

Original CRS Case Number	Version
11 - 625 -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.
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A. RENEWAL INFORMATION

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

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

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

Legal Name Energy Plus Holdings LLC
 Address 3711 Market St. Suite 1000, Philadelphia, PA 19104
 PUCO Certificate # and Date Certified 11-341E (1), 03/07/2011
 Telephone # (866) 698-0912 Web site address (if any) www.energypluscompany.com

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

Legal Name Energy Plus Holdings LLC
 Address 3711 Market St. Suite 1000, Philadelphia, PA 19104
 Telephone # (866) 698-0912 Web site address (if any) www.energypluscompany.com

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

Energy Plus Holdings LLC _____

A-5 Contact person for regulatory or emergency matters

Name Lindsay Cervenak
Title Regulatory Analyst
Business address 3711 Market St. Suite 1000, Philadelphia, PA 19104
Telephone # (267) 295-5843 Fax # _____
E-mail address lindsay.cervenak@nrg.com

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

Name Latisha Suarez
Title Regulatory Complaints Analyst
Business address 3711 Market St. Suite 1000, Philadelphia, PA 19104
Telephone # (267) 295-5798 Fax # (800) 520-8189
E-mail address energypluscomplaints@nrgenergy.com

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

Customer Service address P.O. Box 38815, Philadelphia, PA 19104
Toll-free Telephone # (866) 698-0912 Fax # (800) 520-8189
E-mail address OHSupport@EnergyPlusCompany.com

A-8 Applicant's federal employer identification number # 743216390

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

- | | |
|--------------------------------------------------------------|---------------------------------------------------------------------|
| <input type="checkbox"/> Sole Proprietorship | <input type="checkbox"/> Partnership |
| <input type="checkbox"/> Limited Liability Partnership (LLP) | <input checked="" type="checkbox"/> Limited Liability Company (LLC) |
| <input type="checkbox"/> Corporation | <input type="checkbox"/> 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 of Applicant and Title

Sworn and subscribed before me this 1st day of February, 2019
Month Year


Signature of official administering oath

Lindsay Cervenak
Print Name and Title

My commission expires on 10/24/20

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Lindsay Marie Cervenak, Notary Public
City of Philadelphia, Philadelphia County
My Commission Expires Oct. 24, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

AFFIDAVIT

State of Pennsylvania :

Philadelphia ss.
(Town)

County of Philadelphia :

Mike Starck, Affiant, being duly sworn/affirmed according to law, deposes and says that:

He/She is the Vice President (Office of Affiant) of Energy Plus Holdings 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.


Signature of Affiant & Title

Sworn and subscribed before me this 1st day of February, 2019
Month Year


Signature of official administering oath

Lindsay Cervenak
Print Name and Title

My commission expires on 10/24/20

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Lindsay Marie Cervenak, Notary Public
City of Philadelphia, Philadelphia County
My Commission Expires Oct. 24, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

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.

Name	Title	Address	Telephone
Elizabeth Killinger	President	910 Louisiana Street Houston, TX 77002	609-524-4500
David Callen	Vice President	804 Carnegie Center Princeton, NJ 08540	609-524-4500
Leonard Gardner	Vice President	910 Louisiana Street Houston, TX 77002	609-524-4500
Daniel Keane	Vice President	804 Carnegie Center Princeton, NJ 08540	609-524-4500
Krishna Koomar	Vice President	804 Carnegie Center Princeton, NJ 08540	609-524-4500
Glen Mackey	Vice President	804 Carnegie Center Princeton, NJ 08540	609-524-4500
Mike Starck	Vice President	3711 Market St. Suite 1000 Philadelphia, PA 19104	609-524-4500
Meigs Jones	Vice President & Secretary	1005 Congress, Suite 950 Austin, Texas 78701	609-524-4500
Gaetan Frotte	Treasurer	804 Carnegie Center Princeton, NJ 08540	609-524-4500
Deborah R. Fry	Assistant Secretary	804 Carnegie Center Princeton, NJ 08540	609-524-4500
Judith Tompkins	Assistant Secretary	804 Carnegie Center Princeton, NJ 08540	609-524-4500

NRG Retail Affiliates

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.

