



DIS Case Number: 11-5466-EL-CRS

Section A: Application Information

A-1. Provider type:

☐ Power Broker ☐ Aggregator ☐ Retail Generation Provider ☒ Power Marketer

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

Legal Name: ENGIE Retail LLC **Country:** United States
Phone: 7136360000 **Extension (if applicable):** **Street:** 1990 Post Oak Blvd., Suite 1900
Website (if any): www.mythinkenergy.com **City:** Houston **Province/State:** TX
Postal Code: 77056

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	Type	Address	Active?	Proof
Think Energy	DBA	1360 Post Oak Blvd., Suite 400 Houston, TX 77056	Yes	File

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

Provide all business names the applicant uses in North America, including the names provided in A-2 and A-3.

Name	Type	Address	Active?	Proof
Think Energy	DBA	1360 Post Oak Blvd., Suite 400 Houston, TX 77056	Yes	File

A-5. Contact person for regulatory matters



Public Utilities Commission

Marsha Griffin
1360 Post Oaks Blvd Ste 400
Houston, TX 77056
US
marsha.griffin@engie.com
7136361083

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

Shane Puskar
1360 Post Oak Blvd., Suite 400
Houston, TX 77056
US
shane.puskar@engie.com
7136361176

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

Phone: 8889233633	Extension (if applicable):	Country: United States
Fax:	Extension (if applicable):	Street: 1360 Post Oak Blvd., Suite 400
Email: customercare@mythinkenergy.com		City: Houston
		Province/State: TX
		Postal Code: 77056

A-8. Applicant's federal employer identification number

35-2408190

A-9. Applicant's form of ownership

Form of ownership: Limited Liability Company (LLC)

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
DP&L

Duke Energy Ohio
FirstEnergy - Cleveland Electric Illuminating
FirstEnergy - Ohio Edison
FirstEnergy - Toledo Edison

Class of customer selection

Commercial
Residential

A-11. Start date

Indicate the approximate start date the applicant began/will begin offering services: 07-01-2015

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
Sayun Sukduang		President & Chief Operating Officer	1360 Post Oak Blvd, Ste 400 Houston, TX 77056 US
Ray Cunningham	ray.cunningham@engie.com	Vice President, General Counsel & Secretary	1360 Post Oak Blvd., Suite 400 Houston, TX 77056 US
Graham Leith	graham.leith@engie.com	Senior Vice President & Chief Operating Officer	1360 Post Oak Boulevard, Suite 400 Houston, TX 77056 US
Bill Jordan	bill.jordan@engie.com	Vice President, Natural Gas Supply	1360 Post Oak Blvd, Suite 400 Houston, TX 77056 US

A-13. Company history

Think Energy markets to and sells electric energy supply in the competitive retail market to residential and small commercial customers in the State of Ohio, in the following utility territories: Cleveland Electric Illuminating, Ohio Edison, Toledo Edison, Dayton Power & Light, AEP Ohio, and Duke Energy Ohio. Think Energy offers fixed-price electric energy products to customers. Think Energy's marketing initiative in the Ohio retail small commercial and residential markets consists of: (i) online direct enrollment; and (ii) non-dedicated sales



channels such as a broker that functions as a customer representative and solicit products and services from Think Energy, as well as other supplies, on the customer's behalf.

A-14. Secretary of State

Secretary of State Link:

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-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.

File(s) attached

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..

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-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?

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.

File(s) attached

Section C: Applicant Financial Capability and Experience

C-1. Financial reporting

Provide a current link to the most recent Form 10-K filed with the Securities and Exchange Commission (SEC) or upload 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.

Financial Reports Link(s): Think Energy and its ultimate parent company are not publicly traded companies. Think Energy is a wholly-owned sole member-managed subsidiary of ENGIE Resources, who is a wholly-owned subsidiary of ENGIE Holdings Inc., who is a wholly-owned



Public Utilities Commission

subsidiary of ENGIE S.A. (collectively the ENGIE Group). The most recent annual financials of the ENGIE Group can be found at www.engie.com/en/finance/results/2020.

