

DIS Case Number: 18-0483-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: Green Mountain Energy Company

Country: United States

Phone: 866-785-4668

Extension (if applicable):

Street: 2929 Arch Street, Suite 1902

Website (if any):

www.greenmountainenergy.com

City: Philadelphia

Province/State: PA

Postal Code: 19104

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
Green Mountain Energy Company	Official Name	2929 Arch Street, Suite 1902 Philadelphia, PA 19104	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
Green Mountain Energy Company	Official Name	2929 Arch Street, Suite 1902 Philadelphia, PA 19104	Yes	File

A-5. Contact person for regulatory matters

Bryce McKenney
3060 Kent Road
Silver Lake, OH 44224
US
bryce.mckenney@nrg.com
3307304941

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

CONSUMER COMPLAINT-Green Mountain Energy Company
2929 Arch Street, Suite 1902
Philadelphia, PA 19104
US
greenmountaincomplaints@nrg.com
6095245138

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

Phone: (855) 500-8703	Extension (if applicable):	Country: United States
Fax:	Extension (if applicable):	Street: 2929 Arch Street, Suite 1902
Email: greenmountaincomplaints@nrg.com		City: Philadelphia Province/State: PA
		Postal Code: 19104

A-8. Applicant's federal employer identification number

30360441

A-9. Applicant's form of ownership

Form of ownership: Corporation

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
 Residential

A-11. Start date

Indicate the approximate start date the applicant began/will begin offering services: 09-03-2018

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
Mark Parsons	mark.parsons@nrg.com	Vice President	910 Louisiana Street Houston, TX 77002 US
A Louis Teuscher	louis.teuscher@nrg.com	Vice President	910 Louisiana Street Houston, TX 77002 US
S. Meigs Jones	meigs.jones@nrg.com	Vice President & Secretary	300 West 6th Street, Suite 900 Austin, TX 78701 US
Deborah Fry	deborah.fry@nrg.com	Assistant Secretary	804 Carnegie Center Princeton, NJ 08540 US
Judith Tompkins	judy.tompkins@nrg.com	Assistant Secretary	804 Carnegie Center Princeton, NJ 08540 US

Jean-Pierre Breaux	jp.breaux@nrg.com	Vice President & Treasurer	804 Carnegie Center Princeton, NJ 08540 US
Elizabeth Killinger	elizabeth.killinger@nrg.com	President and Director	910 Louisiana Street Houston, TX 77002 US

A-13. Company history

Green Mountain Energy Company currently serves both residential and small commercial retail electric services to residential and small commercial customers with licenses in Connecticut, Delaware, District of Columbia, Georgia, Illinois, Maryland, Massachusetts, New Jersey, New York, Ohio and Texas. Green Mountain Energy Company allows customers to choose a plan that fits their needs and offers different pricing options and rewards. Green Mountain Energy Company operates as a subsidiary of NRG Energy, Inc. a Fortune 500 company at the forefront of changing how people think about and use energy.

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.

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): Green Mountain Energy Company 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 10Ks 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 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): Green Mountain Energy Company 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 10Ks 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: On December 6, 2022, Green Mountain Energy Company's ultimate parent company, NRG Energy, Inc. (NRG) and Vivint Smart Home, Inc., announced they both have entered into a definitive agreement under which NRG will acquire Vivint. The transaction closed on March 10, 2023.

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: Green Mountain Energy Company (GMEC) partners with Energy Services Group (ESG) to provide EDI support for the company's operations in the Ohio retail electric market. ESG's services and systems address all of the retail energy business process needs that do not require end use customer interaction (ESG does not provide call center or bill print services).

GMEC leverages the operational resources of its parent NRG Energy, Inc. as well as the company's in-house commercial operations and information technology groups to manage the systems, business processes, interfaces, required data inputs and reporting necessary to forecast, schedule and settle loads in PJM. GMEC has a customer service team to respond to customer inquiries and complaints. Services provided by the call center include handling calls regarding inquiries related to bills, payment arrangements, and other routine matters.

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).

Green Mountain Energy Company's FERC Power Marketer License Number is ER11-4307.

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 GREEN MOUNTAIN ENERGY COMPANY, a Delaware corporation, having qualified to do business within the State of Ohio on December 21, 2000 under License No. 1199732 is currently in GOOD STANDING upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 5th day of February, A.D. 2024.*

A handwritten signature in blue ink that reads "Frank LaRose".

Ohio Secretary of State

Validation Number: 202403603746



DATE:	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
01/08/2001	200100600480	FOREIGN LICENSE/FOR-PROFIT (FLF)	100.00	.00	.00	.00	.00

Receipt

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

C.T. CORPORATION SYSTEM
17 S. HIGH STREET
COLUMBUS, OH 43215

STATE OF OHIO

Ohio Secretary of State, J. Kenneth Blackwell

1199732

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

GREEN MOUNTAIN ENERGY COMPANY

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

Document(s)

FOREIGN LICENSE/FOR-PROFIT

Document No(s):

200100600480

Authorization to transact business in Ohio is hereby given, until surrender, expiration or cancellation of this license.