State	Energy Plus Holdings LLC 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Independence Energy Group LLC d/b/a Giro Energy 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Energy Plus Natural Gas LLC 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Green Mountain Energy Company 3711 Market Street, Suite 1000 Philadelphia, PA 19104	XOOM Energy (State), LLC 11208 Statesville Road Suite 200 Huntersville, NC 28078	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
GA	Electric: Docket 09-01-21					No licensing requirement			
CT	Electric: Docket 11-11-04	Electric: Docket 11-05-20		Electric: Docket 13-01-18	Electric: Docket 13-01-18	Electric: 11-06-05			
DE	Electric: Order 7698	Electric: Docket No. 10-404 Order Nos. 7894 (C&I) & 8035 (Res)		Electric: Docket No. 11-313 Order No. 8036	Electric: Docket No. 11-313 Order No. 8036	Electric: Docket No. 12-563 Order No. 8318			
DC	EA 11-6-5			Electric: EA 10-15	Electric: EA 11-16	Electric: EA 2013-28			
GA						Natural Gas: GW-45			
IL	Electric: Docket No. 10-0497	Electric: Docket No. 11-0277		Electric: Docket #11-0504 Natural Gas: Docket #15-0179	Electric: Docket No. 12-0477 & 11-0326 Natural Gas: Docket No. 16-0354	Electric: Docket No. 11-0705 Natural Gas: Docket No. 11-0724			
IN						No licensing requirement			
KY						No licensing requirement			
ME				Electric Docket 2015-00224 Electric: IR-2058	Electric: IR-2790 & IR-2345 Natural Gas: IR-3752	Electric: Docket # 2012-00596 Electric: IR-2445			
MD	Electric: IR-1805		Natural Gas: IR-2216	Natural Gas: IR-3480	Natural Gas: IR-3752	Natural Gas: IR-2446			
MA	Electric: CS-072			Electric: CS-081	Electric: CS-083	Electric: CS-088			
MA				Natural Gas: RA-154		Natural Gas: GS-BA-07			
MI						Natural Gas: U-16802			
NH	Electric: ESL-0087	Electric: ESL-0100	Natural Gas: ESL-0100	Electric: ESL-0093 Natural Gas: ESL-0176	Electric: ESL-0098	Electric: ESL-0115 Natural Gas: ESL-0112			
NJ			Natural Gas: Licensed - no license # given (ESCO Code EPGS)	Licensed - no license # given (ESCO Code RELI)	Electric & Natural Gas: Licensed - no license # given	Electric & Natural Gas: Licensed - no license # given ESCO Code: XOOM			
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	ESCO eligibility letter dated 8/26/11 NGSCO eligibility letter dated 2/17/15	ESCO eligibility letters dated 4/8/2009 and 8/3/2011	ESCO/NGSCO eligibility letter dated: 5/21/12			
OH	Electric:11-341E	Electric: 12-552E	Natural Gas: 11-222G	Electric: 11-401E Natural Gas: 17-591G	Electric: 18-0483E	Electric: 13-716F Natural Gas: 11-223G			
PA	Electric: A-2009-2139745	Electric: A-2011-226337 Natural Gas: A-2013-239649		Electric: A-2010-2192350 Natural Gas: A-2015-2478293	Electric: A-2011-2229050 Natural Gas: A-2017-2583732	Electric: A-2012-228821 Natural Gas: A-2012-2283967			
RI				Electric: Docket D-96-6(P7)		Electric: D-96-6(A6)			
TX					Electric:10009	Electric: 10203	Electric:10007	Electric:10177	Electric:10178
VA				Electric: E-32		Natural Gas: G-37			
Alberta						Electric: File No. 342997 Natural Gas: File No. 342996			
Ontario						Electric: EF-2016-0227 Natural Gas: GM-2016-0226			

Updated December 2018

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.

Energy Plus Holdings LLC utilizes a mix of marketing channels to reach potential customers and utilizes utility consolidated billing to provide billing statements to customers. Energy Plus has an in-house 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 Energy Plus 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 New York, Connecticut, New Jersey, Pennsylvania, Maryland, Illinois, Ohio, and Massachusetts.