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.

Preferred to file this information confidentially

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.



Preferred to file confidentially

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'.

This does not apply

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.

Preferred to file this information confidentially

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?

- Applicant
- Parent company of the applicant
- Affiliate company that guarantees the financial obligations of the applicant
- Any owner or officer of the applicant

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?

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.

File(s) attached

C-9. Financial arrangements

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:

1. 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.
2. 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.
3. 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



Public Utilities Commission

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.

4. 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).

Preferred to file confidentially

Section D: Applicant Technical Capacity

D-1. Operations

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.

File(s) attached

D-2. Operations Expertise & Key Technical Personnel

Given the operational nature of the applicant's business, provide evidence of the applicant's experience and technical expertise in performing such operations. Include the names, titles, e-mail addresses, and background of key personnel involved in the operations of the applicant's business.

File(s) attached

D-3. FERC Power Marketer and License Number

Provide a statement disclosing the applicants FERC Power Marketer License Number (Power Marketers Only).

ER16-582-001



Public Utilities
Commission

Application Attachments

UNITED STATES OF AMERICA
STATE OF OHIO
OFFICE OF THE SECRETARY OF STATE

I, Frank LaRose, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show ENGIE RETAIL, LLC, a Delaware For Profit Limited Liability Company, Registration Number 2018277, filed on May 4, 2011, is currently in FULL FORCE AND EFFECT upon the records of this office.



Witness my hand and the seal of the Secretary of State at Columbus, Ohio this 5th day of August, A.D. 2021.

A handwritten signature in cursive script, reading "Frank LaRose".

Ohio Secretary of State

Validation Number: 202121702134

ENGIE RETAIL, LLC d/b/a THINK ENERGY
2021 Renewal Application for Retail Generation Providers and Power Marketers

Exhibit B-1 – “Jurisdiction of Operation”

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 or retail/wholesale electric service as of the date of filing of this application.

Think Energy’s electric supplier jurisdictions are as follows:

STATE OF LICENSE	LICENSE NO.	LICENSE ISSUE DATE
Connecticut	Docket #11-10-14	02/09/2012
Delaware	Docket #11-482	04/17/2012
District of Columbia	Order # 16630	12/02/2011
Illinois	ICC Cert. No. 11-0531	09/21/2011
Maine	Docket #2011-425	11/22/2011
Maryland	License #IR-2404	08/17/2011
Massachusetts	License # CS-087	08/10/2011
New Hampshire	Docket #DM 15-490	12/28/2015
New Jersey	License # ESL-0120	03/12/2012
New York	(NY does not issue license #)	09/16/2011
Ohio	Certificate #11-407E(1)	11/17/2011
Pennsylvania	License No. A-2011-2268361	12/16/2011
Rhode Island	Docket #D-96-6(R7)	09/11/2015
Texas	License #10204	08/26/2011
Virginia	License #G-52	12/14/2018

Think Energy’s natural gas supplier jurisdictions are as follows:

STATE OF LICENSE	LICENSE NO.	LICENSE ISSUE DATE
Illinois	Certificate No. 16-0391	09/22/2016
Maryland	License #IR-3794	02/08/2017
New Jersey	License #GSL-0169	03/24/2017
New York	ESCO Code: THNK	02/01/2017
Ohio	Certificate #15-479G(1)	11/22/2015

ENGIE Resources LLC’s (hereinafter “ENGIE Resources”), the parent company of Think Energy, electric service jurisdictions are as follows:

STATE OF LICENSE	LICENSE NO.	LICENSE ISSUE DATE
Connecticut	Docket #04-06-11	09/29/2004
Delaware	Docket #04-325	11/23/2004
District of Columbia	Order # 13472	01/05/2005
Illinois	ICC Cert. No. 17-0163	05/03/2017



