



DIS Case Number: 00-1758-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:** Direct Energy Business, LLC

**Country:** United States

**Phone:** 800-437-7265    **Extension (if applicable):**

**Street:** 1001 Liberty Avenue, Suite 1200

**Website (if any):**  
www.business.directenergy.com

**City:** Pittsburgh    **Province/State:**

**Postal Code:** 15222

### 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
Direct Energy Business	DBA	,	Yes	File
NRG Business	DBA	,	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
Direct Energy Business	DBA	,	Yes	File
NRG Business	DBA	,	Yes	File



## Public Utilities Commission

CPL Business	DBA	,	Yes	File
Direct Energy	DBA	,	Yes	File
NRG	DBA	,	Yes	File
WTU Business	DBA	,	Yes	File

### A-5. Contact person for regulatory matters

John Holtz  
3711 Market Street Suite 1000  
Philadelphia, PA 19104  
US  
john.holtz@nrg.com  
6092807701

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

CONSUMER COMPLAINT-DIRECT ENERGY BUSINESS  
910 Louisiana St  
Houston, TX 77002  
US  
contactdirectenergy@nrg.com  
8889259115

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

<b>Phone:</b> 888-925-9115	<b>Extension (if applicable):</b>	<b>Country:</b> United States
<b>Fax:</b>	<b>Extension (if applicable):</b>	<b>Street:</b> 3711 Market Street, Suite 1000
<b>Email:</b> contactdirectenergy@nrg.com		<b>City:</b> Philadelphia <b>Province/State:</b> PA
		<b>Postal Code:</b> 19104

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

25-1821047

### 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

Duke Energy Ohio  
FirstEnergy - Cleveland Electric Illuminating  
FirstEnergy - Ohio Edison  
FirstEnergy - Toledo Edison  
AES Ohio  
American Electric Power (AEP)

### Class of customer selection

Commercial  
Industrial

### A-11. Start date

Indicate the approximate start date the applicant began/will begin offering services: 10-27-2000

### 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
A. Louis Teuscher	<a href="mailto:louis.teuscher@nrg.com">louis.teuscher@nrg.com</a>	Vice President	910 Louisiana Street Houston, TX 77002 US
Ryan Sullivan	<a href="mailto:ryan.sullivan@nrg.com">ryan.sullivan@nrg.com</a>	Treasurer	804 Carnegie Center Princeton, NJ 08540 US
Paolo Berard	<a href="mailto:paolo.berard@nrg.com">paolo.berard@nrg.com</a>	Secretary	910 Louisiana Street Houston, TX 77002 US
Steven Haugenes	<a href="mailto:steven.haugenes@nrg.com">steven.haugenes@nrg.com</a>	Vice President	804 Carnegie Center Drive Princeton, NJ 08540 US
Joe Holtman	<a href="mailto:joe.holtman@nrg.com">joe.holtman@nrg.com</a>	Vice President	804 Carnegie Center Drive Princeton, NJ 08540 US



## Public Utilities Commission

Thomas Smith	thomas.smith2@directenergy.com	Vice President	910 Louisiana Street Houston, TX 77002 US
Scott Hart	scott.hart@nrg.com	President	910 Louisiana Street Houston, TX 77002 US
S. Meigs Jones	meigs.jones@nrg.com	Vice President & Secretary	1303 San Antonio Street Austin, TX 78701 US

### A-13. Company history

Direct Energy Business, LLC, now a subsidiary of Fortune 500 Company, NRG Energy, Inc. (NRG) since January 2021, has a customer base of approximately six million customers. NRG is a publicly traded U.S. company of sound financial standing and capable management, and is one of the world's leading integrated energy companies that powers homes and business throughout America. Direct Energy Business, LLC, provides commercial and industrial electricity to customers with energy choice and support in managing their energy costs through a portfolio of innovative products and services. Direct Energy Business, LLC currently serves Ohio customers in the major service electric territories that include: AEP Ohio, Dayton Power & Light, Duke Energy, Cleveland Electric & Illuminating, Ohio Edison and Toledo Edison. Direct Energy Business, LLC plans to continue customer acquisitions and retention efforts as part of Direct Energy's business model.

### 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



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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.

Application Experience and Plan Description: Direct Energy Business, LLC (DEB) is part of the NRG Energy, Inc. (NRG) family, one of the world's leading integrated energy companies with a customer base of approximately six million customers. NRG is a publicly traded U.S. company of sound financial standing and capable management, and is one of the industry's leading integrated power companies that powers homes and businesses throughout America. Direct Energy operates in 50 states plus the District of Columbia and 8 Canadian Provinces. DEB has been an Ohio power marketer since the fourth quarter of 2000, and serves customers in the Duke Energy, Dayton Power and Light, Cleveland Electric Illuminating, Ohio Edison, Toledo Power and Light, and AEP- Ohio. territories. DEB plans to continue customer acquisitions and retention efforts as part of the Direct Energy business model.