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of
the Secretary of State at Columbus,
Ohio this 21st day of December,
A.D. 2000.

J. Kenneth Blackwell
Ohio Secretary of State

12/20/00 WED 16:26 FAX 512 691 6151

GREEN MOUNTAIN ENERGY

0002



Prescribed by **J. Kenneth Blackwell**

Please obtain fee amount and mailing instructions from the Forms Inventory List (using the 3 digit form # located at the bottom of this form). To obtain the Forms Inventory List or for assistance, please

call Customer Service:

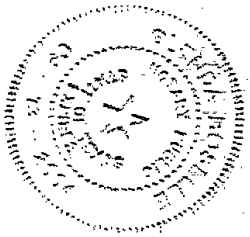
Central Ohio: (614)-466-3910 Toll Free: 1-877-SOS-FILE (1-877-767-3453)

RECEIVED
SECRETARY OF STATE
2000 DEC 21 PM 4:14
CLIENT SERVICE CENTER

FOREIGN CORPORATION APPLICATION FOR LICENSE

1. The name of the corporation is Green Mountain Energy Company
2. The application is made to secure a ☒ permanent ☐ temporary license.
3. The corporation was incorporated on 03/03/99 under the laws of the state of Delaware
(month day year)
4. The corporation's principal office is located at
3815 Capital of Texas Highway South, Suite 100
(street address)
Austin Texas 78704
(city, township, or village) (state) (zip code)
5. The corporation's principal office within Ohio is to be located in ☒ Corp will not have an office in Ohio
_____, Ohio _____
(city, township, or village) (county) (zip code)
6. The corporation hereby appoints the following as its statutory agent upon whom process against the corporation may be served in the state of Ohio. The name and complete address of the statutory agent is: (see item 3 in instructions)
C T Corporation System 1300 East 9th Street
(name) (street and number)
Cleveland, Ohio 44114
(city, village or township) (zip code)
(NOTE: P.O. Box addresses are not acceptable.)
7. The corporation irrevocably consents to service of process on the statutory agent listed above as long the authority of the agent continues, and to service of process upon the SECRETARY OF STATE if
(a) the agent cannot be found, or
(b) the corporation fails to designate another agent when required to do so, or
(c) the corporation's license to do business in Ohio expires or is cancelled.
8. The corporation will exercise the following corporate purpose(s) in Ohio:
(Please provide a brief but specific description; a general purpose clause is not sufficient.)
selling of electricity in retail markets
9. Has the corporation obtained a license to transact business in Ohio at any time in the past? ☐ Yes ☒ No
If yes, prior License No. _____ issued _____
(date)
10. The date on which the corporation began transacting business in Ohio:
☐ Date _____
OR
☒ will begin business upon approval of application.

(date)



151-FLF

OH033 - 6/29/00 C T System, Online

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Version: 7/15/99

FROM CORPORATION TRUST DOVER 302-674-5863 (WED) 12.20'00 11:15/ST. 11:13/NO. 33008/0029 F 4/4

State of Delaware
Office of the Secretary of State

PAGE 1

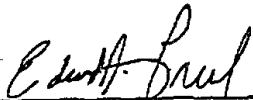
I, EDWARD J. FREEL, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "GREEN MOUNTAIN ENERGY COMPANY" IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTIETH DAY OF DECEMBER, A.D. 2000.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.

3011848 8300

001638725


Edward J. Freel, Secretary of State

AUTHENTICATION: 0867130

DATE: 12-20-00

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.

Response: Green Mountain Energy Company 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 for Green Mountain Energy Company and/or its affiliates.



ENTITY	REGULATORY AGENCY	DATE OF INCIDENT	DOCKET / PUC CASE NO.	DATE OF RESOLUTION	STATUS	SUMMARY
Reliant Energy Northeast LLC	PUCO - Public Utility Commission of Ohio	12/8/2020	Case No. 20-1758-GE-UNC	3/24/2021	RESOLVED	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.
Direct Energy Services, LLC	Maryland - Public Service Commission	5/15/2019	Case No. 9614	Ongoing	OPEN	In May 2019, the Maryland PSC Staff filed a complaint against DES alleging DES committed fraud, engaged in deceptive business practices and violated the PSC's consumer protection regulations between January 2016 and June 2019. The Office of Peoples Counsel (OPC) then also filed a complaint alleging customer slamming and violations of the Maryland Telephone Solicitations Act (MTSA). The PSC issued an order in April 2021 approving a partial settlement of issues, and levied a \$125,000 civil penalty and refunds to 21 customers. Issues related to the MTSA were reserved for litigation. The case is currently on appeal at the Anne Arundel County Circuit Court. Oral Arguments were held April 23, 2023. Awaiting a Decision.
XOOM Energy Texas, LLC	Public Utility Commission of Texas	10/16/2019	PUCT Docket No. 50102	10/16/2019	RESOLVED	On October 16, 2019 Staff of the Public Utility Commission of Texas (the "PUCT") and XOOM Energy Texas, LLC ("XOOM") entered into a Settlement Agreement to resolve and conclude PUCT Staff's investigation of XOOM relating selection of a retail electric provider in accordance with PUCT rules. The Settlement Agreement is filed in PUCT Docket No. 50102 (available at: http://interchange.puc.texas.gov/Documents/50102_1_1037759.PDF). The settlement was approved by the PUCT.

