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20-1596-EL-CRS

Via Federal Express

October 14, 2020

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

PUCO

2020 OCT 15 AM 9:52

Re: Application for Ohio Competitive Retail Electric Service for Grand Energy, LLC

Ladies/Gentlemen:

In regards to the above-referenced matter, enclosed please find one original application together with two copies of the same and one redacted copy. Additionally, Grand Energy, LLC is seeking file the following exhibits under seal:

1. Exhibit C-2 – Financial Statements;
2. Exhibit C-3 – Forecasted Financial Statements;
3. Exhibit C-5 - Credit Report; and
4. Exhibit C-9 - Financial Arrangements.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me.

Respectfully,

Michelle Mann

Michelle Mann
Director of Government Affairs and
Regulatory Paralegal
Feller Law Group, PLLC
Phone: (718) 690-3480
Email: michellemann@feller.law

On behalf of Grand Energy, LLC

Enclosures

This is to certify that the images appearing are at
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Public Utilities Commission

Competitive Retail Electric Service (CRES)
Provider Application

Case Number: 30 - 1596 -EL- CRS

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.

2020 OCT 15 AM 9:52

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
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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

Provide the name and contact information of the business entity.

Legal Name: Grand Energy, LLC
Street Address: 15215 N Kierland Blvd, Unit 830
City: Scottsdale State: AZ Zip: 85254
Telephone: (888) 970-0838 Website: www.grand-energy.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: Grand Energy, LLC
Street Address: 15215 N Kierland Blvd, Unit 830
City: Scottsdale State: AZ Zip: 85254
Telephone: (888) 970-0838 Website: www.grand-energy.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): Grand Energy, LLC

A-5. Contact person for regulatory matters.

Name: Tom Willetts
Street Address: 15215 N Kierland Blvd, Unit 830,
City: Scottsdale State: AZ Zip: 85254
Telephone: (631) 335-1582 Email: tw@grand-energy.com

A-6. Contact person for PUCO Staff use in investigating consumer complaints.

Name: Tom Willetts
Street Address: 15215 N Kierland Blvd, Unit 830,
City: Scottsdale State: AZ Zip: 85254
Telephone: (631) 335-1582 Email: tw@grand-energy.com

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

Street Address: 15215 N Kierland Blvd, Unit 830,
City: Scottsdale State: AZ Zip: 85254
Toll-free Telephone: (888)970-0838 Email: service@grand-energy.com

A-8. Applicant's federal employer identification number.

FEIN: 844095570

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

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

A-10. Identify current or proposed service areas.

Identify each service area in which the applicant is currently providing service or intends to provide service and identify each customer class that the applicant is currently serving or intends to serve.

Service area selection:

AEP Ohio <input checked="" type="checkbox"/>	DP&L <input checked="" type="checkbox"/>	Duke Energy Ohio <input checked="" type="checkbox"/>	FirstEnergy – Cleveland Electric Illuminating <input checked="" type="checkbox"/>
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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: January 1, 2021

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.

1. 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.
1. 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.
1. 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

Vice President of Operations

Title

7/24/2020
Date

Competitive Retail Electric Service Affidavit

County of Suffolk :

State of New York:


Tom Willetts

, 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.



Signature of Affiant & Title

Sworn and subscribed before me this 24 day of July, 2020
Month Year



Signature of official administering oath

Tom Willetts, Vice President of Operations

Print Name and Title

STEPHEN J. DEMAIO
NOTARY PUBLIC, State of New York
No. 01DE4919049
Qualified in Suffolk County

My commission expires on _____
Commission Expires Feb. 1, 2022

Exhibit A-12

Principal Officers, Directors & Partners

Response:

High Rise Energy Group, LLC is the parent company of Grand Energy, LLC.

High Rise Energy Group, LLC
15215 N Kierland Blvd, Unit 830
Scottsdale, AZ 85254
Phone: 631.335.1582
Email: tw@grand-energy.com

Brian Willetts, CEO and Manager
15215 N Kierland Blvd, Unit 830
Scottsdale, AZ 85254
Phone: 631.603.4750
Email: bw@grand-energy.com

Tom Willetts, Vice President of Operations
15215 N Kierland Blvd, Unit 830
Scottsdale, AZ 85254
Phone: 631.335.1582
Email: tw@grand-energy.com

Exhibit A-13

Company History

Response:

Grand Energy, LLC (the "Applicant") is a Nevada limited liability company originally incorporated on December 26, 2019 for the purpose of marketing natural gas and electricity to retail customers. The Applicant's principle business interest is to become a Competitive Retail Natural Gas Supplier ("CRNG"), a Competitive Retail Electric Service Provider ("CRES") and Power Marketer ("Power Marketer") to residential, commercial and industrial customers.

