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FILE Via FedEx
April 26, 2019

Public Utilities Commission of Ohio
Docketing Division
13th Floor
180 Broad Street
Columbus, Ohio 43215-3793

**Re: Renewal Application for Electricity Ratings, LLC Electric Broker License
(17-1235-EL-AGG)**

Docketing Division:

In regards to the above referenced matter, enclosed please find one original and three confidential copies of Electricity Ratings, LLC's Competitive Retail Electric Broker renewal application, together with one redacted copy of the same.

We are asking for the following exhibits to be filed under seal:¹

1. C-3: Financial Statements
2. C-4: Financial Arrangements
3. C-5: Forecasted Financial Statements

Please do not hesitate to contact me at (718) 690-3480 or by email at michellemann@feller.law if you should have any questions regarding this matter.

Respectfully,

A handwritten signature in cursive script that reads 'Michelle Mann'.

Michelle Mann
Director of Government Affairs and
Regulatory Compliance
Feller Law Group, PLLC
159 20th St, Suite 1B
Brooklyn, NY 11232
On behalf of Electricity Ratings, LLC

Enclosures

¹ As per 4901:1-27-08 of the Ohio Administrative Code

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Public Utilities Commission

Original AGG Case Number	Version
17 - 1235 -EL-AGG	May 2016

RENEWAL APPLICATION FOR ELECTRIC AGGREGATORS/POWER BROKERS

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 certified as: (check all that apply)



Power Broker



Aggregator

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

Legal Name Electricity Ratings, LLC

Address 1502 Sawyer St., Ste 130 Houston, TX 77007

PUCO Certificate # and Date Certified 17-1234E (1); June 16, 2017

Telephone # (713) 828-9096 Web site address (if any) www.TexasElectricityRatings.com

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

Legal Name Electricity Ratings, LLC

Address 1502 Sawyer St., Ste 130 Houston, TX 77007

Telephone # (713) 828-9096 Web site address (if any) www.TexasElectricityRatings.com

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

Electricity Ratings, LLC

A-5 Contact person for regulatory or emergency matters

Name Matt Oberle

Title Managing Member

Business address 1502 Sawyer St., Ste 130 Houston, TX 77007

Telephone # (866) 303-9147

Fax # _____

E-mail address moberle@texaselectricityratings.cc

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

Name Matt Oberle
Title Managing Member
Business address 1502 Sawyer St., Ste 130 Houston, TX 77007
Telephone # (866) 303-9147 Fax # _____
E-mail address moberle@texaselectricityratings.c

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

Customer Service address 1502 Sawyer St., Ste 130 Houston, TX 77007
Toll-free Telephone # (866) 303-9147 Fax # _____
E-mail address moberle@texaselectricityratings.c

A-8 Applicant's federal employer identification number # 271446702

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.

See Attachment A-10

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 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 including aggregation 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 including aggregation 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.



Signature of Applicant & Title

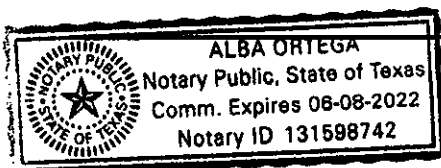
Sworn and subscribed before me this 18 day of April, 2019
 Month Year



Signature of official administering oath

Alba Ortega / Notary
 Print Name and Title

My commission expires on 06-08-2027



AFFIDAVIT

State of Texas :

____ ss.
(Town)

County of Harris :

Matt Oberle

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

He/She is the Managing Member (Office of Affiant) of Electricity Ratings, 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 fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
7. 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.
8. 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.
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.

