



Public Utilities Commission

Original CRS Case Number	Version
14-0113-EL-CRS	May 2016

RENEWAL APPLICATION FOR RETAIL GENERATION PROVIDERS AND POWER MARKETERS

Please print or type all required information. Identify all attachments with an exhibit label and title (Example: Exhibit C-10 Corporate Structure). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division; 180 East Broad Street, Columbus, Ohio 43215-3793.

**This PDF form is designed so that you may input information directly onto the form.
You may also download the form, by saving it to your local disk, for later use.**

A. RENEWAL INFORMATION

A-1 Applicant intends to be renewed as: (check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> Retail Generation Provider | <input checked="" type="checkbox"/> Power Broker |
| <input checked="" type="checkbox"/> Power Marketer | <input checked="" type="checkbox"/> Aggregator |

A-2 Applicant's legal name, address, telephone number, PUCO certificate number, and web site address

Legal Name Empower Gas and Electric, LLC
Address 612 Park Street Suite 200, Columbus, OH 43215
PUCO Certificate # and Date Certified 14-782E (2) 02/22/2016
Telephone # (216) 789-3320 Web site address (if any) http://www.empowersaves.com/

A-3 List name, address, telephone number and web site address under which Applicant does business in Ohio

Legal Name Empower Gas and Electric, LLC
Address 612 Park Street Suite 200, Columbus, OH 43215
Telephone # (216) 789-3320 Web site address (if any) http://www.empowersaves.com/

A-4 List all names under which the applicant does business in North America

Empower _____
Empower Saves _____

A-5 Contact person for regulatory or emergency matters

Name Tremaine Phillips
Title Director of Strategic Initiatives
Business address 612 Park Street Suite 200, Columbus, OH 43215
Telephone # (517) 488-6511 Fax # _____
E-mail address tphillips@empowersaves.com

A-6 Contact person for Commission Staff use in investigating customer complaints

Name Dan Gray
Title Chief Operations Officer
Business address 612 Park Street Suite 200, Columbus, OH 43215
Telephone # (216) 789-3320 Fax # _____
E-mail address dgray@empowersaves.com

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

Customer Service address 612 Park Street Suite 200, Columbus, OH 43215
Toll-free Telephone # 1-855-343-7884 Fax # 614-824-3502
E-mail address info@empowersaves.com

A-8 Applicant's federal employer identification number # 464059950

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

☐ Sole Proprietorship ☐ Partnership
☐ Limited Liability Partnership (LLP) ☒ Limited Liability Company (LLC)
☐ Corporation ☐ Other _____

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

A-10 Exhibit A-10 "Principal Officers, Directors & Partners" provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.

B. MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- B-1** **Exhibit B-1 "Jurisdictions of Operation,"** provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail or wholesale electric services.
- B-2** **Exhibit B-2 "Experience & Plans,"** provide a description of the applicant's experience and 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 Section 4928.10 of the Revised Code.
- B-3** **Exhibit B-3 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational status or ability to provide the services it is seeking to be certified to provide.
- B-4** Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.
☒ No ☐ Yes

If yes, provide a separate attachment labeled as **Exhibit B-4 "Disclosure of Consumer Protection Violations"** detailing such violation(s) and providing all relevant documents.

- B-5** Disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail or wholesale electric service denied, curtailed, suspended, revoked, or cancelled within the past two years.
☒ No ☐ Yes

If yes, provide a separate attachment labeled as **Exhibit B-5 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation"** detailing such action(s) and providing all relevant documents.

C. FINANCIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- C-1** **Exhibit C-1 "Annual Reports,"** provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information in Exhibit C-1 or indicate that Exhibit C-1 is not applicable and why. (This is generally only applicable to publicly traded companies who publish annual reports.)

C-2 **Exhibit C-2 “SEC Filings,”** provide the most recent 10-K/8-K Filings with the SEC. If the applicant does not have such filings, it may submit those of its parent company. An applicant may submit a current link to the filings or provide them in paper form. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that the applicant is not required to file with the SEC and why.

C-3 **Exhibit C-3 “Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements (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, it shall file 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 account numbers redacted).

C-4 **Exhibit C-4 “Financial Arrangements,”** provide copies of the applicant's financial arrangements to conduct CRES as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.,).

Renewal applicants can fulfill the requirements of Exhibit C-4 by providing a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU’s collateral requirements.

