



DIS Case Number: 19-1340-EL-AGG

NOTICE OF MATERIAL CHANGE

Certified Competitive Retail Electric Service Provider:

Date: 10/25/2020

Case Number:

19-1340-EL-AGG Certificate Number: 19-1417E

Pursuant to Rule 4901:1-24-11 of the Ohio Administrative Code, the above-referenced entity has submitted the following documents or information as notification of a material change to the information supplied in its application for certification or certification renewal.

Exhibit A-5: Contact person for regulatory matters

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

Exhibit A-12: Principal officers, directors and partners

Exhibit B-1: Jurisdictions of operations

Exhibit B-4: Disclosure of consumer protection violations

Exhibit B-6: Environmental disclosures



**Public Utilities
Commission**

Submitted by: Naman Trivedi

A-5. Contact person for regulatory matters

Naman Trivedi
227 Bellevue Way NE #871
Bellevue, WA 98004
US
regulatory@wattb.com
4085823432

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

Phone: (866) 928-8289 **Extension (if applicable):** **Country:** United States
Fax: (408) 608-2847 **Extension (if applicable):** **Street:** 227 Bellevue Way NE #871
Email: support@wattb.com **City:** Bellevue **Province/State:** WA
Postal Code: 98004-5721

A-12. Principal officers, directors, and partners

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

Name	Email	Title	Address
Naman Trivedi	regulatory@wattb.com		227 Bellevue Way NE #871 Bellevue, WA 98004 US

Section B: Applicant Managerial Capability and Experience

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..



File Attached

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?

No

B-6. Environmental disclosures

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.

PJM disclosure option chosen

[Section C: Applicant Financial Capability and Experience](#)

[Section D: Applicant Technical Capacity](#)



Public Utilities
Commission

Application Attachments



Exhibit B-1, Jurisdictions of Operation October 2020 Update

October 12, 2020

Docket No. 19-1340-EL-AGG
License No. 19-1417E

From: Naman Trivedi
WattB, Inc.
Bellevue Way NE, #871
Bellevue, WA, 98004

In order to keep the PUCO updated on WattB, Inc.'s regulatory activities, please see the following updated list of jurisdictions our company is licensed to do business in. Please note that the WattB, Inc. Pennsylvania license is currently suspended, as noted in Attachment B-4, and WattB, Inc. will file additional information as it becomes available.

State	Type of License	License No.	Docket/Case
OH	Power Broker (license awarded July, 2019)	19-1417E (1)	19-1340-EL-AGG
TX	Broker (interim; license awarded August, 2019)	BR190231	
NJ	Energy Agent (license awarded September, 2019)	EA-0584	
MA	Electricity Broker (license awarded September, 2019) EB-490	EB-490	
PA	Power Broker (license awarded December, 2019)	N/A	A-2019-3012205
NH	Electric Load Aggregator (license awarded October, 2019)	DM 19-169	
IL	Broker (license awarded December, 2019)	N/A	19-0973
ME	Competitive Electricity Provider (Broker) (license awarded September 2019)	N/A	2019-00188
DE	Electric Supplier, to broker Electric Supply Service (license awarded June 2020)	N/A	20-0154
RI	No license required (intend to begin operations in 2020)		
NY	No license required		
CT	No license required		

Naman Trivedi
CEO, WattB, Inc.
regulatory@wattb.com
(408) 582-3432

PUCO Exhibit B-6.2: WattB Communication with PA PUC

wattbuy

September 24, 2020

Docket No. A-2019-3012205

Utility Code 1122499

PETITION FOR RECONSIDERATION

To: Pennsylvania Public Utility Commission Secretary
400 North Street, Keystone Building
Harrisburg, PA 17120

Naman Trivedi
CEO and Co-Founder
227 Bellevue Way NE #871
Bellevue WA, 98004-5721

RE: PETITION FOR RECONSIDERATION

On September 17, the Pennsylvania PUC issued an order which revoked WattB, Inc.'s electric broker license in the state of Pennsylvania. WattB, Inc. would hereby like to submit a Petition for Reconsideration and communicate that the perceived noncompliance with 52 Pa. Code §54.42(a) was derived from a misunderstanding: WattB, Inc. renewed and retained its financial security in compliance with 52 Pa. Code § 54.40 with Great American Insurance within the proper timeframe, on June 17, 2020. WattB, Inc. was under the impression that this bond renewal would be communicated to the PUC automatically through the Insurance company, and did not take direct action to communicate this action with the PUC in accordance with the law. Furthermore, WattB, Inc. employees missed the Initial Order filed in docket no. A-2019-3012205. This lack of attention led to unintentional noncompliance. Our leadership would like to apologize sincerely for the miscommunication and improper conduct.