Exhibit A-14

Secretary of State

Response:

Please see the attached evidence of registration with the Ohio Secretary of State.



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	CERT	COPY
01/17/2020	202001701582	REGISTRATION OF FOREIGN FOR PROFIT LLC (LFP)	99.00	100.00	0.00	0.00

Receipt

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

CORPORATION SERVICE COMPANY
251 LITTLE FALLS DRIVE
WILMINGTON, DE 19808

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, Frank LaRose
4422981

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

GRAND ENERGY, LLC

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

Document(s)

REGISTRATION OF FOREIGN FOR PROFIT LLC

Effective Date: 01/17/2020

Document No(s):

202001701582



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
17th day of January, A.D. 2020.

Ohio Secretary of State

Exhibit B-1

Jurisdiction of Operation

Response:

Grand Energy, LLC (the "Applicant") received its New Jersey natural gas and electric supplier license on August 12, 2020, under license numbers GE20040315L and EE20040316L. Additionally, on September 10, 2020, the Applicant received its Competitive Retail Natural Gas Service Provider Certificate under case number 20-1368-GA-CRS.

The Applicant's parent company, High Rise Energy Group, LLC is currently eligible to provide natural gas supply services to customers in the State of New York. High Rise Energy Group, LLC received its authorization from the New York Public Service Company on February 29, 2008.

Exhibit B-2

Experience & Plans

Response:

Experience:

Grand Energy, LLC (the "Applicant") was formed on December 26, 2019 and is not currently providing supply services in any territory. The principals and management teams of the Applicant are shared with the Applicant's parent company, High Rise Energy Group, LLC ("High Rise") which has decades of experience in energy marketing and service business, as well as experience in contracting process with customers. High Rise has successfully managed several energy companies as more fully documented in forward sections of this application.

Plans:

The Applicant intends to market to potential retail customers via direct marketing, telephone sales, broker channels, internet and other available methods as permitted by PUCO. The Applicant will bill customers through utility consolidated billing programs, unless it decides to bill the customer directly. Customer service related to billing inquiries or complaints will be handled via its toll-free telephone number. The call center hours are regular business hours Monday through Friday. The Applicant will fully comply with any and all Commission rules adopted pursuant to Section 4929.22 of the Ohio Revised Code.

Exhibit B-3

Disclosure of Liabilities and Investigations

Response:

Neither Grand Energy, LLC (the "Applicant") nor its parent company, High Rise Energy Group, LLC, have an 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 it is seeking to be certified to provide.

Exhibit B-6

Environmental Disclosure

Response:

Grand Energy, LLC will determine its generation resource mix, and environmental characteristics, including air emissions and radioactive waste from the system mix information published by PJM. Prior year mix information will be used as forecast for the upcoming year and adjusted as current information is published.

Exhibit C-1

Financial Reporting

Response:

As a privately held company, Grand Energy, LLC (the "Applicant") is not required to file with the Securities and Exchange Commission. The Applicant is not an SEC registrant, has no public issuances of debt or equity and, therefore, has no SEC reporting obligations. Quarterly and annual reports such as 10-K's, 8-K's, and 10-Q's are not applicable.

Similarly, the Applicant's parent company, High Rise Energy Group, LLC ("High Rise") is a privately held owned company and is not required to file with the Securities and Exchange Commission. High Rise is not an SEC registrant, has no public issuances of debt or equity and, therefore, has no SEC reporting obligations. Quarterly and annual reports such as 10-K's, 8-K's, and 10-Q's are not applicable.

CONFIDENTIAL

Exhibit C-2

Financial Statements

Response:

Grand Energy, LLC (the "Applicant") was formed in December 2019 and therefore does not have audited financial statements to provide. Nonetheless, attached please find officer certified financial statements for the two most recent years from the Applicant's parent company, High Rise Energy Group, LLC, reserved as confidential.

CONFIDENTIAL

Exhibit C-3

Forecasted Financial Statements

Response:

The enclosed Forecasted Financial Statement was prepared by:

David R. Behanna, CPA
DRB Consulting, Inc.
36 Mount Grey Road
Setauket, NY 11733
(631) 482-1725 (Direct)
(516) 790-4548 (Cell)
dave@drbcpapc.com

Reserved as Confidential

Exhibit C-4

Credit Rating

Not Rated

Exhibit C-5

Credit Report

Response:

Please find credit report for Applicant's parent company, High Rise Energy Group, LLC.

Exhibit C-6

Bankruptcy Information

Response:

Neither Grand Energy, LLC (the "Applicant") and its parent company, High Rise Energy Group, LLC ("High Rise"), nor any officer of the Applicant or High Rise, has filed for bankruptcy or reorganized. Further, neither the Applicant nor High Rise have sought protection from creditors.