Reliant Energy Northeast LLC	Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement ("I&E")	9/29/2020	M-2020-3006647	3/25/2021	RESOLVED	On March 25, 2021, 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 ("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	11/4/2020	RESOLVED	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.
XOOM Energy Ohio, LLC	PUCO - Public Utility Commission of Ohio	6/1/2021	22-267-GE-COI	Ongoing	OPEN	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. On August 2, 2023, XOOM Energy entered into a stipulation with PUCO Staff to settle the matter. Under the terms of the settlement, XOOM Energy did not admit wrongdoing but will: (i) pay a forfeiture of \$120,000; (ii) pay \$100,000 to the Dollar Energy Fund to be used as bill payment assistance; (iii) provide refunds to affected customers; and (iv) implement corrective actions to monitor enrollments. This matter is pending.
Direct Energy Services, LLC	PUCO - Public Utility Commission of Ohio	6/1/2021	22-583-GE-UNC	Ongoing	OPEN	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 intervened to be heard on the settlement. This matter is pending.

XOOM Energy ONT, ULC	Ontario Energy Board (OEB)	2/1/2023	EB-2022-0143	1/26/2023	RESOLVED	The Ontario Energy Board ("OEB") conducted an inspection of XOOM Energy ONT, LLC ("XOOM") following an inquiry by the company. The OEB alleged that XOOM's contracts and associated price comparison forms for low volume consumers in use during the period of 2017 through 2020, did not adequately disclose the manner in which the variable price for electricity or gas would be calculated. The OEB has accepted an Assurance of Voluntary Compliance ("AVC") from XOOM which was executed on January 26, 2023. Through the AVC, in a manner satisfactory to the OEB, XOOM agreed to pay a \$15,000.00 administrative monetary penalty as well as adjusting its contracts and price comparison forms for low volume consumers that will include a clearer description of how prices are calculated and may change throughout the term of a contract.
XOOM Energy Connecticut, LLC	Connecticut - Public Utility Regulatory Authority	3/15/2023	11-06-05	6/29/2023	RESOLVED	On June 29, 2023 the Connecticut Public Utilities Regulatory Authority approved a Settlement Agreement between the Office of Education, Outreach, and Enforcement ("EOE") and XOOM Energy Connecticut, LLC ("XOOM Energy") that resolved a Notice of Violation issued by the Authority on March 15, 2023. The Notice of Violation alleged that XOOM Energy failed to comply with a 2021 law prohibiting the charging of cancellation fees to residential customers. XOOM Energy included language about cancellation fees in certain customer-facing materials, although the company did not charge nor collect such fees from customers. Under the terms of the Settlement, XOOM Energy will pay a total of \$1.5 million to the electric distribution companies Connecticut Light & Power and United Illuminating for application to customer bills to reduce hardship customer arrearages and will also provide bill credits in the amount of \$75 to affected residential customer accounts. Additionally, XOOM Energy pledged to remove any remaining references to cancellation fees from customer-facing materials.
Direct Energy Services; Energy Plus Holdings LLC; Energy Plus Natural Gas LLC; Gateway Energy Services Corporation; Green Mountain Energy Company; Reliant Energy Northeast LLC; Stream Energy New York, LLC; XOOM Energy New York, LLC	NY PSC	1/8/2024	N/A	Ongoing	OPEN	On January 8, 2024, the NYPSC notified eight of NRG's retail energy suppliers (serving both electricity and natural gas) of alleged non-compliance with New York regulatory requirements. Among other items, the notices allege that the NRG suppliers did not, following April 16, 2021 (which was the effective date of the NYPSC's December 2019 Order Adopting Changes to the Retail Access Energy Market and Establishing Further Process), transition its existing residential customers to one of three newly-created products authorized by the NYPSC. NRG is responding to the notices.

NRG Energy Inc.

Issuer Credit Rating

RATING TYPE	RATING	RATING DATE	LAST REVIEW DATE ?	REGULATORY IDENTIFIERS	CREDITWATCH/ OUTLOOK	CREDITWATCH/ OUTLOOK DATE
Local Currency LT	BB Regulatory Disclosures	01-Mar-2023	24-Apr-2023	EE UKE	Stable	01-Mar-2023
Foreign Currency LT	BB Regulatory Disclosures	01-Mar-2023	24-Apr-2023	EE UKE	Stable	01-Mar-2023

NRG Energy, Inc.