STATE OF LICENSE	LICENSE NO.	LICENSE ISSUE DATE
Maine	Docket #2003-120	03/14/2003
Maryland	License #IR-605	03/21/2004
Massachusetts	License # CS-037	05/15/2002
New Hampshire	Docket #DM 15-468	12/11/2015
New Jersey	License # ESL-0061	08/06/2003
New York	(NY does not issue license #)	09/13/2004
Ohio	Certificate #04-118	08/10/2004
Pennsylvania	License No. A-110156	07/18/2002
	Name Change Approved:	02/22/2017
Rhode Island	Docket #D-96-6(P2)	10/25/2004
Texas	License # 10053	08/05/2003

ENGIE Resources' natural gas supplier jurisdictions are as follows:

STATE OF LICENSE	LICENSE NO.	LICENSE ISSUE DATE
Illinois	Certificate No. 18-0365-EL	03/21/2018
New Jersey	License #GSL-0207	03/13/2019
New York	ESCO Code: SUEZ	03/19/2018
Ohio	Certificate No. 17-2450-GA	03/29/2018
Pennsylvania	Docket No. A-2018-3002116	10/04/2018
Virginia	License #G-52	12/14/2018



ENGIE RETAIL, LLC d/b/a THINK ENERGY
2021 Renewal Application for Retail Generation Providers and Power Marketers

Exhibit B-2 – “Experience & 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 4929.22 of the Ohio Revised Code.

See Exhibit A-13 attached hereto.



ENGIE RETAIL, LLC d/b/a THINK ENERGY
2021 Renewal Application for Retail Generation Providers and Power Marketers

Exhibit B-6 – “Environmental Disclosure”

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.

As a Power Marketer, Think Energy has not and will not generate power. Think Energy will continue to comply with the mandated RPS guidelines and procedures dictated by the Ohio Public Utilities Commission. Think Energy plans to achieve this by acquiring and retiring the necessary RECs to fulfill annual compliance obligations set by the Public Utilities Commission.

ENGIE RETAIL, LLC d/b/a THINK ENERGY
2021 Renewal Application for Retail Generation Providers and Power Marketers

Exhibit 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.

In 2017 in Maine, Think Energy was instructed to stop marketing in a utility service area that was not included in Think Energy’s original license application. For clarification purposes, there are two utilities with “Bangor” in the name; Think Energy was only licensed in one of the Bangor utilities. The error was due to incorrect zip codes in Think Energy’s systems which was rectified within one day of the Commission’s notice to Think Energy.

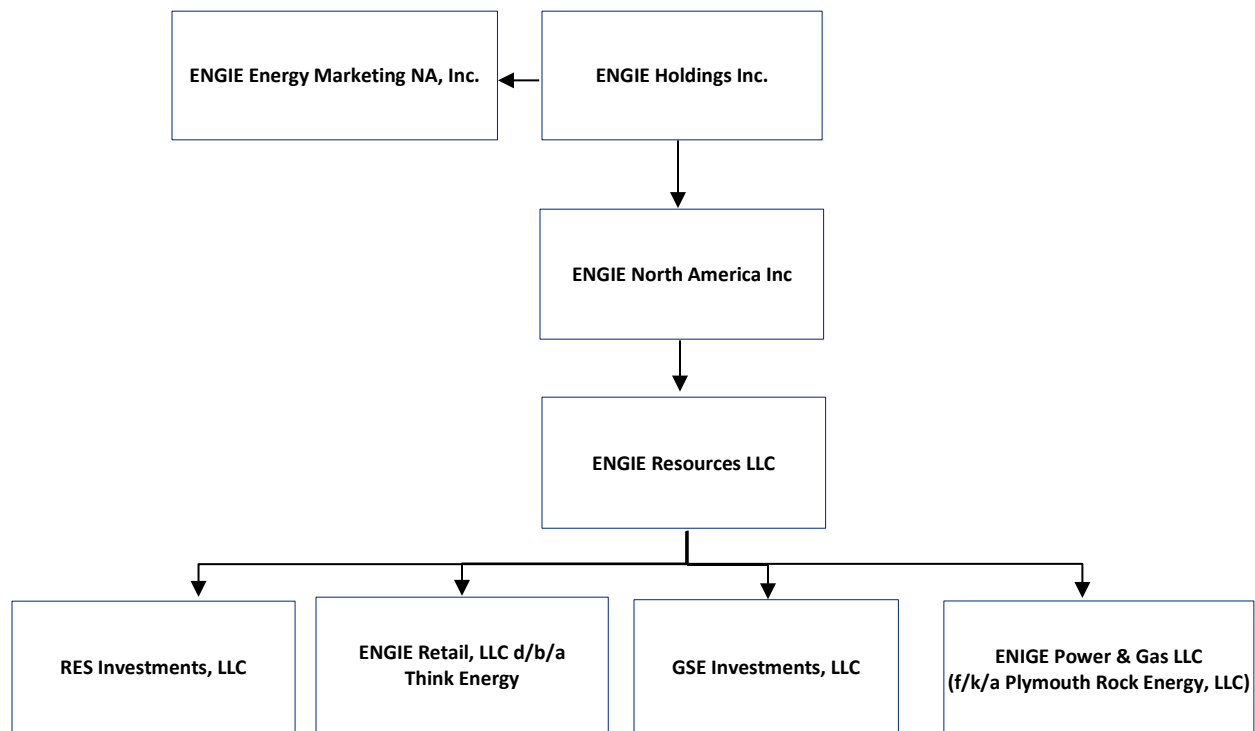
In Ohio in 2017, a staff member instructed Think Energy to cease natural gas marketing. The Commission’s instruction was lifted, and Think Energy resumed natural gas marketing services in Ohio.