WattB, Inc. would like to submit this Petition alongside the qualified bond, which was properly obtained in June 2020, to demonstrate compliance with Pennsylvania law. **The bond will be mailed to the PUC and filed as "Confidential."** Also of note, WattB, Inc. has not yet conducted business in Pennsylvania, but had plans to initiate business in Q4 2020. Our company, which has weathered the impacts of COVID-19 like many others, would sincerely appreciate the opportunity to pay an appropriate fee in order to re-instate our PUC license and offer our service for the first time in Pennsylvania. This is also WattB, Inc.'s first experience renewing PUC applications, and this lesson is not taken lightly. We are confident that permission to re-instate the PUC license will allow WattB, Inc. to continue to offer customers an opportunity to save money and gain insights into the energy choices they make. Furthermore, WattB, Inc. intends to perform a deep review of Pennsylvania code to ensure continued compliance.

Thank you for your time and consideration,



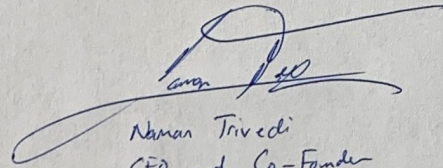
09/25/2020

Naman Trivedi
CEO and Co-Founder
WattB, Inc.

I, Naman Trivedi, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Statement of Verification

I, Naman Trivedi, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Naman Trivedi
CEO and Co-Founder
WattB, inc

09/25/2020

PUCO Exhibit B-6.3: WattB Communication with PA PUC

wattbuy

September 30, 2020
Docket No. A-2019-3012205
Utility Code 1122499
Application Update - Renewed Bond

To: Pennsylvania Public Utility
Commission Secretary
400 North Street, Keystone Building
Harrisburg, PA 17120

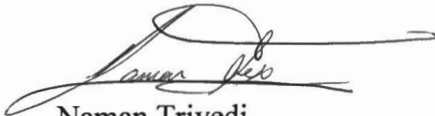
Naman Trivedi
CEO and Co-Founder
227 Bellevue Way NE #871
Bellevue WA, 98004-5721

RE: APPLICATION UPDATE/REVISION - RENEWED BOND

On September 24, WattB, Inc. submitted a Petition for Reconsideration in order to update the Pennsylvania PUC with its active bond information, in compliance with 52 Pa. Code §54.42(a). WattB, Inc. sent in the information relating to the active bond with Great American Insurance Co., acquired in June 2020. Due to PUC action, this bond was canceled. WattB, Inc. initiated a new bond with Platte River Insurance Co., bond number PR271858, on September 30, 2020.

WattB, Inc. will submit the current, original sealed bond with a copy of the compliant, renewed bond from June 2020 via mail in accordance with PUC confidential document procedures. WattB, Inc. hopes that this information proves a sincere effort to remain in compliance with the Pennsylvania PUC.

Thank you for your time and consideration,

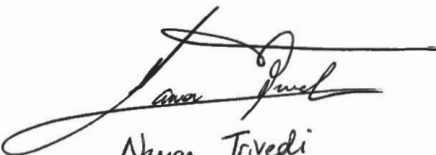


Naman Trivedi
CEO and Co-Founder
WattB, Inc.

9/30/20

Statement of Verification

I, Naman Trivedi, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).


Naman Trivedi
9/30/20



October 12, 2020

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

From: Naman Trivedi
WattB, Inc.
Bellevue Way NE, #871
Bellevue, WA, 98004

Docket No. 19-1340-EL-AGG
License No . 19-1417E

RE: Material Change and Notification

In compliance with Ohio Administrative Code 4901:1-24-11, WattB, Inc. dba Wattbuy hereby submits a request to change its broker registration information with the PUCO. WattB requests to implement the following changes:

- 1) For application question A-5, Contact person for regulatory or emergency matters, please change the **e-mail** to regulatory@wattb.com and the **business address** to 227 Bellevue Way NE #871, Bellevue WA 98004-5721 (this is the same as WattB Inc.'s principal business address).
- 2) For application question A-7, Applicant's address and toll-free number for customer service and complaints, please change the **e-mail** to support@wattb.com and the **business address** to 227 Bellevue Way NE #871, Bellevue WA 98004-5721.
- 3) For application attachment A-12, Principal Officers, Directors & Partners, please reflect the new **address** of our CEO, Naman Trivedi, to 377 E 33rd St., Apartment 18F, New York, New York, 10016.
- 4) For application attachment B-1, please reflect the updated list of jurisdictional activities.

In addition to these material changes, WattB Inc. would like to inform the PUCO of regulatory action taken against the company in Pennsylvania. WattB, Inc. has attached a revised Attachment B-4/B-6, October 2020 Update to explain this action. WattB, Inc. is actively working with the Pennsylvania Public Utility Commission to resolve this action and will keep the PUCO updated on future actions.

Thank you for your service and assistance,

A handwritten signature in black ink, appearing to read 'Naman Trivedi'.