### **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.

#### **PJM disclosure option chosen**

### **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): Direct Energy Business, LLC does not prepare stand-alone audited financial statements, but is included in the financial statements of NRG Energy, Inc., its ultimate parent company. NRG Energy, Inc.'s two most recent audited financial statements are included in its 10-Ks, and can be found here: <https://investors.nrg.com/financial-information/sec-filings>

#### **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



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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.

Links to Financial Statement(s): Direct Energy Business, LLC does not prepare stand-alone audited financial statements, but is included in the financial statements of NRG Energy, Inc., its ultimate parent company. NRG Energy, Inc.'s two most recent audited financial statements are included in its 10-Ks, and can be found here: <https://investors.nrg.com/financial-information/sec-filings>

### **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'.

File(s) attached

#### 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.

This does not apply.

#### 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?

Merger Information: Effective January 5, 2021, NRG Energy, Inc. acquired 100% of the membership interest in Centrica US Holdings, Inc. (now named Direct Energy U.S. Holdings Inc.).





Direct Energy Business, LLC will retain its licenses and all customers served by the Companies will continue to be served by the Companies.

### **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 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).

File(s) attached

## 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.

Operations Description: Direct Energy Business, LLC, now part of the NRG Energy, Inc. family of companies since January 2021, has operational backing with NRG's affiliates to maximize efficiency in providing high quality service to customers. Direct Energy maintains a 24-hour operation for buying and selling in wholesale markets. Direct Energy Business Marketing, LLC is the wholesale trading affiliate for US Trading and has the contractual relationships with outside parties and partners to provide energy supply for end use customers.

### **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**



**Public Utilities  
Commission**

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

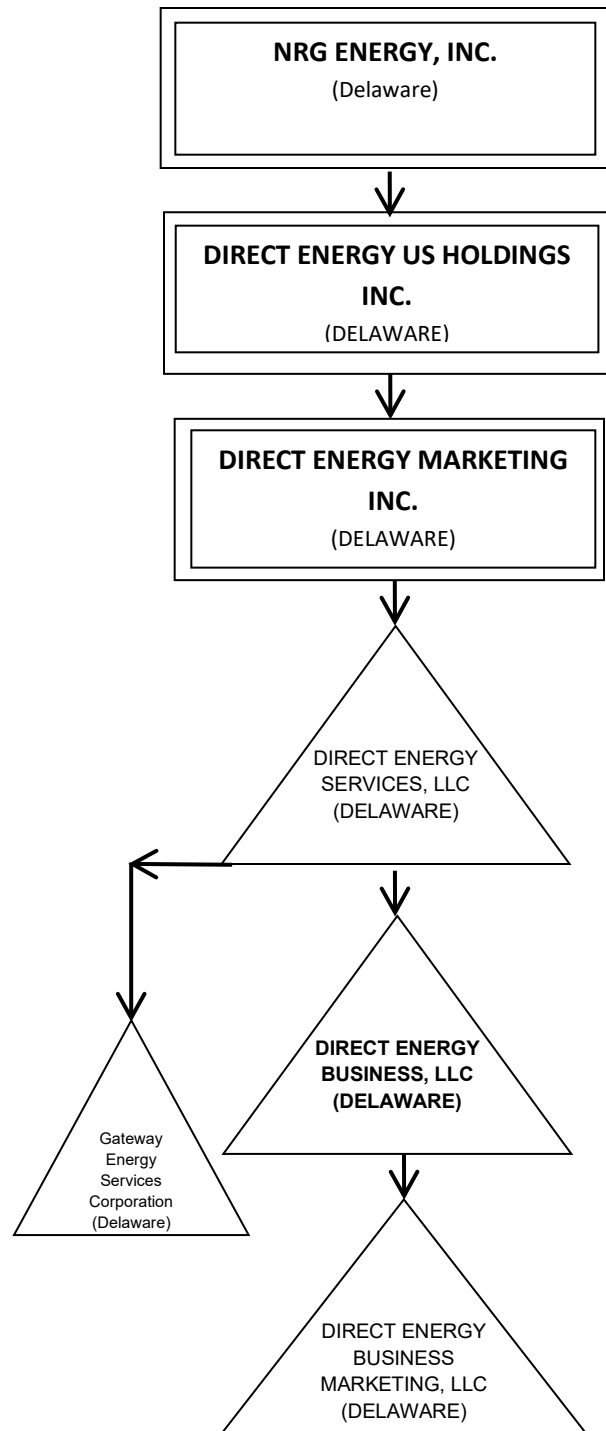
Direct Energy Business, LLC maintains a FERC Market Based Rate Tariff under docket ER11-1850-000.



Public Utilities  
Commission

# Application Attachments

Corporate Structure



**Exhibit D-2 Operations Expertise**

Given the operational nature of the applicant's business, provide evidence of the applicant's experience and technical expertise in performing such operations

**Response:**

Direct Energy Business, LLC has the necessary technical and managerial resources to comply with all scheduling, operating, planning, reliability, customer registration and settlement policies, rules, guidelines and procedures to operate as a retail electric supplier.