Exhibit C-7

Merger Information

Response:

Neither Grand Energy, LLC (the "Applicant") nor its parent company, High Rise Energy Group, LLC ("High Rise") has experienced any dissolutions, mergers or acquisitions since each entity was formed.

Exhibit C-8

Corporate Structure

Response:

Grand Energy, LLC (the "Applicant") is a wholly-owned subsidiary of its parent company, High Rise Energy Group, LLC ("High Rise"). High Rise is a privately held company. Attached please find a corporate structure outlining the same.

Organizational
Chart

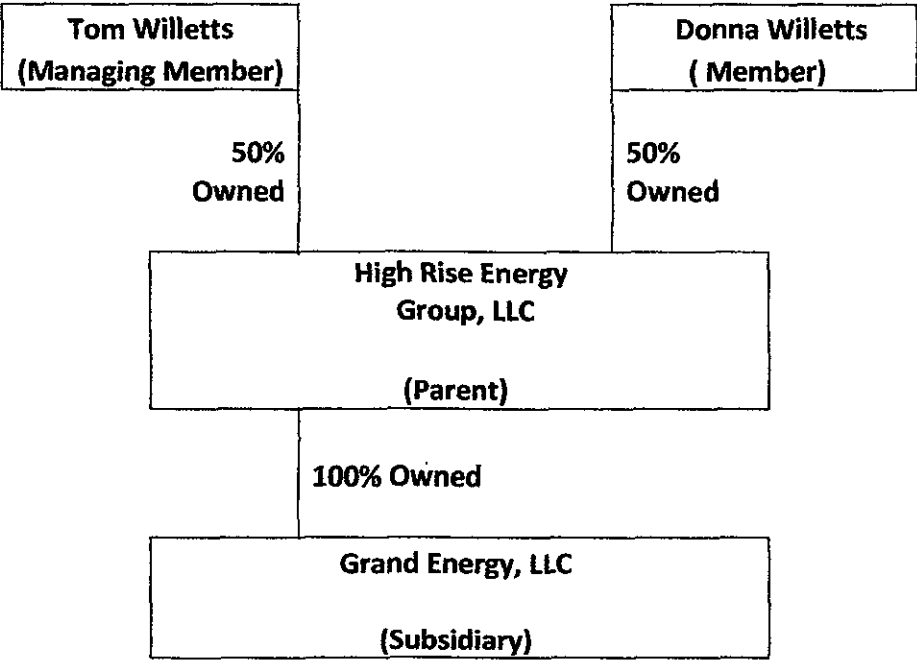


Exhibit C-9

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.)

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.**

Response:

Please see the attached correspondence from First Energy regarding financial obligations of Grand Energy, LLC.

Attachment D-1

Operations

Response:

Grand Energy, LLC (the "Applicant") operations will be managed through direct staff, consultants and service providers. As more fully described Exhibits B-2 and D-2, the expertise of the Applicant's principals ensures that it can fulfill all requirements of a Competitive Retail Electric Supplier ("CRES"). It has also contracted with leading edge service providers and consultants to ensure it can fulfill all requirements of a Competitive Retail Electric Supplier.

The Applicant does not generate power for retail sales nor does it schedule the delivery of electricity. The Applicant will purchase electricity on the PJM market, and will deliver it to retail customers through the LDU's. The Applicant plans to utilize consolidated billing and does not intend to be sending retail customers separate bills.

Attachment D-2

Operations Experience and Key Technical Personnel

Response:

The following is evidence of the Applicant's experience and technical expertise in performing the operations described in this application.

Applicant has contracted with David R. Behanna, CPA to provide financial and accounting services. Please see attached professional biography of Mr. Behanna, CPA.

The following people are key technical personnel for the Applicant and have expertise in performing the operations described in the application. Additionally, the Applicant's parent company shares employee resources and has expertise as an authorized energy supplier and has served residential and small commercial customers.

Brian Willetts, CEO and Manager
15215 N Kierland Blvd, Unit 830
Scottsdale, AZ 85254
Phone: 631.603.4750
Email: bw@grand-energy.com

Tom Willetts, Vice President of Operations
15215 N Kierland Blvd, Unit 830
Scottsdale, AZ 85254
Phone: 631.335.1582
Email: tw@grand-energy.com

Please see the attached background information for Brian Willetts and Tom Willetts.

