Ohio Public Utilities Commission

PUCO USE O	NLY - Version 1.08	
Date Received	Renewal Certification	ORIGINAL AGG
	Number	Case Number
		16 - 0344 - GA-AGG

FILE

RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS BROKERS/AGGREGATORS

Please type or print all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit A-15 - Company History*). 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 directly input information onto the form. You may also download the form by saving it to your local disk.

	<u>i.</u>	SECTION A - A	APPLICANT IN	FURMATIO	N AND SE	RVICES	
A-1		nds to renew its c al Gas Aggregator	`	check all that tural Gas Bro	,		*:: RECEIVED-COCKETING 2018 FEB 28 PM 2: 5
A-2	Applicant info	rmation:				G)-∂.c.(28
	Legal Name Address	Extriciti, LLC 4041 N. High St., Sui	te 202 Columbus,	OH 43214		0	65:2 HJ
	Telephone No.	614-888-8810		Web site	Address	www.extriciti.com	
	Current PUCO Ce	rtificate No.	-501G(1)	Effective Dates	3/18/2016	5 - 3/18/2018	arting cass of the
A-3	Applicant info	rmation under w	hich applicant	will do busir	ness in Ohi	0:	: 1
	Name Address	Extriciti 4041 N. High St., Su	ite 202 Columbus,	OH 43214			iraçes ap action of ilar coure Processed
	Web site Address	www.extriciti.com		Telephor	ne No. 614-8	88-8810	
A-4	List all names Extriciti	under which the	applicant does	business in I	North Ame	erica:	Tilly that the Complete nopical in the regi
A-5	Contact person	n for regulatory o	r emergency n	natters:			
	Name Greg Bech			Title	Member		is to rate a cent a
	Business Address	4041 N. High ST., S	suite 202 Columbs,	, UH 43214			The Chair of the C
	Telephone No. 61	14-888-8810	Fax No.		Email Addre	ess gfbechert@ex	xtriciti.com ಶಕ್ಕ

A-6	Contact person for Commission Staff use in investigating customer complaints:						
	Name Greg Bechert		Title Member				
	Business address 4041 N. High St., Suite 202 Columbus, OH 43214						
	Telephone No. 614-888-8810	Fax No.	Email Address	gfbechert@extriciti.com			
A-7	Applicant's address and toll	l-free number for c	ustomer service and comp	olaints			
	Customer service address 4041	N. High St.,Suite 202 Co	olumbus, OH 43214				
	Toll-Free Telephone No. 614-888-	-8810 Fax No.	Email Add	tress gfbechert@extriciti.com			
A-8	Provide "Proof of an Ohio C Revised Code, by listing nan designated Ohio Employee						
	Name Greg Bechert		Title Member				
	Business address 4041 N. High St., Suite 202 Columbus, OH 43214						
	Telephone No. 614-888-8810	Fax No.	Email Address gfbe	echert@extriciti.com			
A-9	Applicant's federal employe	r identification nui	nber 81-1319020				
A-10	Applicant's form of owners	hip: (Check one)					
	Sole Proprietorship		Partnership				
	Limited Liability Partners	hip (LLP)	✓ Limited Liability Con	mpany (LLC)			
	Corporation		Other				
A-11	(Check all that apply) Iden currently providing service class that the applicant is	or intends to provi	de service, including iden	tification of each customer			

A-11 (Check all that apply) Identify each natural gas company service area in which the applicant is currently providing service or intends to provide service, including identification of each customer class that the applicant is currently serving or intends to serve, for example: residential, small commercial, and/or large commercial/industrial (mercantile) customers. (A mercantile customer, as defined in Section 4929.01(L)(1) of the Ohio Revised Code, means a customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within the state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside of this state. In accordance with Section 4929.01(L)(2) of the Ohio Revised Code, "Mercantile customer" excludes a not-for-profit customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within this state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside this state that has filed the necessary declaration with the Public Utilities Commission.)