Direct Energy Business, LLC's ultimate parent company is NRG Energy, Inc. ("NRG"), a Fortune 500 Company. NRG and its family of companies, which includes Direct Energy Business, employ approximately 7,000 employees. Direct Energy Business, LLC has firsthand knowledge of customer operations and utility business management. Direct Energy Business, LLC will leverage its technical and managerial expertise in combination with its relationships with business partners as described in Exhibit D-1 to successfully develop and implement the infrastructure, systems, and processes to reliably provide service to Ohio consumers. Further, Direct Energy Business, LLC intends to leverage its key internal operating personnel.

**List of Key Operating Personnel:****Vafa Mohtashami, Vice President, Commercial Analytics**

910 Louisiana Street, Houston, TX 77002

Phone: 713-877-3575

[Vafa.Mohtashami@nrg.com](mailto:Vafa.Mohtashami@nrg.com)

**Shawnie McBride, Vice President, Sales – NRG Business Sales Operations**

910 Louisiana Street, Houston, TX 77002

Phone: 732-781-0488

[Shawnie.McBride@nrg.com](mailto:Shawnie.McBride@nrg.com)

**James Connolly, Vice President, Sales – NRG Business Sales West**

Remote

Phone: 740-670-4384

[James.Connolly@nrg.com](mailto:James.Connolly@nrg.com)

**Rodney Kane Kiester, Vice President, Sales – NRG Business Sales East**

1001 Liberty Ave., Pittsburgh, PA 15222

Phone: 412-804-5525

[Kane.Kiester@nrg.com](mailto:Kane.Kiester@nrg.com)

**Stephen Girard, Vice President, Customer Care and Retention Sales**

1001 Liberty Ave., Pittsburgh, PA 15222

Phone: 412-804-5525

[Stephen.Girard@nrg.com](mailto:Stephen.Girard@nrg.com)



# NRG Energy Inc.

## Issuer Credit Rating

RATING TYPE	RATING	RATING DATE	LAST REVIEW DATE	REGULATORY IDENTIFIERS
Local Currency LT	<b>BB+</b> <a href="#">Regulatory Disclosures</a>	24-Jul-2020	31-May-2022	EE UKE
Foreign Currency LT	<b>BB+</b>	24-Jul-2020	31-May-2022	EE UKE

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# NRG Energy, Inc.

CONTACT ANALYST  
TOBY SHEA

SUMMARY

REPORTS

RATINGS & ASSESSMENTS

FINANCIALS

MARKET SIGNALS

CAPITAL STRUCTURE

METHODOLOGIES & FRAMEWORKS

ESGVIEW

TOOLS:

PEER COMPARISON

SCORECARD

REFERENCE:

SECTOR

RATINGS DEFINITIONS

TEAR SHEET

Reports			
FILTER BY			
Rating Action, Announcement +2		Region	Series
Topics / Credit Foundations		Date Range	
DATE	TYPE	TITLE   113 DOCUMENTS	SYNOPSIS
01 Sep 2022	Announcement of Periodic Review	Moody's announces completion of a periodic review for a group of North American Utilities issuers	MOODY'S INVESTORS SERVICE
28 Sep 2021	Announcement of Periodic Review	Moody's announces completion of a periodic review of ratings of NRG Energy, Inc.	MOODY'S INVESTORS SERVICE
30 Mar 2021	Credit Opinion	NRG Energy, Inc.: Update following outlook change to stable from positive	MOODY'S INVESTORS SERVICE
19 Mar 2021	Rating Action	Moody's affirms NRG's Ba1 CFR; changes outlook to stable from positive	MOODY'S INVESTORS SERVICE
16 Dec 2020	Issuer Profile	NRG Energy, Inc.: Key Facts and Statistics - LTM September 2020	MOODY'S INVESTORS SERVICE
16 Oct 2020	Announcement of Periodic Review	Moody's announces completion of a periodic review of ratings of NRG Energy, Inc.	MOODY'S INVESTORS SERVICE
24 Jul 2020	Rating Action	Moody's affirms NRG's Ba1 CFR; outlook positive	MOODY'S INVESTORS SERVICE
30 Dec 2019	Credit Opinion	NRG Energy, Inc.: Update following upgrade to Ba1	MOODY'S INVESTORS SERVICE
13 Dec 2019	Rating Action	Moody's upgrades NRG's CFR to Ba1 from Ba2, outlook positive	MOODY'S INVESTORS SERVICE
06 Nov 2019	Announcement of Periodic Review	Moody's announces completion of a periodic review of ratings of NRG Energy, Inc.	MOODY'S INVESTORS SERVICE
02 May 2019	Issuer Profile	NRG Energy, Inc.: Key Facts and Statistics - FYE December 2018	MOODY'S INVESTORS SERVICE

RATINGSVIEW ALL

LONG TERM RATING

Ba1

LT Corporate Family Ratings - Dom Curr

19 MAR 2021

Not on Watch

SHORT TERM RATING

SGL-1

Speculative Grade Liquidity Rating

06 DEC 2018

Not on Watch

OUTLOOK

Stable

19 MAR 2021

OTHER DEBTS ON WATCH?