First time applicants or applicants whose certificate has expired as well as renewal applicants can meet the requirement by one of the following methods:

1. The applicant itself stating that it is investment grade rated by Moody’s, Standard & Poor’s or Fitch and provide evidence of rating from the rating agencies.
2. Have a parent company or third party that is investment grade rated by Moody’s, Standard & Poor’s or Fitch guarantee the financial obligations of the applicant to the LDU(s).
3. Have a parent company or third party that is not investment grade rated by Moody’s, Standard & Poor’s or Fitch but has substantial financial wherewithal in the opinion of the Staff reviewer to guarantee the financial obligations of the applicant to the LDU(s). The guarantor company’s financials must be included in the application if the applicant is relying on this option.
4. Posting a Letter of Credit with the LDU(s) as the beneficiary.

If the applicant is not taking title to the electricity or natural gas, enter "N/A" in Exhibit C-4. An N/A response is only applicable for applicants seeking to be certified as an aggregator or broker.

- C-5** **Exhibit C-5 “Forecasted Financial Statements,”** provide two years of forecasted income statements for the applicant’s **ELECTRIC related business activities in the state of Ohio Only**, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer. The forecasts should be in an annualized format for the two years succeeding the Application year.
- C-6** **Exhibit C-6 “Credit Rating,”** provide a statement disclosing the applicant’s credit rating as reported by two of the following organizations: Duff & Phelps, Fitch IBCA, Moody’s Investors Service, Standard & Poor’s, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or an affiliate organization, provided the applicant submits 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 “N/A” in Exhibit C-6.
- C-7** **Exhibit C-7 “Credit Report,”** provide a copy of the applicant’s credit report from Experian, Dun and Bradstreet or a similar organization. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter “N/A” for Exhibit C-7.
- C-8** **Exhibit C-8 “Bankruptcy Information,”** provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.
- C-9** **Exhibit C-9 “Merger Information,”** provide a statement describing any dissolution or merger or acquisition of the applicant within the two most recent years preceding the application.
- C-10** **Exhibit C-10 “Corporate Structure,”** provide a description of the applicant’s corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.

D. TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- D-1 Exhibit D-1 "Operations" provide a written description of the operational nature of the applicant's business. Please include whether the applicant's operations include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.
- D-2 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.
- D-3 Exhibit D-3 "Key Technical Personnel," provide the names, titles, e-mail addresses, telephone numbers, and the background of key personnel involved in the operational aspects of the applicant's business.
- D-4 Exhibit D-4 "FERC Power Marketer License Number," provide a statement disclosing the applicant's FERC Power Marketer License number. (Power Marketers only)

[Signature], COO
Signature of Applicant and Title

Sworn and subscribed before me this 16th day of February, 2018
Month Year

[Signature]
Signature of official administering oath

Gretchen L. Petrucci
Print Name and Title

My commission expires on does not expire



GRETCHEN L. PETRUCCI
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION DOES NOT EXPIRE

Exhibit A-10: Principal Officers, Directors & Partners

NAME	TITLE	ADDRESS	PHONE NUMBER
David Milenthal	CEO	612 Park Street, Suite 200 Columbus, OH 43215	855-343-7884
Daniel Gray	COO	612 Park Street, Suite 200 Columbus, OH 43215	216-789-3320
David Wilhelm	Member	612 Park Street, Suite 200 Columbus, OH 43215	855-343-7884
Nick Bullinger	Member	612 Park Street, Suite 200 Columbus, OH 43215	855-343-7884
Michael Moser	Member	612 Park Street, Suite 200 Columbus, OH 43215	855-343-7884
Scott Ungerer	Member	612 Park Street, Suite 200 Columbus, OH 43215	855-343-7884

Exhibit B-1: Jurisdictions of Operation

Empower Gas & Electric, LLC is certified, licensed, and registered to provide retail or wholesale electric and aggregation services in the state of Ohio.

Exhibit B-2: Experience & Plans

Empower Gas & Electric, LLC (Empower) intends to continue to use its experience and data analytics as a platform for providing energy solutions to customers and communities in the state of Ohio. We will fulfill customers' electricity needs by developing and deploying low-cost and high impact energy efficiency products and services.

Empower will work with strategic partners, as needed, to procure all balance of power needs for customers. Empower will ensure delivery of power from the grid either directly or contractually via strategic partners. Empower will continue to directly address and document any and all customer complaints and inquiries, and ensure that they are responded to within 3 business days and addressed in a timely manner. Empower will respond to both the customer and the PUCO within 3 days for complaints forwarded to Empower by the PUCO.