CONTACT ANALYST
TOBY SHEA

- SUMMARY
- REPORTS
- RATINGS & ASSESSMENTS
- FINANCIALS
- MARKET SIGNALS
- CAPITAL STRUCTURE
- METHODOLOGY & 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

SYNOPSIS

DATE	TYPE	TITLE 71 DOCUMENTS
› 31 Jul 2023	Announcement of Periodic Review	Moody's announces completion of a periodic review for a group of North American Utility issuers MOODY'S INVESTORS SERVICE
› 01 Mar 2023	Rating Action	Moody's assigns Ba3 to NRG's preferred stock MOODY'S INVESTORS SERVICE
› 13 Dec 2022	Credit Opinion	NRG Energy, Inc.: Update following the Vivint acquisition announcement MOODY'S INVESTORS SERVICE
› 06 Dec 2022	Rating Action	Moody's affirms NRG's Ba1 CFR and maintains stable outlook following Vivint acquisition announcement MOODY'S INVESTORS SERVICE
› 01 Sep 2022	Announcement of Periodic Review	Moody's announces completion of a periodic review for a group of North American Utility 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 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 B outlook positive MOODY'S INVESTORS SERVICE

RATINGS VIEW ALL

LONG TERM RATING

Ba1

LT Corporate Family Ratings - Dom Curr
06 DEC 2022
Not on Watch

SHORT TERM RATING

SGL-2

Speculative Grade Liquidity Rating
06 DEC 2022
Not on Watch

OUTLOOK

Stable

06 DEC 2022

OTHER DEBTS ON WATCH?
No

Source: [Moody's Investors Service](#)

ESG Scores

from Moody's Investors Service
ESG CREDIT IMPACT SCORE (CIS)

CIS-3

06 DEC 2021

ESG ISSUER PROFILE SCORES (IPS)
06 DEC 2021

ENVIRONMENTAL	SOCIAL	GOVERNANCE
E-4	S-3	G-3

Methodology | [ESG Peer Comparison](#)

Source: [Moody's Investors Service](#)

Ticker
NRG

LEI
5E2UPK55W04M13XY7138

Moody's Org Id
806927478

Market Segment
Corporates

Industry

Privacy - Terms

DATE	TYPE	TITLE 71 DOCUMENTS
› 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
› 13 Dec 2018	Credit Opinion	NRG Energy, Inc.: Update following ratings upgrade MOODY'S INVESTORS SERVICE
› 06 Dec 2018	Rating Action	Moody's upgrades NRG to Ba2, outlook positive MOODY'S INVESTORS SERVICE
› 06 Jul 2018	Credit Opinion	NRG Energy, Inc.: Update to credit analysis MOODY'S INVESTORS SERVICE
› 11 Oct 2017	Credit Opinion	NRG Energy, Inc.: A merchant power company undergoing a major transformation MOODY'S INVESTORS SERVICE
› 06 Oct 2017	Rating Action	Moody's revises NRG Energy's Outlook to Positive MOODY'S INVESTORS SERVICE
› 18 Jul 2017	Credit Opinion	NRG Energy, Inc.: A merchant power company undergoing a major restructuring MOODY'S INVESTORS SERVICE
› 28 Nov 2016	Credit Opinion	NRG Energy, Inc.: A U.S. unregulated power company MOODY'S INVESTORS SERVICE
› 19 Oct 2016	Announcement	Moody's: Carbon reduction policies bring new opportunities for global unregulated utilities MOODY'S INVESTORS SERVICE
› 29 Apr 2016	Credit Opinion	NRG Energy, Inc.: A U.S. unregulated power company MOODY'S INVESTORS SERVICE
› 21 Mar 2016	Rating Action	Moody's Affirms NRG Energy's Ba3 CFR; Outlook Stable MOODY'S INVESTORS SERVICE
› 17 Mar 2016	Announcement	Moody's: Sponsor strategy drives yieldco credit quality during market uncertainty while M&A

ENERGY: UNREG - ELECTRICITY PRODUCTION

Peer Group
Unreg Utilities and Unreg Power Companies

Domicile
UNITED STATES

1 2 3 Next › ››

MOODY'S INTEGRITY HOTLINE

VIA THE INTERNET:
<https://Moodys.ethicspoint.com>

BY TELEPHONE FROM THE UNITED STATES:
Dial 1-866-330-MDYS (1-866-330-6397)

BY TELEPHONE FROM OUTSIDE THE UNITED STATES:
Dial the AT&T Direct Dial Access® code for your location.
Then, at the prompt, dial 866-330-MDYS (866-330-6397).

TERMS & CONDITIONS

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REGIONAL SITES: Global



139 East Fourth
EX396
Cincinnati, Ohio 45202

February 7, 2024

Green Mountain Energy Company has met the Electric Collateral obligations for Duke Energy Corporation as of February 7, 2024.

Heather Klein

Duke Energy Corp
Certified Supplier Business Center
CSBCreps@duke-energy.com



**Green Mountain Energy Company
Corporate Structure**





February 9, 2024

RE: NRG Energy, Inc.'s Guarantee of the Obligations of Green Mountain Energy Company

To Whom It May Concern:

Green Mountain Energy Company is a wholly owned subsidiary of NRG Energy, Inc. I certify that NRG Energy, Inc. guarantees the obligations of Green Mountain Energy Company in this market.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shawnie McBride", with a long horizontal line extending to the right.