No

Source: Moody's Investors Service

## ESG Scores

from Moody's Investors Service

ESG CREDIT IMPACT SCORE (CIS)

CIS-3

Moderately Negative

06 DEC 2021

ESG ISSUER PROFILE SCORES (IPS)

06 DEC 2021

ENVIRONMENTAL

E-4

Highly Negative

SOCIAL

S-3

Moderately Negative

GOVERNANCE

G-3

Moderately Negative

Methodology

ESG Peer Comparison

Source: Moody's Investors Service

Ticker

NRG

LEI

5E2UPK5SW04M13XY7138

Moody's Org Id

806927478

Market Segment

Corporates

Industry

ENERGY: UNREG - ELECTRICITY PRODUCTION

Peer Group



9/26/22, 2:03 PM




NRG Energy, Inc. | Reports | Moody's

DATE	TYPE	TITLE   113 DOCUMENTS	
› 13 Dec 2018	Credit Opinion	<b>NRG Energy, Inc.: Update following ratings upgrade</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 06 Dec 2018	Rating Action	<b>Moody's upgrades NRG to Ba2, outlook positive</b> <a href="#">MOODY'S INVESTORS SERVICE</a>	🔖
› 06 Jul 2018	Credit Opinion	<b>NRG Energy, Inc.: Update to credit analysis</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 18 May 2018	Issuer Profile	<b>NRG Energy, Inc.: Key Facts and Statistics - FYE December 2017</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 30 Nov 2017	Issuer In-Depth	<b>NRG Energy, Inc.: Covenant Quality Pre-Sale Snapshot: \$870m _% Senior Notes due 2028</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 11 Oct 2017	Credit Opinion	<b>NRG Energy, Inc.: A merchant power company undergoing a major transformation</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 06 Oct 2017	Rating Action	<b>Moody's revises NRG Energy's Outlook to Positive</b> <a href="#">MOODY'S INVESTORS SERVICE</a>	🔖
› 09 Aug 2017	Issuer Comment	<b>Dynegy Inc.: Offer to buy back \$1.25 billion of 2019 senior notes is credit positive</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 31 Jul 2017	Issuer Comment	<b>New York Federal Judge Dismisses Challenge of Nuclear Subsidy</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 18 Jul 2017	Credit Opinion	<b>NRG Energy, Inc.: A merchant power company undergoing a major restructuring</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 17 Jul 2017	Issuer Comment	<b>NRG's Restructuring Plan Is Credit Positive</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 13 Jul 2017	Issuer Comment	<b>NRG Energy, Inc.: NRG to reduce debt and simplify financial disclosure, a credit positive.</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 22 May 2017	Issuer Profile	<b>NRG Energy, Inc.: Key Facts and Statistics - FYE December 2016</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	
› 06 Feb 2017	Issuer Comment	<b>GenOn Energy, Inc.: GenOn Mid-Atlantic's letter of credit transaction has limited credit implications</b> ⓘ <a href="#">MOODY'S INVESTORS SERVICE</a>	

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Unreg Utilities and Unreg Power Companies

**Domicile**  
UNITED STATES

MOODY'S INTEGRITY HOTLINE	TERMS & CONDITIONS	CONTACT US	EXPLORE	CONNECT
<div>VIA THE INTERNET: https://Moodys.ethicspoint.com</div> <div>BY TELEPHONE FROM THE UNITED STATES: Dial 1-866-330-MDYS (1-866-330-6397)</div> <div>BY TELEPHONE FROM OUTSIDE THE UNITED STATES: Dial the AT&amp;T Direct Dial Access® code for your location.  Then, at the prompt, dial 866-330-MDYS (866-330-6397).</div>	<div>Terms of Use</div> <div>Privacy Policy</div> <div>Proprietary Rights</div> <div>MIS Code of Professional Conduct</div> <div>Modern Slavery and Human Trafficking Statement</div> <div>Gender Pay Gap Reports</div> <div>Cookie Settings</div>	<div>Careers</div> <div>Help &amp; Support</div> <div>Contact Us</div> <div>Submit a Complaint</div>	<div>Investor Relations</div> <div>Regulatory</div> <div>MoodysAnalytics.com</div> <div>Economy.com</div> <div>Sitemap</div>	<div> @Moody</div> <div> Moody's</div> <div> The Moo</div>
REGIONAL SITES:				Global

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 DIRECT ENERGY BUSINESS, LLC, a Delaware Limited Liability Company, Registration Number 1093143, was registered in the State of Ohio on August 5, 1999, is currently authorized to transact business in this state.*



*Witness my hand and the seal of the  
Secretary of State at Columbus, Ohio  
this 6th day of October, A.D. 2022.*

A handwritten signature in blue ink, appearing to read "Frank LaRose".