	√c	olumbia Gas of Ohio	\checkmark	Residential v	Small (Commercial	\checkmark	Large Comm	ercial / Indust	rial
	√ D	ominion East Ohio	\checkmark	Residential	Small	Commercial	\checkmark	Large Comm	ercial / Indust	rial
	√ 1	Ouke Energy Ohio	√	Residential	Small	Commercial	\checkmark	Large Comm	ercial / Indust	rial
	√ v	ectren Energy Delivery	of Ohio 🗸	Residential	Small	Commercial	\checkmark	Large Comm	ercial / Indust	rial
A-12	Program	ant or an affiliate s, for each service nat the applicant l	e area and	customer c	lass, pro	vide appro	•			
	Colum	ibia Gas of Ohio								
		Residential	Beginning l	Date of Service	•	E	nd I	Pate		
		Small Commercial	Beginning l	Date of Service	•	E	nd I	ate		
		Large Commercial	Beginning l	Date of Service	:	E	nd I	ate		
		Industrial	Beginning l	Date of Service	•	E	nd I	Date		
	Domin	ion East Ohio								
		Residential	Beginning l	Date of Service	:	Æ	nd I	Date		
		Small Commercial	Beginning l	Date of Service	!	E	nd I	Date		
		Large Commercial	Beginning l	Date of Service	!	E	nd I	Date		
		Industrial	Beginning 1	Date of Service	!	E	nd I	Date		
	Duke l	Energy Ohio								
	П	Residential	Beginning l	Date of Service	:	E	nd I	ate		
		Small Commercial	Beginning l	Date of Service	!	E	nd E	Pate		
		Large Commercial	Beginning l	Date of Service	•	E	nd I	ate		
		Industrial	Beginning l	Date of Service	:	E	nd I	Pate		
	Vectr	en Energy Delivery o	f Ohio							
		Residential	Beginning l	Date of Service	•	E	nd I	Pate		
		Small Commercial	Beginning l	Date of Service	•	E	nd I	ate		
		Large Commercial	Beginning l	Date of Service	•	E	nd [ate		
		Industrial	Beginning l	Date of Service	;	E	nd I	ate		

A-13 If not currently participating in any of Ohio's four Natural Gas Choice Programs, provide the approximate start date that the applicant proposes to begin delivering services:

\checkmark	Columbia Gas of Ohio	Intended Start Date	September, 2018
\checkmark	Dominion East Ohio	Intended Start Date	September, 2018
\checkmark	Duke Energy Ohio	Intended Start Date	September, 2018
$\overline{\checkmark}$	Vectren Energy Delivery of Ohio	Intended Start Date	September, 2018

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- A-14 Exhibit A-14 "Principal Officers, Directors & Partners," provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.
- A-15 Exhibit A-15 "Company History," provide a concise description of the applicant's company history and principal business interests.
- A-16 Exhibit A-16 "Articles of Incorporation and Bylaws," provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto, only if the contents of the originally filed documents changed since the initial application.
- A-17 Exhibit A-17 "Secretary of State," provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- **B-1** Exhibit B-1 "Jurisdictions of Operation," provide a current 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 natural gas service, or retail/wholesale electric services.
- B-2 <u>Exhibit B-2 "Experience & Plans,"</u> provide a current 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 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.
- **B-3** Exhibit B-3 "Summary of Experience," provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking renewed certification (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).
- B-4 <u>Exhibit B-4 "Disclosure of Liabilities and Investigations,"</u> provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocations 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 for which it is seeking renewed certification since applicant last filed for certification.

B-5	Exhibit B-5 "Disclosure of Consumer Protection Violations," disclose whether the applicant,
	affiliate, predecessor of the applicant, or any principal officer of the applicant has been convicted or held
	liable for fraud or for violation of any consumer protection or antitrust laws since applicant last filed for
	certification.

✓	No	Yes
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If Yes, provide a separate attachment labeled as <u>Exhibit B-5 "Disclosure of Consumer Protection Violations</u>," detailing such violation(s) and providing all relevant documents.