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

- Call center management has the necessary skills and qualifications that meet Energy Plus' standards on customer service and support for both email and call-in inquiries. This entails having a hands-on management team that is focused on developing, implementing, and managing the appropriate processes to ensure delivery and compliance with all rules, including providing service to any qualified applicant without discrimination, delivering the appropriate documents to customers, and accurately communicating and adhering to customer rights policies.
- Call center personnel receive appropriate training to ensure knowledge of, and compliance with, all rules. In addition to initial training, representatives will be provided with additional training as needed to maintain knowledge of current rules. Floor supervisors and managers are also available to respond to emails or assist customers who call in as necessary.
- Energy Plus has designed and implemented specific processes supporting the collection, tracking, and resolution of customer's complaints in a timely manner. Additional processes have been developed to ensure compliance of the necessary policies and timeframes.
- Energy Plus has made the Anti-Discrimination Rules easily accessible by the company's employees on a regular basis.
- Energy Plus has made customers aware of the process to file a complaint with Energy Plus and how to contact the Public Utilities Commission of Ohio.

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.

Response:

Energy Plus Holdings LLC ("EPH") previously provided information regarding investigations in connection with the sale or deliver of electricity or natural gas as well as information regarding pending litigation in connection with its prior renewal applications. In connection with its 2019 renewal application, EPH states that there have been no investigations in Ohio or any other state or federal jurisdiction of EPH or its key operating personnel, officers, directors, partners, owners or listed stakeholders, in connection with the sale or delivery of electricity or natural gas, other than those previously disclosed. EPH updates the previously provided information as follows:

A. Energy Plus Holdings, LLC:

- I. ***Petition of George Jepsen. Attorney General for the State of Connecticut, and the Office of Consumer Counsel for an Investigation into the Matter and Operation of Energy Plus Holdings LLC:*** This matter has been resolved. The settlement was approved by the Public Utilities Regulatory Authority, State of Connecticut, on June 11, 2014 and the proceeding was closed.
- II. ***Subpoena of Energy Plus Holdings LLC and Energy Plus Natural Gas LLC by the Attorney General of the State of New York:*** This matter has been resolved pursuant to the terms of a settlement agreement with an effective date of August 28, 2017.

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.)

Response:

Energy Plus Holdings LLC does not prepare stand- alone audited financial statements, but is included in the financial statements of NRG Energy, Inc., its ultimate parent company.

NRG Energy, Inc.'s two most recent Annual Reports can be found at the following link:

<http://investors.nrg.com/phoenix.zhtml?c=121544&p=irol-reportsannual>

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.

Response:

Energy Plus Holdings LLC does not prepare stand- alone audited financial statements, but is included in the financial statements of NRG Energy, Inc., its ultimate parent company.

NRG Energy, Inc.'s most recent 10-K/8-K Filings can be found here: <http://www.nrgenergy.com/sec>

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).

Response:

Energy Plus Holdings LLC does not prepare stand- alone audited financial statements, but is included in the financial statements of NRG Energy, Inc., its ultimate parent company.

NRG Energy, Inc.'s two most recent audited financial statements are included in its 10Ks and can be found here: <http://www.nrgenergy.com/sec>

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.

Response:

See **Exhibit C-4.1** for a letter from Duke Energy.



February 1, 2019

Energy Plus Holdings LLC has met the Electric Collateral obligations for Duke Energy Corporation as of February 1, 2019.

Tom Hunt

Duke Energy Corp
Certified Supplier Business Center
Tom.Hunt@Duke-Energy.com



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.

Response:

This exhibit contains confidential and proprietary information and has been submitted under seal.

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.

Response:

Energy Plus Holdings LLC (DUNS# 80-489-1849) does not have a credit rating, but its ultimate parent, NRG Energy, Inc.'s credit rating from Moody's and Standard & Poor's are attached, along with a statement by Mike Starck regarding NRG Energy, Inc. guaranteeing the obligations of Energy Plus Holdings LLC as **Exhibit C-6.1**.

EXHIBIT C-6.1

ABOUT US ▾ REGULATORY AFFAIRS CAREERS T



Search ratings, research, analysts, and more...