As stated in Think Energy’s 2019 license renewal package, in Ohio in 2018, Think Energy was required by PUCO to cease door-to-door marketing as a result of a regulation misinterpretation. Think Energy mistakenly understood that the PUCO rules specifically addressing door-to-door sales completely covered all consent requirements. Think Energy did not interpret the regulations to include the general rules for mailing, facsimiles and direct enrollments to be in addition to the door-to-door rules. Due to this misunderstanding, Think Energy believed that its’ obtaining third party verifications for all door-to-door sales was sufficient. Think Energy acknowledged its good faith mistake and corrected the mistake to be in compliance with the regulation, and the matters raised by staff were fully addressed to the satisfaction of PUCO.

ENGIE RETAIL, LLC d/b/a THINK ENERGY
2021 Renewal Application for Retail Generation Providers and Power Marketers

Exhibit C-8 – “Corporate Structure”

Provide a graphical depiction of the applicant’s corporate structure. Do not provide an internal organization 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 applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.



ENGIE Resources LLC	Supplies Commercial & Industrial Retail Electricity & Natural Gas
ENGIE Retail, LLC d/b/a Think Energy	Supplies Residential & Small Commercial Retail Electricity & Natural Gas
ENGIE Power & Gas, LLC	Supplies Retail Electricity & Natural Gas
ENGIE Energy Marketing NA, Inc.	Supplies Wholesale Electricity



ENGIE RETAIL, LLC d/b/a THINK ENERGY
2021 Renewal Application for Retail Generation Providers and Power Marketers

Exhibit D-2 – “Operations Expertise & 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, email addresses, telephone numbers and background of key personnel involved in the operational aspects of the applicant’s business.

See Exhibit B-2 and below:

Sayun Sukduang

President & CEO

1360 Post Oak Blvd, Suite 400

Houston, TX 77056

T: 713-636-0000

Sayun Sukduang is the President and CEO of ENGIE Retail, LLC d/b/a Think Energy (“Think Energy”), serving residential and small commercial customers which is a subsidiary of ENGIE Resources LLC (“ENGIE”) serving small commercial, commercial and industrial customers, who in turn is a subsidiary of ENGIE North America, Inc. (“ENA”). ENGIE is active in the development, acquisition, and operation of electricity and cogeneration facilities, the marketing and sales of products and services, and the import and distribution of natural gas and LNG. Mr. Sukduang joined ENA in 2000 and has held executive level positions in Mergers and Acquisitions, Energy Infrastructure Development, Commodity Trading, Operations and Engineering. Mr. Sukduang has over 20 years of experience in the energy industry and serves as a board member of C2C Power, one of Canada’s largest renewable energy companies, and TagSur Pipelines, a mid-stream pipeline company in Mexico. Mr. Sukduang holds a Bachelors of Science in Mechanical Engineering and a Masters of Business Administration.