Shawnie McBride
Chief Risk Officer
NRG Energy, Inc.

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.

Response:

Green Mountain Energy Company ("GMEC") utilizes a mix of marketing channels to reach potential customers and utilizes utility consolidated billing to provide billing statements to customers. GMEC has a customer service team reachable via a toll-free phone number to respond to customer inquiries and/or complaints. Services provided by the call center include handling calls regarding inquiries related to bills, awards, discretionary service orders, and other routine matters.

In addition, the team at GMEC has worked closely with the Public Service Commissions in each state to ensure both adherence to, and contribution toward, policies and regulations that will continue to promote the competitive landscape in the states of Illinois, Massachusetts, Maryland, New Jersey, New York and Pennsylvania.

GMEC employs a sales and marketing compliance review process that ensures that all customer-facing material is reviewed for regulatory and legal compliance prior to being deployed in the field. The Company utilizes employees and channel partners to market its services. Green Mountain Energy Company has been serving residential and commercial customers since 1997.

Our Creative Review Process (CRP) ensures all customer and external facing collateral material is submitted for review, including: all marketing message maps/documents; solicitation materials (direct mail, email, phone/door-to-door/face to face events/campaigns, etc.); marketing collateral; advertising (web, TV, radio, bill boards, etc.); agent training materials; agent scripts (sales, call center reps, TPV, etc.); welcome kits/letters; renewal letters; customer notices/communications; website content; press releases; etc. All GMEC employees involved in the production of customer facing materials have access to the CRP system and submit their materials for review and approval by our compliance review team.

As customer service and satisfaction are core principles of GMEC's business model, GMEC takes the necessary actions to ensure that it is in compliance with all regulatory requirements. GMEC includes the following core principles into its business operations:

- **Call Center Reps:** GMEC customer service agent training content covers customer choice, product details, and market/sales regulations within 80 hours of instructor led training, and 80 hours of on the job training. Upon completion of training, all agents are required to sign a Quality Assurance Agreement indicating that they understand specific market/sales regulations and that they will follow applicable guidelines. All call center agents are audited each month to ensure quality standards and compliance with regulations, and there are penalties for non-compliance.

B-2. Experience and Plans

- **Full-time Quality Assurance Staff:** We employ full-time staff located at our corporate office and in the field offices; their full time jobs are to train, monitor, evaluate, audit all face-to-face sales activities and proactively address concerns/issues in an effort to avoid/minimize complaints. They also ensure agents have the materials/ resources they need. Market managers are assigned to each state to manage all face-to-face product offers and campaigns and interact with agents/vendors on an ongoing basis.
- **Robust training and certification process:** All agent training is conducted either by our own QA analysts or a vendor trainer that has been certified by our QA analyst. GMEC provides all training materials. Training is ongoing depending on the season – in the summer – typically weekly. Agents trained on the code of ethics/consumer protection rules, uniform requirements, sales techniques, our products, and the proper procedures for completing the sales transaction and TPV.
- **Thorough auditing process:** includes performance measures and scoring metrics for individual agents. The goal is to identify trends/discrepancies that raise flags and help us to identify and address problems with our agents. Process includes face-to-face audits as well as audits of enrollment forms, TPV calls, and outbound surveying of customers.
- **Detailed performance measures for agents:** allows us to objectively rate and track agent performance; Agents rated on 10 areas of performance measured during face-to-face audits – range from visibility of ID badge, uniform/appearance, behavior, proper materials used, current disclosure statement, proper explanation of competition/restructuring, choice, utility and retailer roles; accuracy of product description, sales technique, accuracy of explanation of key terms, provision of rescission notice and copies of materials, proper completion of enrollment forms/tablet process, proper transfer to TPV.
- **Robust complaint handling/discipline process:** process established to address concerns/issues with agents; GMEC monitors and tracks all complaints and categorizes them according to severity, and to specifically identify major/mid-level complaints (disputed enrollments, misrepresentation, behavior, PUC complaints, etc.); established guidelines dictate course of disciplinary action.
- GMEC has made the Anti-Discrimination Rules easily accessible by the company's employees on a regular basis.
- GMEC will make customers aware of the process to file a complaint with GMEC and how to contact the Public Utilities Commission of Ohio.

Competitive Retail Electric Service Affidavit

County of Harris :

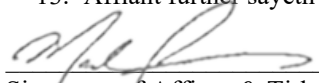
State of Texas :

Mark Parsons , Affiant, being duly sworn/affirmed, hereby states that:

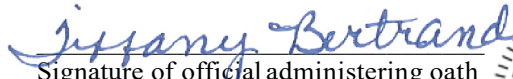
1. The information provided within the certification or certification renewal application and supporting information is complete, true, and accurate to the best knowledge of affiant, and that it will amend its application while it is pending if any substantial changes occur regarding the information 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.