**Ohio Secretary of State**

**Validation Number: 202227901876**



October 13, 2022

**RE: NRG Energy, Inc.'s Guarantee of the Obligations of Direct Energy Business, LLC**

To Whom It May Concern:

Direct Energy Business, LLC is a wholly owned subsidiary of NRG Energy, Inc. I certify that NRG Energy, Inc. guarantees the obligations of Direct Energy Business, LLC in this market.

Respectfully submitted,

A handwritten signature in black ink that reads "Thomas A. Smith". The signature is written in a cursive, flowing style.

Thomas Smith, Senior Vice President, Chief Risk Officer  
NRG Energy, Inc.

## Exhibit B1 - Jurisdictions of Operations NRG Retail Affiliates

State	Energy Plus Holdings LLC 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Independence Energy Group LLC d/b/a Cirro Energy 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Energy Plus Natural Gas LLC 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Green Mountain Energy Company 3711 Market Street, Suite 1000 Philadelphia, PA 19104	XOOM Energy [State], LLC 11208 Statesville Road Suite 200 Huntersville, NC 28078
AZ						
CA						Natural Gas: CTA0020
CT	Electric: Docket 09-01-21 April 22, 2009	Electric: Docket 11-11-04 January 4, 2012		Electric: Docket 11-05-20 December 21, 2011	Electric: Docket 13-01-18 May 15, 2013	Electric: 11-06-05 October 12, 2011
DE	Electric: Docket 11-156 Order No. 7698 April 19, 2011			Electric: Docket No. 10-404 Order Nos. 7894 (C&I) & 8035 (Res) Jan 11, 2011; Sept 20, 2011	Electric: Docket No. 11-313 Order No. 8036 September 20, 2011	Electric: Docket No. 12-563 Order No. 8318 March 19, 2013
DC	EA 11-6-5 May 5, 2011			Electric: EA 10-15 October 6, 2010	Electric: EA 11-16 July 12, 2011	Electric: EA 2013-28 January 13, 2014
GA						Natural Gas: GM-45 March 7, 20107
IL	Electric: Docket No. 10-0497 October 6, 2010	Electric: Docket No. 11-0277 May 4, 2011		Electric: Docket #11-0504 March 15, 2011; Aug 2, 2011 Natural Gas: Docket #15-0179 April 22, 2015	Electric: Docket No. 12-0477 & 11-0326 May 18, 2011; Oct 3, 2012 Natural Gas: Docket No. 16-0354 July 20, 2016	Electric: Docket No. 11-0705 December 13, 2011 Natural Gas: Docket No. 11-0724 December 13, 2011
IN						No licensing requirement
KY						No licensing requirement
ME				Electric: Docket # 2015-00224 September 11, 2015		Electric: Docket # 2012-00596 April 24, 2013
MD	Electric: IR-1805 May 26, 2010		Natural Gas: IR-2216 October 6, 2011	Electric: IR-2058 October 27, 2010; May 4, 2011 Natural Gas: IR-3480 May 13, 2015	Electric: IR-2790 & IR-2345 March 7, 2012; Oct 17, 2012 Natural Gas: IR-3752 November 30, 2016	Electric: IR-2445 December 21, 2011 Natural Gas: IR-2446 December 21, 2011
MA	Electric: CS-072 April 23, 2010			Electric: CS-081 May 18, 2011 Natural Gas: RA-154 March 8, 2016	Electric: CS-083 June 8, 2011	Electric: CS-088 September 29, 2011 Natural Gas: GS-RA-07 July 18, 2011
MI						Natural Gas: U-16802 August 25, 2011
MN						
NH				Electric: DM 15-287 December 28, 2015		Electric: DM 13-185 April 15, 2015
NJ	Electric: ESL-0087 Sept 2010	Electric: ESL-0100 July 18, 2012	Natural Gas: GSL-0100 March 9, 2011	Electric: ESL-0093 December 6, 2010 Natural Gas: GSL-0176 October 20, 2017	Electric: ESL-0098 March 30, 2011	Electric: ESL-0115 February 20, 2013 Natural Gas: GSL-0112 February 20, 2013
NY	Electric: Licensed - no license # given ESCO eligibility letter dated 8/8/07	Electric: Licensed - no license # given ESCO eligibility letter dated 5/3/11	Natural Gas: Licensed - no license # given (ESCO Code EPGS) GSCO eligibility letter dated 7/31/08	Licensed - no license # given (ESCO Code RELI) NGSCO eligibility letter dated 2/17/15	Electric & Natural Gas: Licensed - no license # given ESCO eligibility letters dated 4/8/2009 and 8/3/2011	Electric & Natural Gas: Licensed - no license # given ESCO Code: XOOM ESCO/NGSCO eligibility letter dated: 5/21/12
NC						
OH	Electric: 11-341E March 7, 2011	Electric: 12-552E August 16, 2012	Natural Gas: 11-222G August 5, 2011	Electric: 11-401E Oct 14, 2010; May 19, 2011 Natural Gas: 17-591G July 8, 2015	Electric: 18-0483E April 24, 2018	Electric: 13-716E July 22, 2013 Natural Gas: 11-223G January 4, 2012
PA	Electric: A-2009-2139745 January 14, 2010	Electric: A-2011-2262337 October 28, 2011 Natural Gas: A-2013-2396449 April 23, 2014		Electric: A-2010-2192350 Natural Gas: A-2015-2478293	Electric: A-2011-2229050 June 10, 2011; Feb 16, 2012 Natural Gas: A-2017-2583732 April 6, 2017	Electric: A-2012-2283821 October 24, 2012 Natural Gas: A-2012-2283967 December 20, 2012
RI				Electric: D-96-6(P7) August 12, 2015		Electric: D-96-6(A6) January 28, 2013
SC						
TN						
TX	Docket No. 36120 October 9, 2008				Electric: 10009 January 29, 2001	Electric: 10203 July 25, 2011
VA				Electric: E-32 May 28, 2015		Natural Gas: G-37 August 14, 2013
WV						
WI						