B-6 Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation," disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, or revoked, or whether the applicant or predecessor has been terminated from any of Ohio's Natural Gas Choice programs, or been in default for failure to deliver natural gas since applicant last filed for certification.

/	No	Г	Yes
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If Yes, provide a separate attachment, labeled as <u>Exhibit B-6</u> "Disclosure of Certification Denial, <u>Curtailment, Suspension, or Revocation,</u>" detailing such action(s) and providing all relevant documents.

SECTION C - APPLICANT 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, labeled as 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 <u>Exhibit C-2 "SEC Filings,"</u> provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 whether the applicant is not required to file with the SEC and why.
- C-3 <u>Exhibit C-3 "Financial Statements</u>," 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 <u>Exhibit C-4 "Financial Arrangements,"</u> provide copies of the applicant's financial arrangements to satisfy collateral requirements to conduct retail electric/gas business activity (e.g., parental or third party guarantees, 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 NATURAL GAS 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 current 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 current credit report from Experion, 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.

SECTION D - APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- **D-1** Exhibit D-1 "Operations," provide a current written description of the operational nature of the applicant's business functions.
- **D-2** Exhibit D-2 "Operations Expertise," given the operational nature of the applicant's business, provide evidence of the applicant's current experience and technical expertise in performing such operations.

D-3 Exhibit D-3 "Key Technical Personnel," provide the names, titles, email addresses, telephone numbers, and background of key personnel involved in the operational aspects of the applicant's current business.

Applicant Signature and Title

Sworn and subscribed before me this

26TH day of February

Month

9/29/2020

7.018

Vear

of official administering oath

Sean Hannigan, Notary Public
Print Name and Title

SEAN M. HANNIGAN My commission expires on

Notary Public, State of Ohio My Commission Expires September 29, 2020



The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service Affidavit Form (Version 1.07)

In	the Matter of the Application of)						
Ext	riciti, LLC Case No. 16 - 0344 -GA-AGG						
for	for a Certificate or Renewal Certificate to Provide						
Co	Competitive Retail Natural Gas Service in Ohio.						
	unty of Franklin te of Ohio						
	Gregory F Bechert [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.						
(2)	The applicant will timely file an annual report of its intrastate gross receipts and sales of hundred cubic feet of natural gas pursuant to Sections 4905.10(A), 4911.18(A), and 4929.23(B), Ohio Revised Code.						
(3)	The applicant will timely pay any assessment made pursuant to Section 4905.10 or Section 4911.18(A), Ohio Revised Code.						
(4)	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)) Applicant will cooperate with the Public Utilities Commission of Ohio and its staff in the investigation of any consumer complaint regarding any service offered or provided by the applicant.						
(6)	Applicant will comply with Section 4929.21, Ohio Revised Code, regarding consent to the jurisdiction of the Ohio courts and the service of process.						
(7)	Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the certification or certification renewal application within 30 days of such material change, including any change in contact person for regulatory or emergency purposes or contact person for Staff use in investigating customer complaints.						
(8)	Affiant further sayeth naught.						
	Affiant Signature & Title AMNUS						
	Sworn and subscribed before me this 26TH day of February Month 2018 Year						
/.	Sean Hannigan, Notary Public						
1	Signature of Official Expring Pathan Print Name and Title						
*	Notary Public, State of Ohio						
/	My Commission Expires September 29, 2020 My commission expires on 9/29/2020						

Exhibit A-14 "Principal Officers, Directors & Partners

Gregory F. Bechert, Managing Partner 4041 North High Street, Suite 202 Columbus, OH 43214-3248 Phone: 614-888-8805, Ext. 101

Fax: 614-453-8811

gfbechert@sciotoenergy.com

Susanne Buckley, Managing Partner 4041 North High Street, Suite 202 Columbus, OH 43214-3248 Phone: 614-888-8805, Ext. 104

Fax: 614-453-8811

sbuckley@sciotoenergy.com

Exhibit A-15 "Company History"

Extriciti, LLC is a web-based platform/portal that enables small businesses and residential alike to quickly identify all of the possible pricing options and terms from participating wholesale suppliers based on the specific end-use data provided by the participating entity. Extriciti is completely independent from any wholesale supplier.