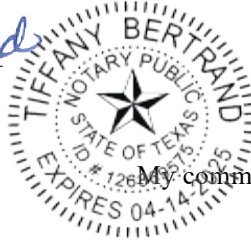
12. The facts set forth above are true and accurate to the best of his/her knowledge, information, and belief and that he/she expects said applicant to be able to prove the same at any hearing hereof.

13. Affiant further sayeth naught.

, Vice President
Signature of Affiant & Title

Sworn and subscribed before me this 4th day of March, 2024
Month Year


Signature of official administering oath



Tiffany Bertrand, Notary
Print Name and Title

My commission expires on 04/14/2025

NRG Retail Affiliates

State	Energy Plus Holdings LLC 2929 Arch Street, Suite 1902, Philadelphia, PA 19104	Independence Energy Group LLC d/b/a Cirro Energy 2929 Arch Street, Suite 1902, Philadelphia, PA 19104	Energy Plus Natural Gas LLC 2929 Arch Street, Suite 1902, Philadelphia, PA 19104	Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business 2929 Arch Street, Suite 1902, Philadelphia, PA 19104	Green Mountain Energy Company 2929 Arch Street, Suite 1902, Philadelphia, PA 19104	XOOM Energy (State), LLC 804 Carnegie Center Princeton, NJ 08540
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-48 October 3, 2023	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: CS-081 May 18, 2011 Natural Gas: GS-063 March 8, 2016	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 Electric: CS-088 September 29, 2011 Natural Gas: GS-RA-07 July 18, 2011
MA	Electric: CS-072 April 23, 2010				Electric: CS-083 June 8, 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-0233	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) ESCO eligibility letter dated 8/26/11 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						

NRG Retail Affiliates

State	Stream Energy [State], LLC 2745 Dallas Parkway, Suite 200 Plano, TX 75093	Direct Energy Services, LLC 910 Louisiana Street Houston, TX 77002	Direct Energy Business, LLC 1001 Liberty Ave., Suite 1200 Pittsburgh, PA 15222	NRG Business Marketing LLC 804 Carnegie Center Princeton, NJ 08540	Gateway Energy Services Corporation 910 Louisiana Street Houston, TX 77002	Bounce Energy, Inc. 910 Louisiana Street Houston, TX 77002
AZ			Wholesale Supply - APS Pilot			
CA			Electric: 1351 5/1/2000 Natural Gas: 0013 1/1/2015	Natural Gas: 0031 12/15/2016		
CT	Gas: 17-01 February 16, 2017	Electric: Docket No. 06-03-06 6/7/2006 Natural Gas: Docket No. 01-04 9/23/2004	Electric: Docket No. 00-05-14 9/27/2000 Natural Gas: 12-03 7/9/2012	Electric: 13-08-02 1/8/2014 Natural Gas: 13-03 5/7/2013		
DE	Electric: Docket No. 17-0340 Order No. 9137 October 31, 2017	Electric: Docket No. 05-370 Order No. 6790 12/6/2005	Electric: Docket No. 09-174 Order No. 5267 8/18/1999	Electric: Docket No. 14-204T Order No. 8425 7/31/2013		
DC	Electric: EA 11-11 December 7, 2011 Natural Gas: GA 2013-07 August 29, 2013	Electric: EA-05-3-5 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 4/30/2013	Natural Gas: GA 03-4 9/1/2001	
GA	Natural Gas: GM-38 April 1, 2008			Gas Transport - No Lic.		
IL	Electric: 17-0033 February 23, 2017 Natural Gas: 17-0045 February 23, 2017	Electric: 05-0722 12/21/2005 Natural Gas: 05-0086 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 12/13/2005	Electric: Docket # 2011-201 7/5/2011	Electric: Docket No. 2013-00404 8/20/2013		
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: CS-047 8/26/2005 Natural Gas: GS-028 8/27/2004	Electric: IR-437 3/27/2002 Natural Gas: IR-2697 10/3/2012 Electric: CS-021 12/2/1999 Natural Gas: GS-052 3/14/2014	Electric: IR-3123 8/14/2013 Natural Gas: IR-3108 8/14/2013 Natural Gas: GS-051 7/5/2013	Electric: IR-340 6/13/2001 Natural Gas: IR-334 6/13/2001	
MA		Natural Gas: U-14537 12/20/2005 Electric: U-14724 12/20/2005	Electric: U-13609 11/7/2002	Gas Transport - No Lic.		
MI				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 13-121 5/29/2013		
NJ	Electric: ESL-0109 June 22, 2018 Natural Gas: GSL-0120 June 22, 2018	Electric: ESL-0078 11/10/2005 Natural Gas: GSL-0088 4/20/2005	Electric: ESL-0165 8/18/1999 Natural Gas: GSL-0145 8/15/2012	Electric: ESL-0265 12/6/2023 Natural Gas: GSL-0229 12/6/2023	Electric: ESL-0166 8/18/1999 Natural Gas: GSL-0146 8/18/1999	
NY	Electric & Natural Gas: Licensed - no license # given ESCO Code: STRM 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 2, 2008	Electric: 00-1936-EL 12/2/2004 Natural Gas: 02-024G 7/19/2002	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) 9/28/2004	Electric: D-96-6(I2) 1/9/1998 Natural Gas: 2379(A3) 6/28/2013	Electric: D-96-6(J6) 8/14/2013 Natural Gas: 2379(Y2) 5/31/2013		
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-35B 8/28/2023	Electric: E-13 9/1/2004 Natural Gas: G-19 1/24/2004	
WV				Gas Transport - No Lic.		
WI				Gas Transport - No Lic.		