Graham Leith

Senior Vice President & Chief Operating Officers

1360 Post Oak Blvd, Suite 400

Houston, TX 77056

T: 713-636-1707

Email: graham.leith@engie.com

Mr. Leith joined ENGIE in May 2014 as Vice President, Sales and then became Senior Vice President and Head of Retail and is currently Chief Operating Officer for both ENGIE and Think Energy. He has over 20 years of experience in the energy industry, with 16 years in retail energy in the areas of Sales, Marketing, Risk Management and Operations. Mr. Leith has demonstrated over five years’ natural gas sales experience and over nine years’ experience working with the rules and practices established by the NAESB. He previously held the positions of Chief Risk Officer and Vice President & General Manager, Commercial Energy Sales, at AEP Energy. Prior to AEP, Graham held senior positions with Direct Energy & British Gas (Centrica plc), Ontario Power Generation Inc., and Photowatt Solar, in Canada and the United Kingdom. Mr. Leith has also held various energy marketing and sales roles with PremStar Energy Inc., TransCanada Pipelines, Ltd., and Air Solutions, Inc., in Ontario, Canada. Mr. Leith holds a Master of Business Administration from the Schulich School of Business at York University in Toronto, Ontario,

Canada and a Bachelor of Business Administration from Wilfrid Laurier University in Waterloo, Ontario, Canada.

Ray Cunningham

General Counsel & Secretary
1360 Post Oak Blvd, Suite 400
Houston, TX 77056
T: 713-636-1980
Email: ray.cunningham@engie.com

Mr. Cunningham joined ENGIE in October 2012 as its Vice President & General Counsel where he is responsible for government affairs, regulatory compliance, corporate transactions, litigation, risk management, and all legal matters impacting the retail business. Mr. Cunningham has over 25 years of experience in the energy industry and was most recently Vice President & Assistant General Counsel of the wholesale gas and power business unit of ENA. Mr. Cunningham is a graduate of Texas Tech University and South Texas College of Law.

Bill Jordan

Vice President, Natural Gas Supply
1990 Post Oak Blvd, Suite 1900
Houston, TX 77056
T: 713-636-1622
F: 713-636-1601
Email: bill.jordan@engie.com

Mr. Jordan joined ENGIE in March 2015 and is responsible for pricing, and portfolio risk management. He has over 20 years of experience and brings a broad background in energy marketing, portfolio management, wholesale generation and retail operations, valuation, risk management, and structuring to the role. He joined ENA in 2004 and has held roles in retail operations and wholesale marketing. Prior to ENGIE, he was Director, ERCOT Portfolio Management and responsible for all commercial operations of the ERCOT generation portfolio including budget year term hedging, and day-ahead and real-time optimization. During his career, he held various retail commodity structuring and risk management roles with Centrica, Reliant Resources, Enron, Duke, and Central & Southwest, including developing hedging strategies for retail load obligations and risk management of supply positions. He holds an electric engineering degree from Louisiana Tech.

ENGIE RETAIL, LLC d/b/a THINK ENERGY
2021 Renewal Application for Retail Generation Providers and Power Marketers

Exhibit D-1 – “Operations”

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 delivery, the provision of ancillary services, as well as other services used to arrange for the purchase and delivery of electricity to retail customers.

Think Energy’s operations include the retail power supply and other retail ancillary services used to arrange for the purchase and delivery of electricity to small commercial retail and residential customers. Think Energy does not generate power and does not own any generation facilities.