Our experience includes:

- Developing energy projects throughout the state of Ohio, both behind the meter and interconnected to the grid.
- Financing energy projects, both through direct and third-party ownership.
- Advising electric customers on utility contracts and PUCO filings, including contract and ordinance drafting.
- Developing long term retail customer relationships.
- Providing free-market energy efficiency solutions to end use customers.
- Working in partnership with electric utilities to develop and deploy low-cost and high impact energy efficiency solutions to customers and communities throughout the state of Ohio.

Exhibit B-3: Disclosure of Liabilities and Investigations

There are no existing, pending, or past rulings, judgements, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact Empower Gas & Electric, LLC's financial or operational status or ability to provide the services it is seeking to be certified to provide.

Exhibit C-1: Annual Reports

Empower Gas & Electric, LLC is not a publicly traded company and therefore has not generated an Annual Report. See financial statements under Confidential Exhibit C-3.

Exhibit C-2: SEC Filings

Empower Gas & Electric, LLC is a privately held company and therefore does not have SEC filings.

Exhibit C-3: Financial Statements

This exhibit contains confidential and proprietary information and is being submitted under seal. Empower's 2016 and 2017 balance sheet, income statement, and cash flow statements are contained in attached document containing confidential exhibits.

Exhibit C-4: Financial Arrangements

This exhibit contains confidential and proprietary information and is being submitted under seal.

Exhibit C-5: Forecasted Financial Statements

This exhibit contains confidential and proprietary information and is being submitted under seal.

Exhibit C-6: Credit Rating

N/A

Exhibit C-7: Credit Report

See below.



CreditScoreSM Report

as of: 01/11/18 12:59 ET

Empower Gas & Electric, LLC

Address:	612 Park St Columbus, OH 43215-1681 United States	Key Personnel:	Ucc Debtor: David L Mienthal Chief Operating Officer: Daniel Gray
Phone:	216-789-3320	SIC Code:	1711-Plumbing, Heating & A/C Contractors 4911-Electric Services
Website:	empowersaves.com	NAICS Code:	238220-Plumbing, Heating, And Air- Conditioning Contractors 221100-Electric Power Generation, Transmission And Distribution
Experian BIN:	989497535	Business Type:	Corporation
		Experian File Established:	August 2014
		Experian Years on File:	4 Years
		Years in Business:	More than 4 Years
		Total Employees:	11
		Sales:	\$1,684,000

This location does not yet have an estimated Days Beyond Terms (DBT), or a Payment Trend Indicator. This is often the result of too few Payment **Tradelines**.

Lowest 6 Month Balance: \$0
Highest 6 Month Balance: \$0
Current Total Account Balance: \$0
Highest Credit Amount Extended: \$0

Payment **Tradelines**: 3
Banking/Insurance/Leasing (see [detail](#)): 1
UCC Filings: 1

✗ **Businesses Scoring Worse:** 2%
✓ Bankruptcies: 0
✓ Liens: 0
✓ Judgments Filed: 0
✓ Collections: 0

Credit Summary

Experian Business Credit Score: 3



The objective of the Experian Business Credit Score is to predict payment behavior. High Risk means that there is a significant probability of delinquent payment. Low Risk means that there is a good probability of on-time payment.

Key Score Factors:

- Number of recently active commercial accounts.
- Number of commercial accounts with net 1-30 days term.
- Balance of commercial accounts at worst delinquency.
- Number of delinquent commercial accounts.

Recommended Action: High Risk

Commercial Banking, Insurance, Leasing

Commercial Banking and Insurance

Type: Commercial Banking
Institution Name: Huntington National Bank
Address: 41 S. High Street Columbus Oh43215
Phone: 317-237-2518
Open Date: 03/14

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Exhibit C-8: Bankruptcy Information

Empower Gas & Electric, LLC has no applicable bankruptcy information.

Exhibit C-9: Merger Information

Empower Gas & Electric, LLC has no applicable merger information.

Exhibit C-10: Corporate Structure

Empower Gas & Electric, LLC is a standalone limited liability company that is physically located in Columbus, Ohio. There are no affiliates or subsidiaries of Empower. The LLC is jointly owned by its members and is governed by an operating agreement. Empower Gas & Electric, LLC also operates under the registered trade name Empower Saves.

