarding the information provided.
2. The applicant will timely file an annual report of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Sections 4905.10(A), 4911.18(A), and 4928.06(F), Ohio Revised Code.
3. The applicant will timely pay any assessment made pursuant to Sections 4905.10, 4911.18, and 4928.06(F), Ohio Revised Code.
4. The 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. The applicant 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 will fully comply with Section 4928.09, Ohio Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
7. The applicant will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
8. The applicant 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 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, 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.
11. The Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the 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 consumer complaints.

12. The facts set forth above are true and accurate 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.

13. Affiant further sayeth naught.

 ASST. SECRETARY
Signature of Affiant & Title

Sworn and subscribed before me this 1st day of August, 2020
Month Year


Signature of official administering oath

Laura A. Bergeron Notary Public
Print Name and Title

My commission expires on January 27, 2023



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Exhibit A-4: Enel X North America, Inc. Corporate Structure

There are no other names by which the Applicant does business in North America. The Applicant does have subsidiaries and affiliates which separately conduct business in North America, and those subsidiaries and affiliates are illustrated below:

Enel North America, Inc.
Enel X North America, Inc.
Enel X Federal, LLC,
EnTech Utility Service Bureau, Inc.,
NYC Storage (353 Chester) SPE LLC,
Enel X Finance Partner, LLC,
Enel X Asputeck Ave. Project, LLC
Enel X Hayden Rowe St Project, LLC,
Enel X Morrissey Blvd. Project, LLC,
Enel X MA Holdings, LLC,
Enel X College Ave. Project, LLC.
WeSpire, Inc
Genability, Inc.
Hatch Data Inc.

Exhibit A-12: Principal Officers and Partners

The business address for all below officers and directors:

Enel X North America, Inc., One Marina Park Drive, Suite 400, Boston, MA 02210

Officers:	Aaron MacQueen, Compliance Officer and
Surya Panditi, CEO and President	Assistant Secretary
Megan Beauregard, Vice President and	
Secretary	Board of Directors:
Gianfranco Butera, Treasurer	Surya Panditi

Exhibit A-13: Company History

Enel X North America (f.k.a. EnerNOC, Inc.) was founded as a New Hampshire Limited Liability Company (LLC) in December 2001 and subsequently incorporated as a Delaware corporation in June 2003. In August 2017, Enel X North America, Inc. was acquired by Enel Green Power North America, Inc., a subsidiary of Enel SpA, an Italian company. In January 2018, the ownership of Enel X North America, Inc. was transferred to Enel North America, Inc., an Italian subsidiary of Enel SpA. Enel X NA is a leading provider of energy intelligence software, or EIS, and demand response solutions to enterprises, utilities, and electric power grid operators. Our EIS provides our enterprise customers with a suite of Software-as-a-Service, or SaaS, offerings that improve how enterprises manage and control energy costs for their organizations. We continually enhance and expand our EIS to meet the evolving needs of our enterprise customers by providing SaaS solutions to manage:



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- energy cost visualization, budgets, forecasts, and accruals;
- utility bill validation and payment;
- facility optimization, including benchmarking facilities and identifying cost savings opportunities;
- energy project tracking;
- reporting for energy and sustainability disclosure and compliance; and
- peak energy demand and the related cost impacts.

Our EIS helps our enterprise customers quickly analyze data, achieve real-time visibility and intelligence about their organization's energy usage, reduce operational costs, comply and report on sustainability requirements, and drive better business decisions. We offer our EIS to our enterprise customers at four subscription levels: basic, standard, professional, and industrial. In addition, our EIS provides our utility customers with a SaaS-based customer engagement platform that allows utilities to:

- increase customer satisfaction;
- meet energy efficiency mandates;
- reduce cost through lower call volume; and
- increase revenue through more effective targeting of existing utility-sponsored programs.

We deliver shared value for both the utility and its customers by combining our deep expertise with commercial, institutional and industrial end-users of energy, or C&I end-users, with energy data analytics, machine learning, and predictive algorithms to deliver segmentation and targeting capabilities that enable utilities to serve their most complex market segments, including C&I end-users, and small and medium-sized enterprises.