Extriciti was created and developed by Greg Bechert and Susanne Buckley in 2016. These two seasoned energy professionals have over 40 years of experience in both energy trading and energy retail marketing, and are the founders of Scioto Energy, the largest energy brokerage and consulting firm in Ohio with over 7,000 accounts under management. In 2013, the company was recognized as one of the 50 fastest growing companies in Central Ohio (#18), and both partners were included in the "Who's Who of Energy", a publication which recognized the top energy leaders throughout United States.

Exhibit A-16 "Articles of Incorporation and Bylaws

No Changes have been made to the Articles of Incorp-	oration since	original filed.
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Exhibit A-17 "Secretary of State"

Attached please find evidence that Extriciti, L	C is currently registered with the	Ohio Secretary of State
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Jon Husted & the Office | Elections & Voting | Campaign Finance | Legislation & Ballot Issues | Businesses | Records | Media Center |
Publications

The second secon	your BI
Business filing fortal	INESS begins here

Corporation Details

	Corporat	tion Details	
Entity Number	3857098		
Business Name	EXTRICITI, LLC		
Filing Type	DOMESTIC LIMITED LIABILITY COMPANY		
Status	Active		
Original Filing Date	01/29/2016		
Expiry Date			
Location:	County: State:		State:
, , , , , , , , , , , , , , , , , , ,	Agent / Regist	trant Information	
	7650 RIVERS EDG COLUMBU Effective Da	CASSIDY, ESQ. SE DRIVE, SUITE 101 US,OH 43235 Ite: 01/29/2016 Status: Active	
	Incorporate	or Information	
	SHAMUS B.	CASSIDY, ESQ.	
	Fi	lings	
Filing Type		Date of Filing	Document Number/Image
ARTICLES OF ORGNZ	N/DOM. PROFIT LIM.LIAB, CO.	01/29/2016	201602900370

Exhibit B-1 "Jurisdictions of Operations"

As of this filing, Extriciti, LLC is not licensed as a brokerage firm in any other jurisdiction.

Exhibit B-2 "Experience & Plans"

Extriciti, LLC is a web-based platform that allows small businesses and residential customers alike to quickly identify multiple wholesale energy opportunities based on specific procurement identifiers. Extriciti functions as an independent brokerage firm, and thus is supplier agnostic. This in turn means that Extriciti is not taking title to any energy and therefore does not provide any energy related billing statements to customers. In addition, because the company does not take title to the electricity, it is not a party to any agreements between customer and supplier, merely a conduit.

The managing partners of Extriciti are seasoned energy professions with over 43 years of experience in both energy trading and energy retail marketing. Their extensive knowledge of utility structures, tariffs, and wholesale modeling allows Extriciti to deliver crucial and unbiased information to clients, which empowers them to make the best decisions regarding implementation of risk strategies that are in line with corporate goals.

Greg Bechert has been involved in the energy retail industry since 1995, beginning with Enron Capital and Trade, where his initial focus was natural gas end-use customers throughout the Midwest region, specifically in Indiana, Michigan, and Ohio. Over seven years, his role and responsibilities expanded to include marketing electricity in Massachusetts, Illinois and Texas. In 2003, Mr. Bechert joined Constellation NewEnergy (CNE) where his knowledge and background assisted CNE in its marketing campaigns under Cinergy's and FirstEnergy's Market Development Plans. He went on to manage CNE's Midwest sales team, and was instrumental in leading the company's sales efforts behind the Ameren footprint in Southern Illinois, and eventually expanded his responsibilities to include the ComEd market throughout Chicagoland. In 2009, he started Scioto Energy, Ohio's largest energy brokerage and consulting firm. Greg was recognized as a 2013 Who's Who in Energy, and in 2013 help found the Energy Professionals of Ohio association, where he currently serves as Chairman.