## Exhibit B1 - Jurisdictions of Operations NRG Retail Affiliates

State	Stream Energy [State], LLC 2745 Dallas Parkway, Suite	Direct Energy Services, LLC 910 Louisiana	Direct Energy Business, LLC 1001 Liberty Ave., Suite	Direct Energy Business Marketing, LLC (f/k/a Hess) 1001 Liberty Ave., Suite 1200	Gateway Energy Services Corporation 910 Louisiana	Bounce Energy, Inc. 910 Louisiana Street Houston, TX 77002
AZ			Wholesale Supply - APS Pilot			
CA			Electric: 1351 5/1/2000 Natural Gas: 0013	Natural Gas: 0031 12/15/2016		
CT	Gas: 17-01 February 16, 2017	Electric: Docket No. 06-03-06RE02 6/7/2006 Natural Gas: Docket No. 01-04-0000 11/14/2005	Electric: Docket No. 00-05-14RE01 9/27/2000 Natural Gas: 12-	Electric: 13-08-02 1/8/2014 Natural Gas: 13-03		
DE	Electric: Docket No. 17-0340 Order No.	Electric: Docket No. 05-370 Order No.	Electric: Docket No. 09-174 Order No.	Electric: Docket No. 14-204T Order No. 8425 7/31/2013		
DC	Electric: EA 11-11 December 7, 2011	Electric: EA 05-05-05 Order No. 13816 11/14/2005	Electric: EA-04-4-4 5/11/2004	Electric: EA-2013-12 6/20/2013 Natural Gas: GA-2013-03-1	Natural Gas: GA 03-4 9/1/2001	
GA	Natural Gas: GM-38			Gas Transport - No Lic.		
IL	Electric: 17-0033 February 23, 2017 Natural Gas: 17-0045 February 23, 2017	Electric: 05-0722 11/14/2005 Natural Gas: 05-0000 3/11/2005	Electric: 04-0811 2/8/2005	Natural Gas: No License Req.		
IN		No license req.		Gas Transport - No Lic.		
KY				Gas Transport - No Lic.		
ME		Electric: Docket # 2005-479	Electric: Docket # 2011-201	Electric: Docket No. 2013-00404		
MD	Electric: IR-2742 January 26, 2011 Natural Gas: IR-2072 September 12, 2012	Electric: IR-719 4/20/2005 Gas: IR-791 12/14/2005	Electric: IR-437 3/27/2002 Natural Gas: IR-2697 10/3/2012	Electric: IR-3123 8/14/2013 Natural Gas: IR-3108 8/14/2013	Electric: IR-340 6/13/2001 Natural Gas: IR-334 6/13/2001	
MA		Electric: CS-047 8/26/2005 Natural Gas: GS-028	Electric: CS-021 12/2/1999 Natural Gas: GS-052	Natural Gas: GS-051 7/5/2013		
MI		Natural Gas: U-14537 12/20/2005 Electric: U-	Electric: U-13609 11/7/2002	Gas Transport - No Lic.		
MN				Gas Transport - No Lic.		
NH		Electric: DM 15-513 2/5/2016	Electric: DM 15-373 12/31/2015	Electric: DM 13-260 10/9/2013 Natural Gas: DM 13-		
NJ	Electric: ESL-0109 June 22, 2018 Natural Gas: GSL-0120	Electric: ESL-0078 11/10/2005 Natural Gas: GSL-0088	Electric: ESL-0165 8/18/1999 Natural Gas: GSL-0145	Electric: ESL-0142 7/19/2013 Natural Gas: GSL-0128	Electric: ESL-0166 8/18/1999 Natural Gas: GSL-0146	
NY	Electric & Natural Gas: Licensed - no license # given ESCO Code: ESCO eligibility letter dated: 7/13/12	Electric & Natural Gas: licensed - no license # given Eligibility letter dated 11/2/2004	Electric & Natural Gas: licensed - no license # given Eligibility letter dated 5/18/1998	Electric & Natural Gas: licensed - no license # given Eligibility letter dated 5/16/2013	Electric & Natural Gas: licensed - no license # given Eligibility letter dated 3/16/2000	
NC				Gas Transport - No Lic.		
OH	Electric: 17-1187E February 23, 2019 Natural Gas: 08-133G January 21, 2008	Electric: 00-1936-EL 12/2/2004 Natural Gas: 02-024G	Electric: 00-005(10)E 10/27/2000	Natural Gas: 13-303G 5/6/2013		
PA	Electric: A-2010-2181867 September 2, 2010 Natural Gas: A-2012-2308991 September 27, 2012	Electric: A-110164 April 21, 2005 Natural Gas: A-125135 December 2, 2004	Electric: A-110025 7/31/1997 Natural Gas: A-125072 5/22/2014	Electric: A-2013-2368464 8/15/2013 Natural Gas: A-2013-2365792 8/15/2013	Electric: A-2009-2137275 12/21/2009 Natural Gas: A-2009-2138725 10/19/2009	Electric Broker/Marketer: A-2020-3020380 October 8, 2020 Natural Gas Broker/Marketer: A-2020-3023412 May 20, 2021
RI		Electric: D-96-6(U2) 8/3/2005 Natural Gas: 2378(T1)	Electric: D-96-6(Z) 1/9/1998 Natural Gas: 2379(A3)	Electric: D-96-6(J6) 8/14/2013 Natural Gas: 2379(Y2)		
SC				Gas Transport - No Lic.		
TN				Gas Transport - No Lic.		
TX	Electric: 10104 January 21, 2005		Electric: 10011 2/20/2001			
VA		Electric: E-36 10/5/2016	Electric: E-38 5/31/2017	Natural Gas: G-7 6/6/2013	Electric: E-13 9/1/2004 Natural Gas: G-19	
WV				Gas Transport - No Lic.		
WI				Gas Transport - No Lic.		