Exhibit D-1: Operations

Empower Gas & Electric, LLC plans on performing the following operations as part of its business:

- Development of Customer Sited Power Generation: For customers with a desire to develop their own power generation assets, both behind the meter and connected to the grid, Empower Gas & Electric, LLC will work with the customers to design, finance, build and operate the desired assets.
- Provision of Grid Power: For all power needed to satisfy customers' demand from the grid, Empower Gas & Electric, LLC will ensure delivery of power from the grid either by directly scheduling transmission and distribution or arranging for the power to be delivered contractually through strategic partners. Empower Gas & Electric, LLC will disclose to the customer the method of delivery.
- Customer Service: Empower Gas & Electric, LLC will directly or contractually through strategic partners, ensure that all customer complaints and inquiries are responded to within 3 business days and addressed in a timely manner. Empower Gas & Electric, LLC will respond to both the customer and the PUCO within 3 days for complaints forwarded from the PUCO. Empower will disclose to the customer a toll free phone number and email for all customer inquiries and complaints no later than when a contract is signed.

Exhibit D-2: Operations Experience

The officers and members of Empower Gas & Electric has extensive and longstanding utility service, regulation, sales, and development experience in Ohio.

Empower's team has collectively developed hundreds of megawatts of operating generating facilities regionally, nationally, and globally. Additionally, the core group includes individuals with strong electricity regulatory experience, who are well informed on Commission rules, practices, and expectations.

Experience includes:

- Participation in dozens of Commission actions, including work directly with all of Ohio's investor owned utilities, and many of their retail counterparts.
- Extensive experience in high quality customer service as well as product development and marketing for Fortune 500 companies.
- Strong relationships with bonded energy service companies, wholesale energy suppliers, and other channel partners.

Exhibit D-3: Key Technical Personnel

David Milenthal – CEO

855-343-7884

dmilenthal@empowersaves.com

Key Technical Responsibilities: Strategic partner relationships, customer services

Bio: David is the founder of what is now Engauge, a marketing services firm now owned by Publicis. Prior to selling his company to the investors, David built what became one of the largest independently owned ad agencies in America. Mr. Milenthal has helped spearhead efforts to develop brands for the nation's leading cruise line, Carnival; the nation's largest energy company, American Electric Power; one of the nation's top five health care giants, Anthem Blue Cross and Blue Shield; and other national and regional companies.

Mr. Milenthal believes in using his marketing skills and that of his company to develop campaigns that positively impact important issues and programs in his local and national community. He is the first and only marketing CEO to ever chair the United Way campaign in Central Ohio, and he also served as Chair of the United Way from 1997-99. For the past several years he has served on the National Marketing Committee and the National Leadership Council of the United Way, as well as the Resource Development Committee of United Way of Central Ohio.

David Wilhelm - Member

855-343-7884

dwilhelm@empowersaves.com

Key Technical Responsibilities: Energy project development and financing, strategic partner relationships

Bio: Wilhelm has had a career spanning the worlds of energy, finance, politics, academia, and nonprofits; in each, he has made a meaningful impact and has always been guided by the idea of doing what he can to help others fulfill their human potential.

With Hecate, Wilhelm is leading efforts to build a 50 MW solar array on reclaimed mine land in his native Appalachian Ohio, linking clean energy development to substantial rural job creation. Wilhelm is heavily involved in Hecate's Power Africa initiative, which involves

a 55 MW solar project on the campus of the University of Dodoma in central Tanzania.

Wilhelm is the founder of two regionally-focused venture capital funds designed to bring investment dollars to underserved regions of the Midwest and Appalachia. He served as the co-chair of the statewide campaign to renew the Ohio Third Frontier, one of the nation's model programs in support of innovation and entrepreneurship.

Wilhelm is a graduate of Ohio University and Harvard University; he has received honorary doctorates at Ohio University, the University of Charleston, and Wheeling Jesuit University, and has taught at Harvard University, the University of Chicago, DePaul University, and the University of Akron. He is also the Co-Chair of the National Advisory Council of the Voinovich School of Leadership and Public Affairs at Ohio University.

Daniel Gray – Chief Operations Director

216-789-3320

dgray@empowersaves.com

Key Technical Responsibilities: Operations, finances, and day-to-day management

Bio: Before joining Empower, Dan Gray served as the Business and Utility Consultant for Williams, Allwein & Moser, an advanced energy law firm based in Columbus, where he combined his knowledge of utility rates and regulations with his background in financial modeling to drive value for customers developing complex energy development projects. Dan managed the energy development portfolio for the firm, including projects ranging from distributed power generation at individual businesses to community-wide energy efficiency retrofit programs. He regularly consults with both end users and developers in the public, private and non-profit sectors.