Susanne Buckley began her energy career in 1992 when she joined American Electric Power as an environmental engineer, which provided the foundation for her extensive knowledge of utility rate structures developed over the years. Ms. Buckley moved to the deregulated side when she joined American Electric Power Energy Services in 1998 where she gained experience in operations, trading, structuring deals and marketing. In 2005, Ms. Buckley joined Integrys Energy Services where she led the residential mass markets efforts for deregulated natural gas and electricity sales and also directed the commercial and industrial sales efforts for the Midwest region. In 2009, Susanne joined Scioto Energy and assisted in its efforts to become a leading brokerage and consulting firm in the Midwest. In 2013, she was recognized as a Who's Who in Energy, and in 2014, she was recognized as one of the Top 20 Energy Professionals by Business First.

Exhibit B-3 "Summary of Experience"

Extriciti, LLC began marketing electricity in May of 2017 behind all of Ohio's investor owned utilities. Extriciti does not use direct sales reps or agents, telemarketing or Door-to-Door sales tactics, instead focuses 100% of its efforts via inbound marketing, pay-per-click and search engine optimization tactics in its efforts to draw potential customers to its shopping platform.

Exhibit B-4 "Disclosure of Liabilities and Investigations"

As of this filing, Extriciti is not aware of any existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact its financial or operational status or ability to provide the services it is seeking to be certified to provide.

Exhibit C-1 "Annual Reports"

Extriciti, LLC is not a publicly traded entity and does not have an annual report.

Exhibit C-2 "SEC Filings"

Extriciti, LLC is an energy brokerage firm and does not take title to the natural gas. In addition, Extriciti is not a public entity and therefore no SEC filings are required.

Exhibit C-4 "Financial Arrangements"

As an energy brokerage firm. Extri	i, LLC does not require any loans to operate.
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Exhibit C-6 "Credit Rating"

Extriciti, LLC does not have a D&B number and therefore does not have a published credit rating.

Exhibit C-7 "Credit Report"

Since Extriciti, LLC does not require any loans/	credit to operate and	l does not have a D&B	number, no credit
reports are available.			

Exhibit C-8 "Bankruptcy Information"

Extriciti,	LLC has not had any	/ reorganization,	protection from	creditors or any	other form of	bankruptcy f	ilings
ever.							

Exhibit C-9 "Merger Information"

Extriciti, LLC has had no dissolution or merger or acquisitions within t	the five most recent years preceding this
application.	

Exhibit C-10 "Corporate Structure"

Extriciti, LLC is an Ohio Limited Liability Company with two managing partners and no affiliate or subsidiary companies that supply retail or wholesale electricity or natural gas to customers and companies that aggregate customers in North America.

Exhibit D-1 "Operations"

Extriciti, LLC anticipates the following staff team members:

Procurement Manager – individual responsible for managing the daily matrix offers of participating wholesale suppliers

Contract Administration/Pre-enrollment – individual responsible for reviewing all agreements prior to submission to supplier for booking

Contract Administration/Post enrollment – individual responsible for handling any issues after the deal has been confirmed to be hedged and enrolled by the supplier such as late enrollments, early drop notifications, etc. Analyst – Ongoing analysis validating performance of existing agreement with supplier as well as impact analysis for pending rate cases

Exhibit D-2 "Operations Expertise"

The two partners of Extriciti, LLC are currently owners of a very successful brokerage and consulting firm (New River Group, LLC). The experience they have garnered over the last seven years in developing a company that has successfully acquired and managed over 7,000 accounts will transfer seamlessly to Extriciti. The owners have invested significant dollars in building a platform that manages wholesale offers/pricing, customer contracts and broker commissions.

Exhibit D-3 "Key Technical Personnel"

Gregory F. Bechert, Member 4041 North High Street, Suite 202 Columbus, OH 43214-3248 Phone: 614-888-8805, Ext. 101

Fax: 614-453-8811

gfbechert@sciotoenergy.com

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Susanne Buckley, Managing Partner 4041 North High Street, Suite 202 Columbus, OH 43214-3248 Phone: 614-888-8805, Ext. 104

Fax: 614-453-8811

sbuckley@sciotoenergy.com

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