TRENDING RESEARCH RATINGS TOOLS & DATA EVENTS & TRAINING

Linda

NRG Energy, Inc.

Ticker: **NRG** Moody's Org ID: **806927478** LEI: **5E2UPK5SW04M13XY7I38** Market Segment: **Corporates**
Industry: **ENERGY: UNREG - ELECTRIC PRODUCTION** Peer Group: **Unreg Utilities and Unreg Power Companies**
Domicile: **UNITED STATES**

ANALYST

Analyst: **Toby Shea**

LONG TERM RATING

Rating: **Ba2**, Not on Watch
Type: **LT Corporate Family Ratings - Dom Curr**
Date: **06 Dec 2018**

SHORT TERM RATING

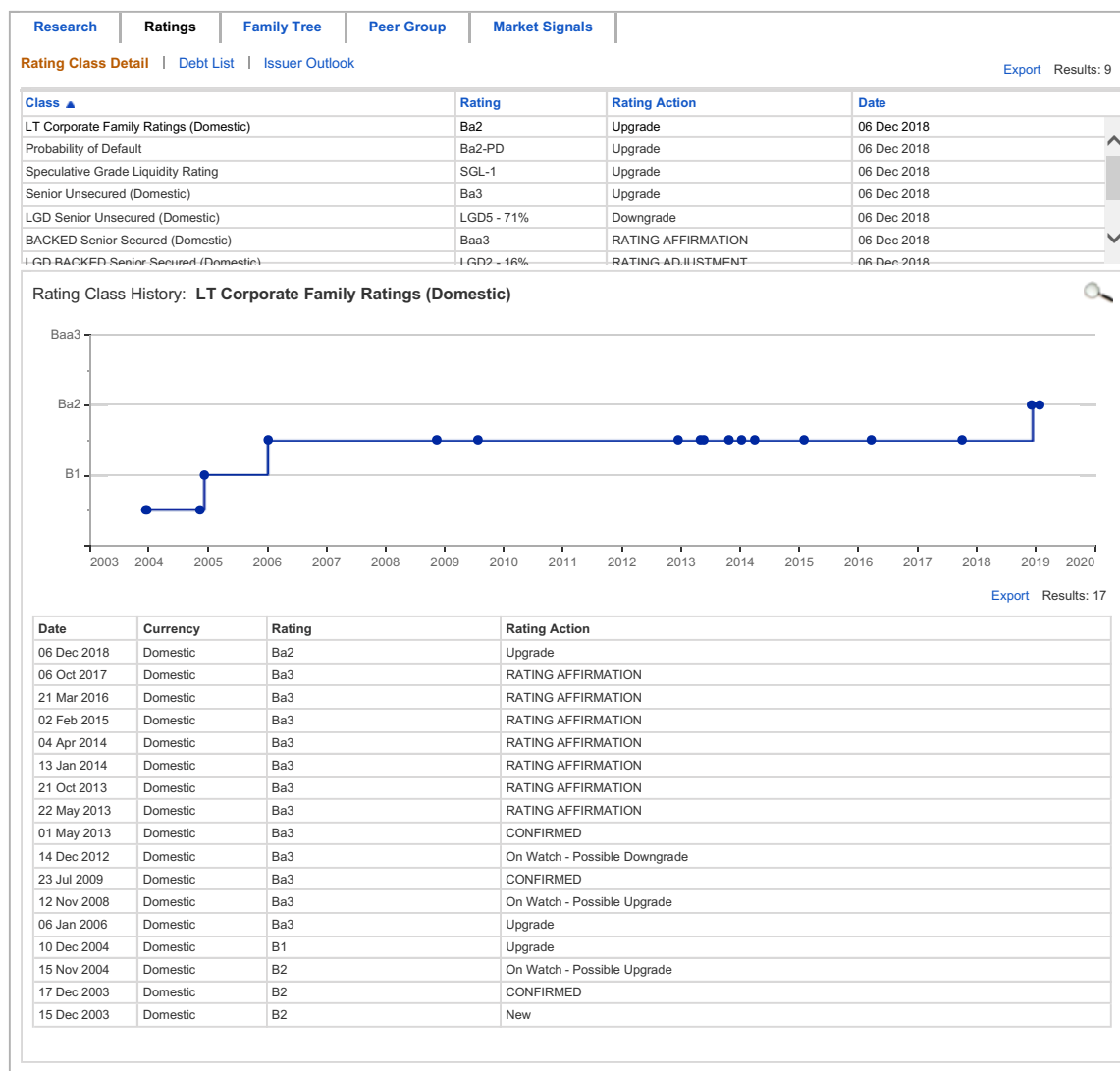
Rating: **SGL-1**, Not on Watch
Type: **Speculative Grade Liquidity Rating**
Date: **06 Dec 2018**