### **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.

Response:

In the interest of full disclosure, certain NRG licensed retail entities have been the subject of legal and regulatory proceedings, which are summarized below. For information regarding NRG Energy, Inc.'s involvement in material litigation arising out of its participation in U.S. wholesale or retail energy markets, please see the Form 10-K and Form 10-Q filings which can be found at [www.sec.gov](http://www.sec.gov), CIK# 0001013871 or <http://investors.nrg.com/financial-information/sec-filings>.

Direct Energy Business, LLC does not believe there are any liabilities or investigations, existing, pending, or past, that could adversely impact the applicant as described, other than any disclosed in its filings with the U.S. Securities and Exchange Commission. For the sake of completeness, see attached Exhibit B3 for a listing of investigations and related matters from the last two years for Direct Energy Business, LLC and/or its affiliates.



NRG INVESTIGATIONS



ENTITY	REGULATORY AGENCY	DATE OF INCIDENT	DOCKET / PUC CASE NO.	JURISDICTION /	SUMMARY PUBLIC NOTES
Reliant Energy Northeast LLC	Public Utility Commission of Ohio	12/8/2020	Case No. 20-1758-GE-UNC	Ohio	On March 24, 2021, the Public Utilities Commission of Ohio adopted a Joint Stipulation, entered into by Commission Staff and Reliant Energy Northeast LLC d/b/a NRG Business, NRG Home and NRG Retail Solutions ('NRG' or 'Company') to resolve concerns raised by Staff in a Notice of Probable Non-Compliance dated November 27, 2019 ('Notice Letter' or 'Notice'), which largely addressed alleged enrollment violations. NRG was able to demonstrate that its sales performance program and enrollment process are designed to minimize enrollment errors and incentivize compliant sales agent behavior, as reflected in the Company's very low complaint to sales ratio. The Stipulation is not an admission or a finding of liability and represents a reasonable compromise between the parties, including forfeiture of a civil penalty. See Case No. 20-1758-GE-UNC.
Reliant Energy Northeast LLC	Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement ("I&E")	9/29/2020	M-2020-3006647	Pennsylvania	On March 25, 2021, the Pennsylvania Public Utility Commission issued a Final Order approving a Joint Petiton for Approval of Settlement between the PUC's Bureau of Investigation and Enforcement ("I&E") and Reliant Energy Northeast LLC d/b/a Reliant Energy, NRG Business Solutions, Reliant-NRG, NRG Residential Solutions, NRG Retail Solutions, NRG Home and NRG Business ("NRG"). The Settlement resolved issues related to an informal investigation initiated by I&E. I&E's investigation stemmed from informal complaints received by the Commission's Bureau of Consumer Services from residential customers related to the unauthorized enrollment of their accounts by NRG, several of which were self-reported by NRG to PUC Staff. I&E Staff was satisfied with NRG's sales performance program and was unable to identify any improvements to NRG's sales quality assurance program. Although NRG disputes or disagrees with the allegations levied by I&E, it agrees to the settlement terms as a compromise, including payment of a civil penalty. See Docket No. M-2020-3006647.
Energy Plus Holdings LLC	Connecticut - Public Utility Regulatory Authority	9/30/2020	Docket # 09-01-21	Connecticut	On September 30, 2020, the Prosecutorial Division of the Connecticut Public Utilities Regulatory Authority, Office of Education, Outreach, and Enforcement ("Prosecutorial" or "EOE") and Energy Plus Holdings, LLC ("Energy Plus") filed a Settlement Agreement to resolve issues regarding compliance with Conn. Gen. Stat. § 16-245d regarding properly conveying supply summary information to the electric distribution companies for display on customer bills. This Settlement Agreement was approved by the Public Utilities Regulatory Authority on November 4th, 2020 (Docket # 09-01-21). Energy Plus paid a civil penalty of \$282,200 to the State of Connecticut and will refund sixty-nine customers a total of \$5,888.50.