Naman Trivedi
CEO, WattB, Inc.
naman@wattb.com
(408) 582-3432



**Exhibit B-4 / B-6 Disclosure of Liabilities and Investigations/ Certification
Denial Curtailment Suspension, or Revocation
October 2020 Update**

October 12, 2020

From: Naman Trivedi

WattB, Inc.

Bellevue Way NE, #871

Bellevue, WA, 98004

Docket No. 19-1340-EL-AGG

License No. 19-1417E

In compliance with Ohio Administrative Code 4901:1-24-11, WattB, Inc (WattB). would like to inform the PUCO of a regulatory action taken against WattB in Pennsylvania.

On September 17, 2020, the Pennsylvania PUC issued an order which revoked WattB's electric broker license in the state of Pennsylvania because WattB did not file its \$10,000 bond renewal with the Commission. According to the Commission's records, WattB's bond expired on June 17, 2020. On September 24 and October 1, WattB filed information confirming that it had complied with Pennsylvania 52 Pa. Code § 54.40 by renewing its bond with Great American Insurance within the proper timeframe, on June 17, 2020. WattB was under the impression that this bond renewal would be communicated to the PUC automatically through the insurance company, and did not take direct action to communicate with the PUC. WattB responded to the order by obtaining a new bond with Platte River Insurance Co., bond number PR271858, on September 30, 2020. This bond was mailed overnight to the PUC when received on October 1. The response of the PUC is pending, and WattB intends to keep the PUCO abreast of all developments.

Of note, WattB, Inc. has not yet conducted business in Pennsylvania, but has plans to initiate business in Q4 2020. WattB has also not started operations in Ohio but intends to in the near future. The clerical error made in Pennsylvania was during WattB's first year operating as a broker in Pennsylvania, and WattB intends to perform a deep review of Pennsylvania and other state code to ensure continued compliance.

Please also note that this action modifies the PUCO broker application question B-6 to "yes." A copy of the PUC order and WattB, Inc.'s response is attached to this filing. If the PUCO would like a copy of the Pennsylvania bonds, please contact WattB staff.

Naman Trivedi

CEO, WattB, Inc.

naman@wattb.com

(408) 582-3432

PUCO Exhibit B-6.1: PA PUC Order

PENNSYLVANIA PUBLIC UTILITY COMMISSION Harrisburg, PA 17120

Electric Generation Supplier License Cancellations of
Companies with an Expired Financial Security

M-2020-3015227

FINAL ORDER

On July 16, 2020, a Tentative Order was entered in the above captioned proceeding.

The Electric Generation Suppliers (EGS) listed in Table 1 below filed approved financial securities within 45 days after publication in the *Pennsylvania Bulletin*.

Table 1 - EGSs with Approved Financial Security

Below are the EGS licensees that provided the required approved financial security.

<u>Docket Number</u>	<u>Company Name</u>
A-2016-2575063*	FREEPOINT ENERGY SOLUTIONS LLC
A-2016-2579236	TRIANGLEENERGY LLC

*taking title to electricity

The EGSs listed in Table 2 below failed to file any adverse public comments or approved security within 45 days after publication in the *Pennsylvania Bulletin*.

Table 2 - EGSs without Approved Financial Security

Below are the EGS licensees that failed to provide the required approved financial security.

<u>Docket Number</u>	<u>Company Name</u>
A-2016-2575177	NATIONAL UTILITIES REFUND LLC
A-2014-2457160	NORESCO LLC
A-2019-3012205	WATTB INC

The Commission's regulations at 52 Pa. Code §54.42(a) require that a licensee shall comply with the applicable requirements of the code and Commission regulations and orders. Consistent with due process, a license may be suspended or revoked, and fines may be imposed

against the licensee for failure to furnish and maintain a bond or other security approved by the Commission in the amount directed by the Commission.

The Tentative Order has become FINAL by operation of law. The Electric Generation Supplier Licenses held by the companies listed in Table 2 are cancelled, and shall be stricken from all active utility lists maintained by the Commission's Bureau of Technical Utility Services, Secretary's Bureau, and the Assessment Section of the Bureau of Administration, and shall be removed from the Commission's website, and notifications be sent to all electric distribution companies in which the Electric Generation Supplier is licensed to do business. Additionally, if there are no outstanding claims against the cancelled companies 60 days after the service date of this Final Order, the Secretary's Bureau shall return each cancelled company's financial security instruments.

THE COMMISSION,

BY

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is fluid and cursive, with the first name "Rosemary" being larger and more prominent than the last name "Chiavetta".

Rosemary Chiavetta
Secretary

ORDER ENTERED: September 23, 2020

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/25/2020 8:24:13 PM

in

Case No(s). 19-1340-EL-AGG

Summary: In the Matter of the Application of WattB, Inc