Our EIS also provides our enterprise and utility customers located in restructured or deregulated markets with the ability to more effectively manage energy supplier selection and the energy procurement process by providing highly-structured auction events designed to yield transparent and competitive energy pricing. Our energy procurement application consists of an online auction platform that enables our enterprise and utility customers to get the best price for electricity, natural gas and other energy resources by having energy suppliers compete for their business, as well as supplier contract management and price alert tools. Our energy procurement solutions also include supply procurement advisory services that assist our enterprise customers in developing and implementing risk management and purchasing strategies that provide maximum price transparency and structural savings.

In addition, our demand response solutions provide our utility customers and electric power grid operators with a managed service demand response resource where we match obligation, in the form of megawatts, or MW, that we agree to deliver to our utility customers and electric power grid operators, with supply, in the form of MW, that we are able to curtail from the electric power grid through our arrangements with C&I end-users. When we are called upon by our utility customers and electric power grid operators to deliver our contracted capacity, we use our Network Operations Center, or NOC, to remotely manage and reduce electricity consumption across our network of C&I end-user sites, making demand response capacity available to our utility customers and electric power grid operators on demand while helping C&I end-users achieve energy savings, improve financial results and realize environmental benefits. We receive periodic payments from our utility customers and electric power grid operators for providing our demand response solutions, and we share these periodic



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payments with C&I end-users in exchange for those C&I end-users reducing their power consumption when called upon by us to do so. Our demand response solutions are also capable of providing our utility customers with the underlying technology to manage their own utility-sponsored demand response programs and secure reliable demand-side resources. This product consists of long-term contracts with our utility customers for a technology-enabled managed service that provides our utility customers with real-time load monitoring, dispatching applications, customizable reports, and measurement and verification tools.



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Exhibit A-14: Secretary of State

Below please find evidence that Enel X North America, Inc. (1930159) is still currently registered with the Ohio Secretary of the State, retrieved from the Business Filing Portal (<https://businesssearch.ohiosos.gov/>).

The screenshot displays the 'BUSINESS DETAILS & FILINGS' page for Enel X North America, Inc. (1930159). The page includes a 'Business Details' section with the following information:

Business Details	
Entity #:	1930159
Business Name:	ENEL X NORTH AMERICA, INC.
Filing Type:	FOREIGN CORPORATION
Status:	Active
Original Filing Date:	04/20/2010
Exp. Date:	
Location:	DELAWARE

Below the business details is the 'AGENT/REGISTRANT INFORMATION' section, which lists the following details:

COGENCY GLOBAL INC
3958-D BROWN PARK DRIVE
HILLIARD OH 43026
12/11/2018
Active

There is a sign-up box for email notifications: "Sign up to receive e-mail notifications of any changes or updates made to this business entity."

The 'FILINGS' section shows a table of filings:

Filing Type	Date of Filing	Document ID	Download Image as PDF
FOREIGN LICENSE/FOR-PROFIT	04/20/2010	201011000048	Download Image
FOREIGN DESIGNATED APPOINTMENT OF AGENT	04/23/2013	201311400281	Download Image

Exhibit B-1: Jurisdictions of Operation

Enel X NA offers consulting and procurement services throughout the US and Canada anywhere the utility tariffs permit transport by third party natural gas marketers or where there are customer choice programs for natural gas supply. Enel X NA has obtained licenses in jurisdictions requiring licensure, but offers service anywhere in North America where our customers have a need for our services.