Prior to his work in energy development, Dan ran community engagement programs for successful political campaigns across the country, including the election of two governors, two Senators and nine Congressmen.

Dan is a graduate of Case Western Reserve University and earned his MBA at The Ohio State University.

Scott Ungerer - Board Member and Strategic Advisor

610-457-4096 sungerer@enertechcapital.com

Key Technical Responsibilities: Member and advisor

Scott has been a visionary and recognized leader in venture capital investing for the traditional and advanced energy sectors for nearly 20 years. Currently, Scott works with tech and utility companies that aim to reduce the cost and/or improve the customer experience related to all aspects of energy supply, delivery and usage.

His specific areas of experience, interest and expertise include companies that sell into the following industry sectors: central and distributed power generation; electric transmission; electric, natural gas and/or water distribution; energy management for the customer premise; broadly defined smart grid; and transportation.

Scott has worked with more than 15 early-to-mid stage companies providing both strategic and operational guidance and advice as a board member and investor. He currently sits on the boards of GeoDigital Inc. (Chairman), The NanoSteel Company, Tangent Energy Solutions (Chairman), Enbala Power Networks, and N-Dimension Solutions Inc. Scott managed investments in and formerly sat on the boards of Clean Air Power Group, Catalytic Solutions, Enerwise, Intellon, and CoaLogix.

Prior to EnerTech, Scott spent 16 years in the power industry as an operating executive with Atlantic Energy culminating in his role as one of five senior officers, and as President & COO of the entire set of the company's non-regulated enterprises.

Scott received a BS in Mechanical Engineering from Princeton University; he has also attended several graduate level Business, Strategy and Management courses at Wharton.

Exhibit D-4: FERC Power Marketer License Number

A FERC Power Marketer license number is not yet available for Empower Gas & Electric, LLC.

AFFIDAVIT

State of Ohio :

Columbus ss.
(Town)

County of Franklin :

Daniel Gray, Affiant, being duly sworn/affirmed according to law, deposes and says that:
He/She is the Chief Operations Officer (Title of Affiant) of Empower Gas and Electric, LLC (Name of Applicant);

That he/she is authorized to and does make this affidavit for said Applicant,

1. The Applicant herein, attests under penalty of false statement that all statements made in the application for certification renewal are true and complete and that it will amend its application while the application is pending if any substantial changes occur regarding the information provided in the application.
2. The Applicant herein, attests it will timely file an annual report with the Public Utilities Commission of Ohio of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Division (A) of Section 4905.10, Division (A) of Section 4911.18, and Division (F) of Section 4928.06 of the Revised Code.
3. The Applicant herein, attests that it will timely pay any assessments made pursuant to Sections 4905.10, 4911.18, or Division F of Section 4928.06 of the Revised Code.
4. The Applicant herein, attests that it will comply with all Public Utilities Commission of Ohio rules or orders as adopted pursuant to Chapter 4928 of the Revised Code.
5. The Applicant herein, attests that it 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 herein, attests that it will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
7. The Applicant herein, attests that it will fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
8. The Applicant herein, attests that it 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 herein, attests that it 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, the Applicant herein, attests that 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. (Only applicable if pertains to the services the Applicant is offering)

11. The Applicant herein, attests that it will inform the Commission of any material change to the information supplied in the renewal 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 customer complaints.

That the facts above set forth are true and correct 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.

LEON M. B., COO
Signature of Affiant & Title

Sworn and subscribed before me this 16th day of February 2018
Month Year

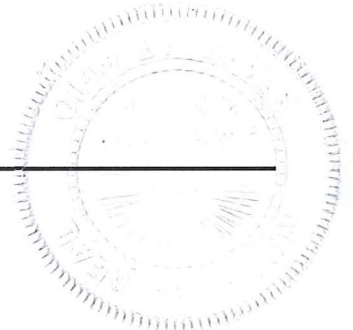
Gretchen L. Petrucci
Signature of official administering oath

Gretchen L. Petrucci
Print Name and Title

My commission expires on does not expire



GRETCHEN L. PETRUCCI
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION DOES NOT EXPIRE



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in

Case No(s). 14-0113-EL-CRS

Summary: Application Renewal Application for Retail Generation Providers and Power Marketers electronically filed by Mrs. Gretchen L. Petrucci on behalf of Empower Gas and Electric, LLC