OUTLOOK

Positive
Date: **06 Dec 2018**

OTHER DEBTS ON WATCH?

No



For credit ratings that are derived exclusively from an existing credit rating of a program, series, category/class of debt, support provider or primary rated entity, or that replace a previously assigned provisional rating at the same rating level, Moody's publishes a rating announcement on that series, category/class of debt or program as a whole, on the support provider or primary rated entity, or on the provisional rating, but often does not publish a specific rating announcement on each subsequent bond or note for which the credit rating is derived from the existing credit rating. Rating announcements are usually press releases classified as Rating Actions on www.moody's.com. Please refer to the Research tab on the issuer/entity page for the rating announcement.

TEGRITY HOTLINE

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rdys.ethicspoint.com

IE FROM THE UNITED STATES:
330-MDYS (1-866-330-6397)

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SIGNIFICANT CRITERIA AND MODEL ERRORS

NRG Energy Inc.

Issuer Credit Rating					
Rating Type	Rating	Rating Date	Regulatory Identifiers	CreditWatch/ Outlook	CreditWatch/ Outlook Date
Local Currency LT	BB Regulatory Disclosures	10-Sep-2018	EE	Stable	10-Sep-2018
Foreign Currency LT	BB Regulatory Disclosures	10-Sep-2018	EE	Stable	10-Sep-2018

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EXHIBIT C-6.1

NRG Retail Northeast
3711 Market Street, Suite 1000
Philadelphia, PA 19104

January 31, 2019

Re: NRG Energy, Inc.'s Guarantee of the Obligations of Energy Plus Holdings LLC

To Whom It May Concern:

Energy Plus Holdings LLC ("Energy Plus") is a wholly owned subsidiary of NRG Energy, Inc.
I certify that NRG Energy, Inc. guarantees the obligations of Energy Plus.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mike Starck", written over a horizontal line.

Mike Starck
Vice President

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.

Response:

N/A - Please see **Exhibit C-6.1.**

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.

Response:

The predecessor of the current NRG was formed in 1989 as the non-utility subsidiary of Northern States Power Company. While owned by NSP and later by Xcel Energy, Inc. NRG pursued an aggressive high-growth strategy focused on power plant acquisition, high leverage and aggressive development, including site development and turbine orders. NRG and a number of its subsidiaries undertook a comprehensive reorganization and restructuring under chapter 11 of the United States Bankruptcy Code. As part of the reorganization, Xcel Energy relinquished its ownership interest in NRG, and NRG became an independent public company. NRG emerged from bankruptcy on December 5, 2003.

On April 1, 2014, Energy Plus Holdings LLC’s parent, NRG Energy, Inc. acquired substantially all of the assets of Edison Mission Energy, which included all of Edison Mission Energy’s direct and indirect subsidiaries. Prior to the acquisition, Edison Mission Energy and certain of its subsidiaries filed voluntary petitions for bankruptcy. Edison Mission Energy and the debtor subsidiaries emerged from bankruptcy upon completion of the acquisition by NRG.

On June 14, 2017, GenOn, then a subsidiary of Energy Plus Holding LLC’s ultimate parent company, NRG Energy, Inc., and certain of GenOn’s subsidiaries (collectively, “GenOn”) filed for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (Houston Division) to restructure GenOn’s balance sheet through a prearranged plan of reorganization. On December 14, 2018, GenOn’s plan of reorganization became effective. Pursuant to that plan, NRG no longer owns GenOn or any of GenOn’s subsidiaries.

