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PUCO

October 2, 2019

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus OH 43215-3793

Dear Docketing Division:

Please accept the enclosed Natural Gas Broker application. It is our wish that you will find our application to be complete and in conformance with PUCO requirements.

Accordingly, enclosed please find:

- One original Competitive Retail Natural Gas Broker application, signed and notarized, with financial pages
- An affidavit requesting confidential treatment of applicable financial information, signed and notarized
- Three copies of Competitive Retail Natural Gas Broker application with financial pages
- Three copies of Competitive Retail Natural Gas Broker application with redacted financial pages

If you have any questions, please do not hesitate to contact me via any of the following:

Office Phone: 540-351-0981
Mobile Phone: 540-878-1745
Email: mstumpo@legacyenergy.com

Thank you in advance for your assistance in this matter.

Very Best Regards,

For THE LEGACY ENERGY GROUP, LLC

A handwritten signature in black ink that reads 'Mike Stumpo'.
Mike Stumpo

This is to certify that the above is an accurate and complete reproduction of the document delivered in the regular course of business.
Technician DR Date Processed 10/4/19

58 Winchester Street | Warrenton, VA 20186

888.351.0981

www.legacyenergy.com

AFFIDAVIT

State of Virginia :
 : Warrenton SS:
County of Fauquier :

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

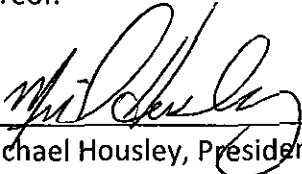
He is the President of The Legacy Energy Group, LLC, the applicant;

That He 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 that it will comply with all Public Utilities Commission of Ohio rules or orders as adopted pursuant to Chapter 4928 of the Revised Code.
3. 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.
4. The information contained in pages 22 thru 27 and page 29 of the application are confidential. Those are seven pages of financial information, including Statements of Assets, Liabilities, and Shareholder Equity – Income Tax Basis that lists the current cash balances and recent activity of payment trends. None of the information contained in these exhibits is readily available outside of the Company. The only individuals at the company who have access to this information are Company President Michael Housley, Senior Vice President Delbert Roberts, Vice President Thomas Ihrig, Director, Christine Bennett and Energy Management Services Manager Michael Stumpo. This information is password protected on the company's computers and any hard copies are locked in a filing cabinet to which only Mr. Housley and Ms. Bennett possess a key. This information would reveal the structure of the company which would provide competitors insight into The Legacy Energy Group's business approach. The Company has invested considerable resources in the business model which could be reversed engineered through studying this financial information. The Company spent a certain amount of time and money in developing this information, and the only way a competitor

would acquire or duplicate this information would be if they obtained said information inappropriately. Further, public disclosure of this information will not assist the Commission in carrying out its duties under the pertinent rules and regulations.

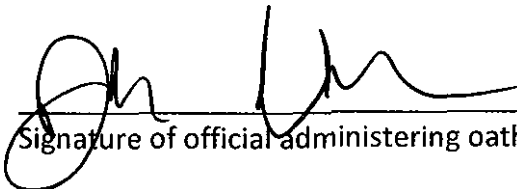
That the facts set forth are true and correct to the best of his/her knowledge, information, and belief and that he/she expects said Applicant to be able to prove the same at any hearing hereof.



Michael Housley, President
58 Winchester Street
Warrenton, Virginia 20186

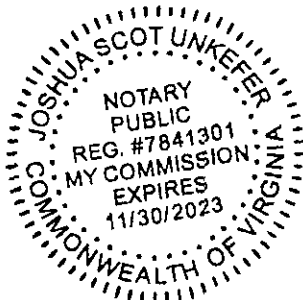
Sworn and subscribed before me this 1st day of October ~~September~~ 2019.

Michael Housley, President
Name and Title



Signature of official administering oath

My commission expires on 11/30/2023



**NON-REDACTED
ORIGINAL**



PUCO USE ONLY – Version 1.08 May 2016		
Date Received	Case Number	Certification Number
	- GA-AGG	

**INITIAL CERTIFICATION APPLICATION
COMPETITIVE RETAIL NATURAL GAS BROKERS /AGGREGATORS**

Please **type or print** all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit A-15 - Company History*). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus, Ohio 43215-3793.