Additionally, the Applicant has retained the following as legal counsel as an advisor on regulatory markets:

Natara G. Feller
Title: Outside Counsel
Company: Feller Law Group, PLLC
Email: natarafeller@feller.law
Telephone: 212.590.0145

Ms. Feller and her team of regulatory specialists advise clients on regulatory, transactional, compliance and enforcement matters involving the Federal Energy Regulatory Commission (FERC) and state utility commissions. Ms. Feller's experience includes:

- Regulatory compliance obligations under the FPA, PURPA, PUHCA, NGA, NGPA, EPAct 2005 and state statutes
- Participation in organized markets and ISO/RTO governance
- Preparation of all manner of responsive agency pleadings, including rehearing applications, briefs, comments, testimony, protests and motions, natural gas tariff filings, QF and EWG self-certifications and market-based rate applications

Ms. Feller is licensed to practice law in New York, New Jersey and the District of Columbia.

The Feller Law team has experience before PUCO and advising CRES on energy regulatory and consumer protection issues. As required, Ms. Feller will work with local Ohio-barred counsel on legal matters.

Finally, the Applicant will be utilizing EC Infosystems for its EDI services.

Ananda Goswami
Title: Vice President
Company: EC Infosystems
Email: AGoswami@ecinfosystems.com
Telephone: 516.874.8011

Thomas M. Willetts

15215 N Kierland Blvd
Unit 830
Scottsdale, AZ 85254
tw@highriseenergyllc.com
(631) 355-1582

Education

CW Post

B.S. Marketing

Experience

Founder/President

High Rise Energy Group, LLC February 2008 – Present

- Responsible for overall operational & sales policies & strategies.
- Responsible for getting High Rise Energy authorized and contracted with three utilities in NY in 2008 (Con Edison, National Grid East and National Grid West).
- Oversees all aspects of the day to day business, including management, financial and administrative activities, while growing a sales force to over 200 outside sales agents.
- Grew High Rise Energy to over \$70 million a year in sales.
- Over ten years of experience working with the NAESB rules and practices.
- Educating staff on industry trends and dynamics of energy deregulation.

Co-Founder/Vice President of Operations

Grand Energy, LLC December 2019 – Present

- Responsible for overall operational & sales policies & strategies, while growing a salesforce.
- Oversees all aspects of the day to day business, including management, financial and administrative activities, such as daily EDI processing.

Founder/President

Regal Benefits Insurance Agency Inc. July 1997 – Present

- Developing policies & procedures for company production.
- Generation of business in the B2B marketplace.

District Sales Manager

Oxford Health Plans October 1992 - 1997

- Responsible for sales force production.
- Departmental budgetary responsibility.

Brian Willetts

15215 N Kierland Blvd
Unit 830
Scottsdale, AZ 85254
bw@grand-energy.com
(631) 603-4750

Education

Notre Dame

B.S. Business

Co-Founder/CEO

Grand Energy, LLC December 2019 – Present

- Responsible for overall operational & sales policies & strategies, while growing and training a salesforce.
- Oversee all aspects of the day to day business, including management, financial and administrative activities, such as daily EDI processing.

Experience

General Manager

High Rise Energy Group, LLC May 2016 – Present

- Assists in overall operational & sales policies & strategies.
- Assists in all aspects of the day to day business, including management, financial and administrative activities, such as daily EDI processing.
- Assisted in growing High Rise Energy to over \$70 million a year in sales.
- Over three years of experience working with the NAESB rules and practices.
- Educating staff on industry trends and dynamics of energy deregulation.

David R. Behanna, CPA

(Professional Biography)

Professional Background:

Certified Public Accountant in New York State since 1983
Coopers & Lybrand (Now Price Waterhouse Coopers) 1981 – 1986
Partner in several Long Island based CPA firms 1987 – 1997
Owner of DRB Consulting, Inc. 1997 – Current
ESCO Client Specialization and Concentration Since 2008

Specific Experience in the ESCO Marketplace:

In-depth knowledge of the EDI and related operational software packages.
Extensive experience with commodity supply agreements for both Electric and Natural Gas.
Access to third party providers for load management, scheduling and nominations.
Maintaining client books and records utilizing QuickBooks Accounting Software.
Various calculations of Unbilled Revenue for both Electric and Natural Gas.

Services Provided:

Outsource accounting and tax services
Various management consulting services
Source and negotiate structured working capital financing.
Merger and acquisition consulting and negotiation.

Current and Former ESCO Client List:

High Rise Energy Group
Maximum Power & Gas
Lexington Power & Light
North Energy
North Energy Power
Switch Energy
Chief Energy Power
Chief Energy Gas
Definite Energy Group
Atlantic Energy
East Coast Power & Gas
Greenlight Energy
ABest Power & Gas
Harborside Energy
Brown's Fuel Service
Brown's Energy Services
Premier Empire Energy
Big Sky Gas
City Power and Gas
Flanders Energy

Attachment D-3

FERC Power Marketer Authorization

Response:

The FERC docket granting Grand Energy, LLC power marketer authority is
Docket No.: ER20-2726-000