



Original CRS Case Number	Version
13 - 1453 -EL-CRS	May 2016

RENEWAL APPLICATION FOR RETAIL GENERATION PROVIDERS AND POWER MARKETERS

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

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

A. RENEWAL INFORMATION

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

- Checkboxes for Retail Generation Provider, Power Broker, Power Marketer, and Aggregator.

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

Legal Name XOOM Energy Ohio, LLC
Address 3711 Market St. Suite 1000, Philadelphia, PA 19104
PUCO Certificate # and Date Certified #13-716E 7/22/13
Telephone #(704) 247-1450 Web site address (if any) www.xoomenergy.com

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

Legal Name XOOM Energy Ohio, LLC
Address 3711 Market St. Suite 1000, Philadelphia, PA 19104
Telephone #(888) 997-8979 Web site address (if any) www.xoomenergy.com

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

XOOM Energy Ohio, LLC _____

A-5 Contact person for regulatory or emergency matters

Name Lindsay Cervenak
Title Regulatory Compliance Manager
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 Patricia Kulesa
Title Compliance Manager
Business address 11208 Statesville Rd. Suite 200, Huntersville, NC 28078
Telephone # (704) 274-3000 Fax # _____
E-mail address consumeraffairs@xoomenergy.co

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

Customer Service address 11208 Statesville Rd. Suite 200, Huntersville, NC 28078
Toll-free Telephone # (888) 997-8979 Fax # _____
E-mail address customercare@xoomenergy.com

A-8 Applicant's federal employer identification number # 45-1285939

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)

Mia Stone Vice President
Signature of Applicant and Title

Sworn and subscribed before me this 20th day of June, 2019
Month Year

Lindsay Cervenak
Signature of official administering oath

Lindsay Cervenak, Notary Public
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

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COMMONWEALTH OF PENNSYLVANIA

AFFIDAVIT

State of Pennsylvania :

Philadelphia ss.
(Town)

County of Philadelphia :

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

He/She is the Vice (Office of Affiant) of XCOM Energy Ohio (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.

Lindsay Marie Cervenak
Signature of Affiant & Title

Sworn and subscribed before me this 20th day of June, 2019 Year
Month

Lindsay Marie Cervenak
Signature of official administering oath

Lindsay Cervenak, Notary Public
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.

Response:

Name	Title	Address	Telephone
Elizabeth Killinger	President	910 Louisiana St 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 St Houston, TX 77002	609-524-4500
Edward Krupa	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, TX 78701	609-524-4500
Gaetan Frotte	Treasurer	804 Carnegie Center Princeton, NJ 08540	609-524-4500
Mark Parsons	Vice President	910 Louisiana St Houston, TX 77002	609-524-4500
Deborah 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

State	Energy Plus Holdings LLC 3711 Market Street, Suite 1000 Philadelphia, PA 19104	Independence Energy Group LLC d/b/a Cirro 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
CA						No licensing requirement			
CT	Electric: Docket 09-01-21	Electric: Docket 11-11-04		Electric: Docket 11-05-20	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. 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: GM-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: Docket # 2012-00596			
MD	Electric: IR-1805		Natural Gas: IR-2216	Electric: IR-2058 Natural Gas: IR-3480	Electric: IR-2790 & IR-2345 Natural Gas: IR-3752	Electric: IR-2445 Natural Gas: IR-2446			
MA	Electric: CS-072			Electric: CS-081 Natural Gas: RA-154	Electric: CS-083	Electric: CS-088 Natural Gas: GS-RA-07			
MI						Natural Gas: U-16802			
NH				Electric: DM 15-287		Electric: DM 13-185			
NJ	Electric: ESL-0087	Electric: ESL-0100	Natural Gas: GSL-0100	Electric: ESL-0093 Natural Gas: GSL-0176	Electric: ESL-0098	Electric: ESL-0115 Natural Gas: GSL-0112			
NY	Electric: Licensed - no license # given ESCO eligibility letter dated 8/8/07	Electric: Licensed - no license # given ESCO eligibility letter dated 5/3/11	Natural Gas: Licensed - no license # given (ESCO Code EPGS) GSCO eligibility letter dated 7/31/08	Licensed - no license # given (ESCO Code RELI) ESCO eligibility letter dated 8/26/11 NGSCO eligibility letter dated 2/17/15	Electric & Natural Gas: Licensed - no license # given ESCO eligibility letters dated 4/8/2009 and 8/3/2011	Electric & Natural Gas: Licensed - no license # given ESCO Code: XOOM ESCO/NGSCO eligibility letter dated: 5/21/12			
OH	Electric:11-341E	Electric: 12-552E	Natural Gas: 11-222G	Electric: 11-401E Natural Gas: 17-591G	Electric: 18-0483E	Electric: 13-716E 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-2012-2283821 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: ER-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.