MA All Manager
Signature of Affiant & Title

Sworn and subscribed before me this 18 day of April, 2019
Month Year

[Signature]
Signature of official administering oath

Alba Ortega / Notary
Print Name and Title

My commission expires on 06-08-2022

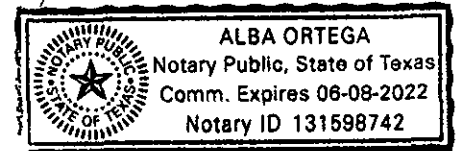


Exhibit A-10
"Principal Officers, Directors
& Partners"

Electricity Ratings, LLC
Principle Officers, Directors and Partners

Matt Oberle
Managing Member
1502 Sawyer St., Ste 130 Houston, TX 77007
713-828-9096

Karl Trollinger
CEO
1502 Sawyer St., Ste 130 Houston, TX 77007
713-594-7819

Exhibit B-1

"Jurisdictions of Operation"

Electricity Ratings, LLC Provides services in California, Connecticut, Georgia, Texas, Illinois, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Washington D.C.

As of the date of this renewal application, Electricity Ratings, LLC confirms that it is not licensed, certified, registered or otherwise authorized to provide retail or wholesale electric services or aggregation services in any jurisdiction, apart from what is listed above.

Exhibit B-2
"Experience & Plans"

Electricity Ratings, LL (the "Company") is an energy brokerage company, established in 2009, that organizes and presents offers from retail energy suppliers to customers. Customers may then select to purchase electricity or natural gas directly from the retail energy supplier.

The Company is not an electricity or natural gas supplier and will not be purchasing, or taking title to, the commodity. Further, the Company does not provide billing statements. The responsibilities addressed in Chapter 4901:1-24 of the Ohio Administrative Code, Chapter 4901:1-21 of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code concerning the billing of consumers and customer inquiries and complaints are met by the licensed retail energy supplier.

The Company does not charge a separate fee to the consumer for its services. As in real estate, the broker fee or commission is included in the price quoted and paid by the seller - the energy provider - after the transaction is complete

The Company's mission is to provide a platform that gives a voice to consumers and enables them to be their own consumer advocates while helping them reduce their energy bills. Consumers could be confused by the deregulated electricity market, and the Company help's them better understand their choices, which could lead to lower electricity or natural gas bills. Additionally, the Company provides opportunities for retail suppliers to respond to complaints and provide customer service, further engaging customers and helping them understand the deregulated energy space.

Exhibit B-3

"Disclosure of Liabilities and Investigations"

Applicant does not have any 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 it is seeking to be certified to provide.

Exhibit C-1 "Annual Reports"

Applicant does not have annual reports because it is not a publicly traded company.

Exhibit C-2

"SEC Filings"

Applicant does not file 10K/8K filings with SEC as Electricity Ratings is not a publicly traded company, it is not required to file such documents with SEC.

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Exhibit C-3
“Financial Statements”

Exhibit C-3 "Financial Statements" will be filed under seal.

Exhibit C-4

"Financial Arrangements"

N/A- Applicant is seeking to be certified as a broker.

CONFIDENTIAL

Exhibit C-5
“Forecasted Financial Statements”

Exhibit C-5 "Forecasted Financial Statements" will be filed under seal.

Exhibit C-6
"Credit Rating"

N/A, Electricity Ratings does not have a credit rating.

Exhibit C-7
“Credit Report”

Electricity Ratings, Llc

DUNS: 02-749-7901

CS CreditSignal

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Summary ●

Company Info

[Update Company Info ▶](#)

1502 Sawyer Ste 130
Houston, TX 77007
Phone: (713) 828-9096
URL:

DBA's :
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Scores and Ratings

Score / Rating:	Change	Last Date Changed
PAYDEX®	Improved ▲	04/18/2017
Delinquency Predictor Class	No Change ↔	01/08/2019
Financial Stress Class	No Change ↔	08/07/2018
Supplier Evaluation Rating	Improved ▲	12/17/2018
D&B Rating	No Change ↔	05/11/2017
D&B Viability Rating	Good (Status)	

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Exhibit C-8

"Bankruptcy Information"

None of the Applicant, its owner or officers have a history of any reorganizations, protection from creditors, or any other form of bankruptcy. Applicant does not have 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.

Exhibit C-9

"Merger information"

Applicant does not have a history of dissolution or merger or acquisition.

Exhibit C-10

"Corporate Structure"

Electricity Ratings, LLC is wholly owned by Matt Oberle. It is a stand alone company with no affiliate or subsidiary companies.