NRG Retail Affiliates

	Canada			U.S. - Texas						
State	XOOM Energy [State], LLC 804 Carnegie Center Princeton, NJ 08540	Direct Energy Marketing Limited 10303 Jasper Avenue, Suite 1850, Edmonton AB T5J 3M6, Canada	Direct Energy (B.C.) Limited 10303 Jasper Avenue, Suite 1850, Edmonton AB T5J 3M6, Canada	Reliant Energy Retail Services LLC 910 Louisiana St Houston, TX 77002	US Retailers LLC 910 Louisiana St Houston, TX 77002	Everything Energy LLC 910 Louisiana St Houston, TX 77002	Direct Energy, LP 910 Louisiana Street Houston, TX 77002	CPL Retail Energy, LP 910 Louisiana Street Houston, TX 77002	WTU Retail Energy, LP 910 Louisiana Street Houston, TX 77002	First Choice Power, LLC 910 Louisiana Street Houston, TX 77002
TX	Electric: 10203 July 25, 2011			Electric:10007 January 5, 2001	Electric:10177 October 27, 2008	Electric:10178 October 27, 2008	Electric: 10040	Electric: 10023	Electric: 10022	Electric: 10008
VA	Natural Gas: G-37 August 14, 2013									
WV										
WI										
Alberta	Electric: File No. 342997 December 31, 2024 Natural Gas: File No. 342996 December 31, 2024	Electric: 311173 Issued 10/1/23; Expires 9/30/24 Natural Gas: 311172 Issued 10/1/23; Expires 9/30/24								
British Columbia			Natural Gas: A-6-23 Issued 10/24/23; Expires 10/31/24							
Manitoba		Natural Gas: 681 Issued 8/21/23; Expires 10/31/24								
New Brunswick		Natural Gas Marketer Issued 6/15/23; Expires 6/15/26								
Nova Scotia		Natural Gas: M08018 License issued 6/9/17 - does not expire								
Ontario	Electric: ER-2023-0362 February 28, 2024 Natural Gas: GM-2023-0361 February 28, 2024	Electric: Lic # ER-2020-0168 Issued: 8/27/20; Expires 8/26/25								
Saskatchewan		Natural Gas: No license required								
Quebec		Natural Gas: No license required								

D-2. Operations expertise and key technical personnel

Provide evidence of the applicant's experience and technical expertise in performing the operations described in this application. Include the names, titles, e-mail addresses, telephone numbers and background of key personnel involved in the operational aspects of the applicant's business. If vendors or third parties are or will be utilized for any activities listed in this application, provide the name, contact information for each, and list which activities they will perform. Also, indicate which activities will be performed directly by the company. Please note that this information is required to be updated within 30 days of any changes.

Response:

Green Mountain Energy Company ("GMEC") 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 and natural gas supplier. As an active retail energy provider in the states of Illinois, Massachusetts, Maryland, New Jersey, New York, Pennsylvania and Texas, GMEC has firsthand knowledge of the customer operations and utility business management and will leverage its technical and managerial expertise, in combination with its relationships with the attached business partners to successfully develop and implement the infrastructure, systems, and processes to reliably provide service to Ohio consumers. Please see the attached list of GMEC's Key Operating Personnel.

GREEN MOUNTAIN ENERGY COMPANY - KEY OPERATING PERSONNEL**Mark Parsons, Vice President and General Manager**

910 Louisiana Street, Houston, TX 77002

Phone: 713-537-2825

Mark.Parsons@nrg.com

Mr. Parsons is the General Manager of Green Mountain Energy. Mr. Parsons is passionate about leveraging the power of consumer choice to change the way power is made. Ensuring customers have access to compelling green power solutions at home, at work and on the go is the driving force of Mr. Parson's role. He is responsible for the performance and direction of Green Mountain and oversees a wide range of functions such as brand and go-to-market strategy, customer experience, marketing execution, pricing and margin management, financial reporting, offer and product innovation, market share, customer count, and campaign design. Over Mr. Parsons 15 years within the deregulated energy industry across many retail brands, he has been instrumentally involved in transitioning a regulated electric utility into the largest retail energy provider in Texas. He has also helped launch new retailers into positions of power in the industry. He's held many roles in IT, project management, operations and general management throughout the years. Additionally, Mr. Parsons has served in roles focused on strategy development, mergers/acquisitions, and process and systems integration. He earned his bachelor's degree in economics from the University of Texas and his master's degree in business administration from Baylor University.