Think Energy’s parent company, ENGIE Resources, is also a licensed, active electric supplier in the retail marketplace in Connecticut, Delaware, District of Columbia, Illinois, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Texas and Virginia. Think Energy has access to shared services, support and oversight by its parent company for day-to-day technical, managerial and operational activities, including risk management; legal counsel services; contract administration services; accounting and finance services; general management services; transaction related services, power supply procurement and portfolio management services; hedging of load requirements and supply resources; logistics management and coordination activities; compliance with ISO and state regulatory directives; wholesale counterparty credit administration; and the maintenance of all systems necessary to coordinate with the ISO and/or local utility.

Think Energy also has a contractual relationship with its affiliate, ENGIE Energy Marketing NA, Inc. (“EENA”), an active participant in the wholesale market, to meet all of Think Energy’s wholesale supply, scheduling and settlement needs pursuant to a Master Supply Agreement, as amended (collectively the “MSA”) between Think Energy and EENA. In accordance with the MSA, Think Energy is provided the following support services by its affiliate: all activities with the ISP regarding Think Energy’s provision of energy, capacity, ancillary services, scheduling and procurement of transmission service, congestion management and all other required products and services necessary to serve Think Energy’s load; bidding, sale, scheduling, dispatch, and delivery of energy, capacity and ancillary services necessary to serve Think Energy’s load; and assuring compliance with tariff obligations and reliability obligations, load scheduling; transmission services; and capacity and ancillary supply services.

Think Energy’s parent and Think Energy’s affiliate have decades of experience in the energy industry. Think Energy operates its business in the same manner and processes as its parent company operates. Think Energy believes that its continued proven record of compliant performance of its parent company and affiliate substantially demonstrates that Think Energy maintains the managerial resources and abilities to match the services it provides to its customers, and that Think Energy continues to have the ability and commitment to comply with all CRES standard and procedures, and the rules and regulations of ISP, the local utilities, and the Ohio Revised Code.

Think Energy continues to contract with EC Infosystems Inc. (“ECI”) for its outsourced billing services such as statement generation and mailing, and payment processing, together with support of EDI, XML and other data translation, transmission, auditing, archiving, business rule validation, exception identification

and resolution, transaction management services, market portal, and data exchange. Think Energy employs an internal staff handling customer care services including call center, inbound and outbound call management, error handling and resolutions, online customer service, contract management, customer enrollments, accounts services, and customer management. In addition, Think Energy also maintains the following in-house: (i) operations and customer care staff to manage the day-to-day management of the ECI account and direct contact, as needed, with customers for customer care and billing matters; (ii) supply group to manage pricing analytics and portfolio management; (iii) a marketing team to manage all marketing functions including strategic pricing, market planning, go-to-market strategies, new customer acquisition, and campaign management and analysis; (iv) an IT (information technology) team to manage the internal systems, databases, technical support, customer-facing applicants, back-office applicants, and system integration; (v) a business control team to manage all financial control matters including, billing, revenue, accounting, and settlements; and (vi) an exclusive sales channel to manage all direct and indirect sales channels and third-party relationships. Think Energy continues to offer e-services and after-hour services for 24/7 availability to customers.

Competitive Retail Electric Service Affidavit

County of Harris :

State of Texas :

Ray Cunningham, 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.

Ray Cunningham
Ray Cunningham (Oct 4, 2021 11:12 CDT)

VP & GC

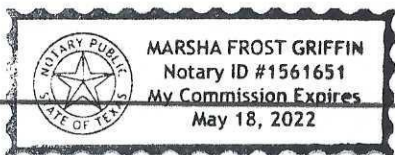
Signature of Affiant & Title

Sworn and subscribed before me this 4th day of October, 2021
Month Year

Marsha Frost Griffin
Signature of official administering oath

Marsha Frost Griffin, Notary Public

Print Name and Title



My commission expires on 05/18/2022

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/6/2021 4:39:13 PM

in

Case No(s). 11-5466-EL-CRS

Summary: In the Matter of the Application of ENGIE Retail LLC