Enel X North America Energy Procurement Services Licensure		
State	Electric	Natural Gas
Connecticut	Docket 07-04-31	N/A
Delaware	Order 7369, Docket 08-6	N/A
District of Columbia	Lic EA 12-6, Order 16804	Lic GA 2015-03, Order 17948
Illinois	Docket 11-0701	N/A
Maine	Docket 2007-565, Lic 2005-708	N/A
Maryland	Lic IR-2283	Lic IR-2783



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Massachusetts	Lic EB-098	Lic RA-089
New Hampshire	Lic DM 09-171	Lic DM 12-080
New Jersey	Reg EA-0081, EC-0022	N/A
Ohio	Lic 14-338E(1)	Lic 12-269G(2)
Oregon	Order 12-163, Docket EA-17	N/A
Pennsylvania	Docket A-2009-2109812	Docket A-2015-2484489
Rhode Island	Docket D-96-6 (K5)	Docket 2379(V2)
Texas	Lic 80346	N/A
Virginia	Docket PUE-2016-00036	N/A

Exhibit B-2: Experience and Plans

Enel X NA is engaged in providing consulting services to commercial, industrial, and institutional customers to help them select the most appropriate natural gas and electricity purchasing strategy for their organization. In addition, Enel X NA provides its customers with a variety of data analysis, utility bill information, demand response, carbon accounting, and energy efficiency services. Customers may contract with Enel X NA solely for energy procurement services or for Enel X NA's full suite of energy management services. Enel X NA's response to Section B-2 of this application will be specific to Enel X NA's contract for natural gas procurement services.

Enel X NA's agreement with its customers clearly states Enel X NA's Scope of Work for the customer, Enel X NA fees, and required notice, procedures, and fees associated with early termination. Enel X NA assigns each customer an account manager who is responsible for delivering services to the customer in accordance with the customer's contract. All customers will have full communication access to their Enel X NA account manager as well as Enel X NA's toll free 1-800 number if they need to speak with a manager regarding a complaint. All dually executed contracts are entered into Enel X NA's Customer Relationship Management (CRM) system where key pieces of information are entered to allow Enel X NA's accounting group to accurately bill customers. Enel X NA may bill customers' retainer or consulting fees on a monthly, quarterly, or annual basis. A fraction of Enel X NA's customers request that Enel X NA's consulting fees are loaded into the bids of competitive energy suppliers. In these situations, Enel X NA's fees are spelled out clearly in the Enel X NA contract in a \$/Dth basis and Enel X NA relies on the competitive retail energy supplier to provide billing to the customer and remittances to Enel X NA of the Enel X NA fee.

Enel X NA maintains internal controls regarding all customer complaints which are elevated to management. Enel X NA makes commercially reasonable efforts to address all customer complaints and disputes within the framework of contracts that are in place between Enel X NA and the customer.

Enel X NA currently provides energy procurement services to approximately 300 commercial, industrial, institutional, and governmental customers. At present, Enel X NA's energy procurement customer base is generally concentrated in ISO-NE, NYISO, and eastern PJM. Enel X NA has approximately 200 million Dth & 14 billion KWH of annual load under management, with approximately 50 million Dth & 1.7 billion KWH under management in Ohio.



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Exhibit B-3: Disclosure of Liabilities and Investigations

Enel X NA, Inc. is subject to legal proceedings, claims and litigation arising in the ordinary course of business. We do not expect the ultimate costs to resolve these matters to have a material adverse effect on our consolidated financial condition, results of operations or cash flows.

Exhibit C-1: Financial Reporting

Quarterly Financial Statements: <https://www.enel.com/investors/a/2016/09/interim>

Annual Financial Statements: <https://www.enel.com/investors/a/2016/09/annual>

Exhibit C-2: Financial Statements

As a subsidiary of Enel SpA, Enel X NA does not have its own annual reports or audited financial statements. Annual reports for Enel X NA's ultimate parent company, Enel SpA, can be found here: <https://www.enel.com/investors/a/2016/09/annual>

Exhibit C-3: Forecasted Financial Statements

N/A – Enel X NA does not have its own annual reports or audited financial statements.