Energy Plus Holdings LLC	Prosecutorial Division of the Connecticut Public Utilities Regulatory Authority, Office of Education, Outreach and Enforcement ("Prosecutorial" or "EOE")	9/30/2020	N/A	Connecticut	On September 30, 2020, the Prosecutorial Division of the Connecticut Public Utilities Regulatory Authority, Office of Education, Outreach, and Enforcement ("Prosecutorial" or "EOE") and Energy Plus Holdings LLC ("Energy Plus") filed a Settlement Agreement to resolve issues regarding compliance with Conn. Gen. Stat. § 16-245d regarding properly conveying supply summary information to the electric distribution companies for display on customer bills. This Settlement Agreement was approved by the Public Utilities Regulatory Authority on November 4th, 2020 (Docket # 09-01-21). Energy Plus paid a civil penalty of \$282,200 to the State of Connecticut and will refund sixty-nine customers a total of \$5,888.50.
Green Mountain Energy Company	Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement ("I&E")	1/8/2021	M-2021-3009235	Pennsylvania	On February 24, 2022, the Pennsylvania Public Utility Commission issued a Final Order approving a Joint Petition for Approval of Settlement between the PUC's Bureau of Investigation and Enforcement ("PA BIE") and Green Mountain Energy Company ("Green Mountain") relating to sales and enrollment practices in Pennsylvania. PA BIE alleged that Green Mountain switched customers to its service without proper authorization in certain instances. Green Mountain agreed to pay a civil penalty of \$156,000 (not inclusive of any customer refunds), along with certain injunctive relief, such as required reporting. Ssee Docket No. M-2021-3009235 (available at: <a href="https://www.puc.pa.gov/pcdocs/1711074.pdf">https://www.puc.pa.gov/pcdocs/1711074.pdf</a> ).
XOOM Energy Ohio, LLC	Public Utility Commission of Ohio	6/1/2021	22-267-GE-COI	Ohio	In June 2021, the Public Utilities Commission of Ohio ("PUCO") issued a notice of probable non-compliance to XOOM Energy Ohio, LLC ("XOOM Energy"), citing concerns with XOOM Energy's compliance with marketing, sales, and enrollment regulations in Ohio. In April 2022, PUCO opened a formal investigation into these same issues. XOOM Energy is cooperating with the investigation, which remains ongoing and has not been subject of any hearing to date.
Direct Energy Services, LLC	Public Utility Commission of Ohio	6/1/2021	22-583-GE-UNC	Ohio	In June 2021, the Public Utilities Commission of Ohio ("PUCO") issued a Notice of Probable Non-compliance to Direct Energy Services ("DES"), citing concerns with DE's compliance with marketing, sales, and enrollment regulations in Ohio. On June 10, 2022 DES and PUCO Staff signed a joint stipulation of settlement in the matter. The Office of Consumer Counsel intervned to be heard on the settlement. The matter is pending.

**Exhibit 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.)

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.

**Response:** See attached letter from Duke Energy.



139 East Fourth  
EX396  
Cincinnati, Ohio 45202

October 17, 2022

Direct Energy Business, LLC has met the Electric Collateral obligations for Duke Energy Corporation as of October 17, 2022.

***Tom Hunt***

Duke Energy Corp  
Certified Supplier Business Center  
[Tom.Hunt@Duke-Energy.com](mailto:Tom.Hunt@Duke-Energy.com)



# **Competitive Retail Electric Service Affidavit**

County of HARRIS :

State of TEXAS :

PAOLO BERARD , 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.

T. Breaux SECRETARY  
Signature of Affiant & Title

Sworn and subscribed before me this 10th day of November, 2022  
Month Year

Trenita Breaux  
Signature of official administering oath

Trenita Breaux, Notary Public

Print Name and Title



My commission expires on July 3, 2025

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**11/14/2022 9:10:44 AM**

**in**

**Case No(s). 00-1758-EL-CRS**

Summary: In the Matter of the Application of Direct Energy Business, LLC