Jordon McConnell, Vice President, Sales Strategy

3711 Market Street, Suite 1000, Philadelphia, PA 19104

Phone: 267.295.0625

Jordon.McConnell@nrg.com

Jordon McConnell leads Sales, Sales Operations and Quality for NRG's retail business in the Northeast. Over the course of his career, Mr. McConnell has gained experience in a broad range of business functions including marketing, sales, product development, operations and financial analysis. Jordon has held leadership positions in a number of industries including energy, finance, professional services and business information with emphasis on consumer and small business segments. Prior to joining NRG Jordon led marketing strategy and helped launch the digital retail channel for D&B's small business segment. Previously Jordon held business development roles in the eBusiness segments of Prudential Securities and FirstUSA Bank. Jordon holds an MBA from the University of Delaware and a BA from Bucknell University.

Jeff Wilkinson, Senior Director – Sales & Channel/Campaign Management

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Jeff Wilkinson leads Sales and Channel/Campaign Management for NRG's retail business in Texas and the Northeast. In this role, Mr. Wilkinson is responsible for supporting and enabling the marketing and sales organizations at NRG to deliver on their sales and customer retention objectives while providing outstanding experiences for residential and small commercial customers. He has nearly 20 years of experience in the retail energy industry, having joined Reliant, an NRG company, shortly after restructuring in Texas. Prior to his role at NRG, Jeff served as a Product Marketing Manager for high-availability servers at Compaq Computer Corporation and as a Naval Architect with J. Ray McDermott Engineering. Jeff holds an MBA from Rice University and a BS from Texas A&M University.

Brian Grant, Billing Operations, East Retail

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Mr. Grant is responsible for defining the processes and procedures for the day to day IT functions, operations and quality assurance protocols for NRG Retail in the Northeast. His daily responsibilities include ensuring that all enrollments process accurately and efficiently through all of NRG's internal systems and integration points with its external vendors. Mr. Grant brings a strong background in operational processes and quality assurance. During his tenure, Mr. Grant successfully implemented a quality assurance project life cycle process that included the implementation of new technology hardware as well as processes and gates to increase the accuracy and efficiency of the energy enrollment process and customer service platforms. His continual focus on quality assurance and streamlined operational processes will ensure that NRG is poised to offer a best in class service experience to retail customers.

**Barry Gessner, Director Mass Retail and Demand Response;
Market Operations**

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Barry Gessner joined NRG Energy through its acquisition of Energy Plus in 2011. He is responsible for scheduling electricity purchases in ISO-NE, MISO, NYISO, PJM, and Canada; hedging electricity supply purchases to mitigate market cost volatility; meeting renewable portfolio standards and voluntary green power program requirements; and cost forecasting and market settlements. Prior to his roles at NRG, Mr. Gessner was responsible for custom pricing of large commercial and industrial customers at Liberty Power. Mr. Gessner holds an MBA from Villanova University, a BS Economics from Penn State, and is a GARP certified Energy Risk Professional.

Steven Haugen, Vice President – Natural Gas

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Steve currently leads NRG's Natural Gas Operations and Trading team responsible for overseeing all-natural gas operational, commercial supply and trading activities. Steve has more than 30 years of experience in trading, origination, risk management and finance, and has a strong record of success at NRG, Direct Energy, Hess Energy Marketing and the Military. He received a Bachelor of Science degree in Management from the United States Military Academy, West Point in 1989 and an MBA From the Stern School of Business, NYU in 1995. Steve has been a Chartered Financial Analyst (CFA) Chart holder since 2004 and attended the Harvard Program for Emerging Leaders in 2006.

Rebecca Emrick, Director of Marketing, Green Mountain Energy

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Rebecca leads a team responsible for brand strategy, marketing execution, customer communications, digital engagement, creative development and sales-related collateral. She has served in multiple capacities during her marketing career, including developing mass media campaigns, which consisted of television, radio and billboard promotions, and creating customer communications and touch points for acquisition and retention. Rebecca has led teams to re-engineer creative formats, which resulted in increased response rates, a streamlined development process and an increase in team productivity. It's with her support and guidance that her teams have produced multiple award-winning communications recognized by marketing experts. Rebecca's leadership in marketing communications spans many segments over many years. She has served a variety of audiences in the B2B and B2C worlds throughout the deregulated energy industry, insurance business and financial services industry. She also sits on the board of the Green Mountain Sun Club, a nonprofit program that supports solar and sustainability projects for nonprofit organizations. Rebecca earned her bachelor's degree in public relations from Texas Tech University.

Bill Clayton, Vice-President – Customer Care & Retention Sales

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Bill Clayton leads Customer Care and Retention Sales for NRG's retail business in Texas and the Northeast. In this role, Mr. Clayton oversees the company's engagement centers and mid-office operations for residential and small commercial customers. With over three decades of experience, Bill has in-depth knowledge of utilities and retail electric industries. Bill has managed specialized consumer programs and has held various roles within residential load management, field operations, retail marketing, community marketing, program development and retail operations. Bill graduated summa cum laude from Abilene Christian University with a bachelor's degree in Political Science.

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Summary: In the Matter of the Application of Green Mountain Energy Company