Response:

XOOM Energy Ohio, LLC ("XOOM") utilizes network marketing to reach potential customers and utilizes utility consolidated billing to provide billing statements to customers. XOOM 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 XOOM 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, California, Connecticut, Washington D.C., Delaware, Georgia, Indiana, Kentucky, Maine, Michigan, New Hampshire, Rhode Island, Virginia, Alberta, Ontario New Jersey, Pennsylvania, Maryland, Illinois, Ohio, and Massachusetts.

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

- Call center management has the necessary skills and qualifications that meet XOOM's 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.
- XOOM 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.
- XOOM has made the Anti-Discrimination Rules easily accessible by the company's employees on a regular basis.
- XOOM has made customers aware of the process to file a complaint with XOOM 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:

XOOM Energy Ohio, LLC does not have any existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigations, or any other matter that could adversely impact the XOOM Energy Ohio LLC's financial or operational status or ability to provide the services it is seeking to be certified to provide.

Exhibit C-1 “Annual Reports,” 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:

XOOM Energy Ohio, 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:

XOOM Energy Ohio, 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:

XOOM Energy Ohio, 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.



139 East Fourth
EX396
Cincinnati, Ohio 45202

June 17, 2019

Xoom Energy Ohio, LLC, has met the Electric Collateral obligations for Duke Energy Corporation as of June 17, 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:

XOOM Energy Ohio, LLC 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 guaranteeing the obligations of XOOM Energy Ohio, LLC as **Exhibit C-6.1**.

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

TRENDING RESEARCH RATINGS TOOLS & DATA EVENTS & TRAINING

Linds

NRG Energy, Inc.

Ticker: **NRG** Moody's Org ID: **806927478** LEI: **5E2UPK5SW04M13XY7I38** Market Segment: **Corporates**
 Industry: **ENERGY: UNREG - ELECTR 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

Research | Ratings | Family Tree | Peer Group | Market Signals
Export Results: 11

Rating Class Detail | Debt List | Issuer Outlook

Class	Rating	Rating Action	Date
LT Corporate Family Ratings (Domestic)	Ba2	Upgrade	06 Dec 2018
Probability of Default	Ba2-PD	Upgrade	06 Dec 2018
Speculative Grade Liquidity Rating	SGL-1	Upgrade	06 Dec 2018
Senior Unsecured (Domestic)	Ba3	Upgrade	06 Dec 2018
LGD Senior Unsecured (Domestic)	LGD5 - 71%	Downgrade	06 Dec 2018
Senior Secured (Domestic)	Baa3	New	16 May 2019
PACKED Senior Secured (Domestic)	Baa3	RATING AFFIRMATION	06 Dec 2018

Rating Class History: LT Corporate Family Ratings (Domestic)

Date	Currency	Rating	Rating Action
06 Dec 2018	Domestic	Ba2	Upgrade
06 Oct 2017	Domestic	Ba3	RATING AFFIRMATION
21 Mar 2016	Domestic	Ba3	RATING AFFIRMATION
02 Feb 2015	Domestic	Ba3	RATING AFFIRMATION
04 Apr 2014	Domestic	Ba3	RATING AFFIRMATION
13 Jan 2014	Domestic	Ba3	RATING AFFIRMATION
21 Oct 2013	Domestic	Ba3	RATING AFFIRMATION
22 May 2013	Domestic	Ba3	RATING AFFIRMATION
01 May 2013	Domestic	Ba3	CONFIRMED
14 Dec 2012	Domestic	Ba3	On Watch - Possible Downgrade
23 Jul 2009	Domestic	Ba3	CONFIRMED
12 Nov 2008	Domestic	Ba3	On Watch - Possible Upgrade
06 Jan 2006	Domestic	Ba3	Upgrade
10 Dec 2004	Domestic	B1	Upgrade
15 Nov 2004	Domestic	B2	On Watch - Possible Upgrade
17 Dec 2003	Domestic	B2	CONFIRMED
15 Dec 2003	Domestic	B2	New