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.

Response:

On September 30, 2011, Energy Plus Holdings LLC and its subsidiaries were acquired by NRG Energy, Inc.

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.

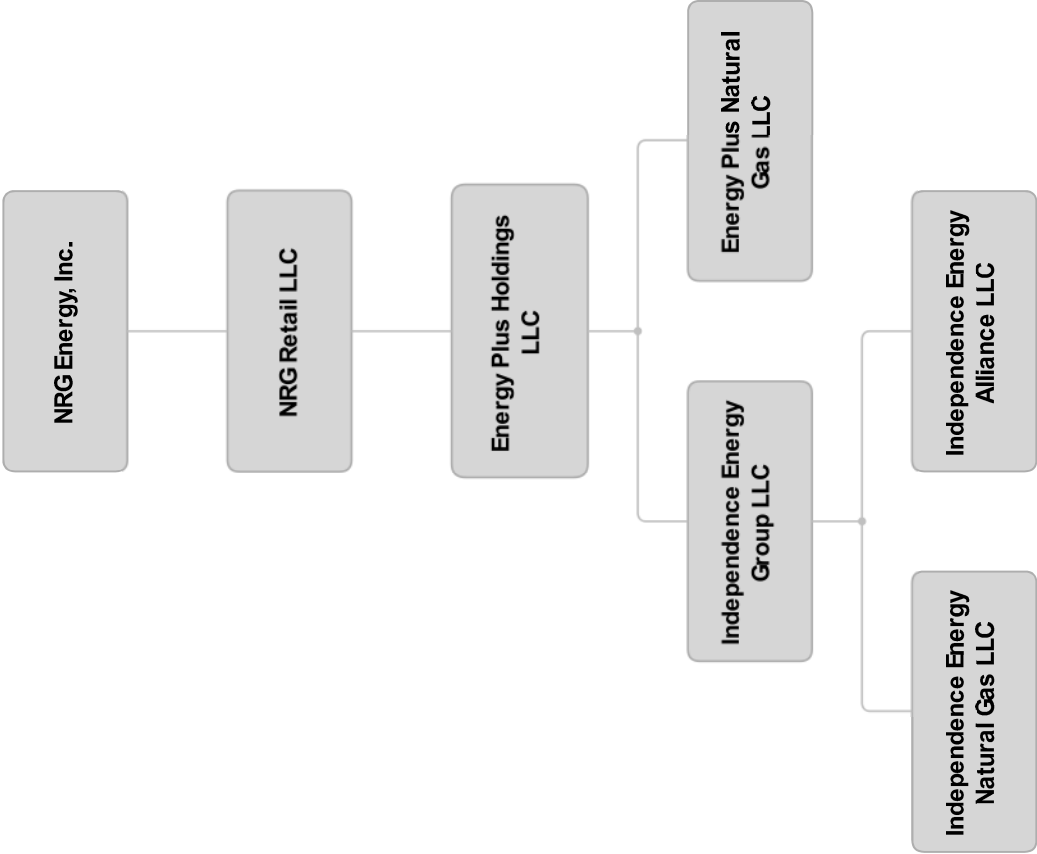


Exhibit D-1 “Operations” provide a written description of the operational nature of the applicant’s business. Please include whether the applicant’s operations include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.

Response:

Energy Plus partners with Energy Services Group (“ESG”) to provide EDI and CIS 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).

Energy Plus 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.

Energy Plus has an in-house 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. The customer service call center is located at the company's headquarters.

Exhibit D-2 “Operations Expertise,” given the operational nature of the applicant’s business, provide evidence of the applicant’s experience and technical expertise in performing such operations.

Response:

Energy Plus 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 New York, Connecticut, Massachusetts, Illinois, Pennsylvania, New Jersey, Maryland, and Ohio, Energy Plus 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 business partners described in Exhibit D-1 to successfully develop and implement the infrastructure, systems, and processes to reliably provide service to Ohio consumers. As described in the details provided in Exhibit D-3, Energy Plus intends to also leverage key internal staff.

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.