Exhibit C-4: Credit Rating

Please refer to the parent company's investor ratings at:
<https://www.enel.com/investors/a/2016/08/ratings>

Exhibit C-5: Credit Report

Please refer to the parent company's investor ratings at:
<https://www.enel.com/investors/a/2016/08/ratings>

Exhibits C-6 and C-7: Bankruptcy Information and Merger Information

Enel X NA has never had a bankruptcy event. Enel X NA was acquired by Enel Green Power North America, Inc. (EGPNA) in August 2017. Ownership of Enel X North America, Inc. was transferred from EGPNA to Enel X International, SrL. Please see attached Articles of Incorporation.

Exhibit C-8: Corporate Structure

Please see image from Exhibit A-4.

Exhibits D-1 Operations



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Enel X NA's energy procurement practice group consists of an energy price and risk management consulting offering that provides customers located in restructured or deregulated markets throughout the United States with the ability to more effectively manage the energy supplier selection process, including energy supply product procurement and implementation. Enel X NA provides a framework for developing and implementing risk management strategies and executing purchasing strategies that provide maximum price transparency and structural savings on an ongoing basis for our commercial and industrial customers. Using a competitive bid process, Enel X NA delivers recommendations on energy price structures, terms and conditions from available competitive suppliers of energy commodities, including electricity, natural gas and refined products. Enel X NA's UBM platform includes a set of online features including centralizing, tracking, and presenting utility bill and enterprise-wide utility financial information, such as budgets and forecasts, while assessing bill accuracy and savings opportunities.

Exhibit D-2: Key Technical Personnel

The business address and contact information for all below personnel:

Enel X North America, Inc., One Marina Park Drive, Suite 400, Boston, MA 02210
Support.enelx@enel.com, 1-888-363-7662

Sean Perry, Director of Energy Procurement

Mr. Perry has been with Enel X since 2010. He is deeply experienced in the strategic planning, facilitation, and execution of large-scale energy procurements on behalf of both utilities and large C&I users. Mr. Perry has administered hundreds of large-scale brown and renewable energy transactions, including numerous solicitations for renewable generation assets, as well as hundreds of large-scale natural gas transactions. Mr. Perry successfully developed and administered the first ever auction RFP for renewable generation assets within Europe.

Mr. Perry has worked with some of the country's largest investor-owned utilities, public power cooperatives, and large commercial customers in all stages of the procurement process for a multitude of energy commodities. Mr. Perry is able to leverage his robust transactional history to apply numerous best practices and lessons-learned to various components of RFP processes.

Adam Taranto, Senior Manager of Energy Procurement

Adam manages Enel X NA's Energy Procurement Operations team. The Procurement Operations team is responsible for facilitating energy procurement solicitations and coordination of pre-event documents and data gathering, as well as post-contract tasks such as facilitating successful customer enrollment and managing payment issues.

Prior to Enel X NA, Adam worked within Strategic Procurement at National Grid with roles in performance management and process improvement. In this capacity, he delivered several corporate initiatives to improve the productivity and cost-effectiveness of the US Supply Chain. Adam has a bachelor's degree from Bates College and an MBA from Boston University.

Michael Dougher, Senior Manager, Market Intelligence & Portfolio Analytics

Michael has been providing energy-consulting services with a focus on the solicitation of power, natural gas, and environmental commodities since 2009. He currently leads a team of



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seasoned Analysts and Energy Procurement Managers responsible for structuring and executing tailored energy strategies throughout North America. Michael joined the Enel X NA team via the acquisition of EnerNOC in 2017 while managing a team of procurement advisors and a book of government, commercial, industrial power clients in ERCOT and Western PJM.

Dan Pugh, Director of Energy Advisory

Dan has been in the energy sector for 27 years, working for companies such as Enron Energy Services, AEP Energy, EnergyGateway LLC, World Energy and Enel X NA, and served on the logistics, trading and pricing sides of the retail supply business. He has served in a leadership role across a number of functions within the business, supporting all facets of the business, including regulatory, pricing, customer management and operational areas. Dan joined Enel X NA in 2015 with the World Energy Solutions acquisition, where he runs a team of seasoned, professional procurement managers.

Exhibit D-3: FERC Power Marketer Authorization

EXNA is an Aggregator/Broker and does not operate as a CRS; thus, an MBRA is not required.