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.

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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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- [NRG Energy Inc.'s Proposed \\$600 Million Senior Secured First-Lien Notes Due 2024 Rated 'BBB-' \(Recovery Rating: '1'\)](#)
15-May-2019 18:06 EDT

NEW YORK (S&P Global Ratings) May 15, 2019--S&P Global Ratings today assigned its 'BBB-' issue-level rating and '1' recovery rating to NRG Energy Inc.'s proposed \$600 million senior secured first-lien notes due 2024. The '1' recovery rating indicates...
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PREMIUM RESEARCH FROM RATINGSDIRECT

The following premium research is available from RatingsDirect - S&P Global Ratings' real-time, Web-based source for credit ratings, research, and risk analysis.

[Credit Trends: Global Rising Stars Since 1995 Total 853](#)
05-Jun-2019 12:08 EDT

This research is a companion piece to our series on



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

June 18, 2019

Re: NRG Energy, Inc.'s Guarantee of the Obligations of XOOM Energy Ohio, LLC

To Whom It May Concern:

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

Respectfully submitted,

A handwritten signature in black ink that reads "Mike Starck". The signature is written in a cursive style and is positioned above 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, XOOM Energy Ohio, 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 XOOM Energy Ohio 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:

June 1, 2018, NRG Retail LLC acquired 100% of the membership interest in XOOM Energy Global Holdings, LLC (“Global Holdings”). Global Holdings holds 100% membership interest in XOOM Energy, LLC which holds 100% membership interest in XOOM Energy Ohio, LLC

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:

XOOM Energy Ohio, LLC (“XOOM”) 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).

XOOM 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.

XOOM 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.

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:

XOOM Energy Ohio, LLC (“XOOM”) 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, California, Connecticut, Washington D.C., Delaware, Georgia, Indiana, Kentucky, Maine, Michigan, New Hampshire, Rhode Island, Virginia, Alberta, Ontario New Jersey, Pennsylvania, Maryland, Illinois, Ohio, and Massachusetts, XOOM 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, XOOM 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, VP Trading

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 XOOM Energy Ohio, 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.

Mark Keehne, Director, Retail IT

11208 Statesville Road, Suite 200, Huntersville, NC 28078

Phone: 1.704.274.3416

mkeehne@xoomenergy.com

Mark Keehne is responsible for IT support for the XOOM Energy brand, including application development and support for the XOOM Energy brand, as well as local IT infrastructure support for the XOOM brand locations in NC. Mark's team supports new development projects and enhancements, as well as day-to-day support for ongoing business operations for customer and channel partner transactions. Mark's background spans multiple IT disciplines. He has worked in the energy, retail, and aerospace industries, is a US Navy veteran, and has a BS degree from The Citadel.

Jordon McConnell, Senior 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.

Jackie Whitman, Director, Marketing

11208 Statesville Road, Suite 200, Huntersville, NC 28078

Phone: 1.704.274.1450

JackieWhitman@nrg.com

Jackie Whitman leads the marketing and sales strategy for NRG's retail business for the XOOM Energy brand in North America. Over the course of her career, Ms. Whitman has gained experience in a broad range of business functions including marketing, sales, product development, eCommerce and business development. Jackie has worked in a number of industries including energy, telecommunications and commercial construction. Jackie holds an MBA from the Queens University and a BA from the University of North Carolina at Chapel Hill.

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

Response:

XOOM Energy, LLC is authorized by FERC under Docket No. ER 11-3418-000

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 13-1453-EL-CRS

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