Response:

Key Operating Personnel:

Mike Starck, General Manager & VP, NRG Retail

3711 Market St. Suite 1000 Philadelphia, PA 19104

Phone: 267.295.5535

Mike.Starck@nrg.com

Mr. Starck is the General Manager of the NRG Retail East Region at NRG Energy. His primary responsibilities serving the NRG Retail business include advancing the growth of the brand as a market leader and managing sales and financial objectives in the Northeast Retail region, including operations in various states and service areas for both electricity and natural gas. Mr. Starck works with the NRG Retail team to bring innovative products to market for our residential customers while working to grow in both brand recognition and customer satisfaction. He has years of experience in the retail energy industry in various roles including IT, Daily Operations and Customer Service while helping establish market presence and business operations across numerous utility markets.

Joe Holtman, Managing Director of Wholesale Supply Operations

3711 Market St. Suite 1000 Philadelphia, PA 19104

Phone: 1.267.295.5409

Joe.Holtman@nrg.com

Joe Holtman joined Energy Plus Holdings LLC, an NRG subsidiary, in 2010 and brings extensive industry experience in his role as the Managing Director of Wholesale Supply Operations for all of the NRG Retail affiliates. He is responsible for scheduling electricity purchases in PJM, NYISO and ISO-NE and natural gas purchases in 15 gas utilities across OH, PA, MD, NJ and NY; hedging electricity and natural gas supply purchases to mitigate market cost volatility; and meeting renewable portfolio standards and voluntary green power program requirements in OH and the other states in which the NRG Retail Affiliates, including Energy Plus Holdings LLC, operate. Prior to joining the NRG Retail family of companies, Mr. Holtman spent two years at Liberty Power as the Vice President of Wholesale Supply Operations. In his role at Liberty Power, he led the installation of a state-of-the-art risk management system and developed and implemented the necessary risk controls to ensure the company’s strong financial success.

In addition, Mr. Holtman was responsible for Liberty's energy procurement program across five major markets, utilizing physical and financial hedges to protect fixed-price retail sales margins. Prior to his tenure at Liberty Power, Mr. Holtman spent six years at the Consolidated Edison Company of New York where he served as the Director of Electricity Supply. At Con Ed, he was responsible for the purchase of \$3 billion of electricity supply annually, including financial hedging and accounting for four regulated utilities operating in three states. Earlier in his career, he spent fifteen years at Orange and Rockland Utilities where he was responsible for the purchase of \$220 million of electricity and natural gas

annually. He also performed electric and gas capacity and energy planning and procurement, supply contracting, accounting, regulatory affairs and risk management.

Brian Grant, Director, East Retail IT

3711 Market St. Suite 1000 Philadelphia, PA 19104

Phone: 1.267.295.0625

Brian.C.Grant@nrg.com

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.

Jordon McConnell, Director, Sales Strategy

3711 Market St. Suite 1000 Philadelphia, PA 19104

Phone: 1.267.295.0625

Jordon.McConnell@nrg.com

Jordon McConnell leads sales strategy 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.

Tom Hughes, Director, Retail Marketing & Branding

3711 Market St. Suite 1000 Philadelphia, PA 19104

Phone: 1.267.295.5867

tom.hughes@nrg.com

Tom Hughes serves as the head of retail marketing for the NRG retail business in Texas and the Northeast. Tom joined NRG in 2010 and previously served as Executive Director for the NRG Retail Charitable Foundation and led the company's community marketing and sponsorship & events efforts. Prior to NRG, Tom spent 15 years in a variety of leadership roles in Sales, IT, Marketing, Advertising and Branding at AT&T. Tom holds a MBA from Webster University in St. Louis and a BS from Truman State University.

Exhibit D-4 “FERC Power Marketer License Number,” provide a statement disclosing the applicant’s FERC Power Marketer License number. (Power Marketers only)

Response:

Energy Plus Holdings LLC obtained FERC Market Based Rate authority on May 26, 2010 under Docket Nos. ER10-842-000, and ER10-842-001.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 11-0625-EL-CRS

Summary: Application for Renewal for Retail Generation Providers and Power Marketers electronically filed by Mrs. Gretchen L. Petrucci on behalf of Energy Plus Holdings LLC