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

SECTION A - APPLICANT INFORMATION AND SERVICES

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

☐ Retail Natural Gas Aggregator ☒ Retail Natural Gas Broker

A-2 Applicant information:

Legal Name The Legacy Energy Group, LLC
Address 58 Winchester Street, Warrenton VA 20186
Telephone No. 540-351-0981 Web site Address www.legacyenergy.com

A-3 Applicant information under which applicant will do business in Ohio:

Name The Legacy Energy Group, LLC
Address 58 Winchester Street, Warrenton VA 20186
Web site Address www.legacyenergy.com Telephone No. 540-351-0981

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

Legacy
Legacy Energy
The Legacy Energy Group, LLC

A-5 Contact person for regulatory or emergency matters:

Name Mike Stumpo Title Energy Mgmt. Services
Business Address 58 Winchester Street, Warrenton VA 20186
Telephone No. 540-351-0981 x180 Fax No. Email Address mstumpo@legacyenergy.com

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

Name Michael Housley Title President
Business address 58 Winchester Street, Warrenton VA 20186
Telephone No. 540-351-0981 x120 Fax No. Email Address mhousley@legacyenergy.com

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

Customer service address 58 Winchester Street, Warrenton VA 20186
Toll-Free Telephone No. 800-351-0981 Fax No. Email Address info@legacyenergy.com

A-8 Provide "Proof of an Ohio Office and Employee," in accordance with Section 4929.22 of the Ohio Revised Code, by listing name, Ohio office address, telephone number, and Web site address of the designated Ohio Employee

Name National Registered Agents, Inc. Title Commercial Registered Agent
Business address 4400 Easton Commons Way, Suite 125, Columbus OH 43219
Telephone No. 888-579-0286 Fax No. 516-222-2116 Email Address CT-Statecommunications@woltersklu

A-9 Applicant's federal employer identification number 54-1947808

A-10 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 |

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

<input checked="" type="checkbox"/> Columbia Gas of Ohio	<input type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Dominion East Ohio	<input type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Duke Energy Ohio	<input type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Vectren Energy Delivery of Ohio	<input type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial

A-12 If applicant or an affiliated interest previously participated in any of Ohio's Natural Gas Choice Programs, for each service area and customer class, provide approximate start date(s) and/or end date(s) that the applicant began delivering and/or ended services.

☒ **Columbia Gas of Ohio**

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service 11-1-08	End Date
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service 11-1-08	End Date
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service 11-1-08	End Date

☒ **Dominion East Ohio**

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input checked="" type="checkbox"/> Small Commercial	Beginning Date of Service 04-01-18	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service	End Date
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service 04-01-17	End Date

☒ **Duke Energy Ohio**

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input type="checkbox"/> Small Commercial	Beginning Date of Service	End Date
<input checked="" type="checkbox"/> Large Commercial	Beginning Date of Service 11-01-18	End Date
<input checked="" type="checkbox"/> Industrial	Beginning Date of Service 11-01-18	End Date

☐ **Vectren Energy Delivery of Ohio**

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input type="checkbox"/> Small Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Industrial	Beginning Date of Service	End Date

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

<input type="checkbox"/>	Columbia Gas of Ohio	Intended Start Date
<input type="checkbox"/>	Dominion East Ohio	Intended Start Date
<input type="checkbox"/>	Duke Energy Ohio	Intended Start Date
<input type="checkbox"/>	Vectren Energy Delivery of Ohio	Intended Start Date

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

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

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- B-1 Exhibit B-1 "Jurisdictions of Operation,"** provide a current list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail natural gas service, or retail/wholesale electric services.
See attached.
- B-2 Exhibit B-2 "Experience & Plans,"** provide a current description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.
See attached.
- B-3 Exhibit B-3 "Summary of Experience,"** provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking to be certified to provide (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).
See attached.
- B-4 Exhibit B-4 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational
See attached.

status or ability to provide the services it is seeking to be certified to provide.

- B-5 Exhibit B-5 "Disclosure of Consumer Protection Violations,"** disclose whether the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant has been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.

☒ No ☐ Yes

If Yes, provide a separate attachment labeled as **Exhibit B-5 "Disclosure of Consumer Protection Violations,"** detailing such violation(s) and providing all relevant documents.

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

☒ No ☐ Yes

If Yes, provide a separate attachment, labeled as **Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation,"** detailing such action(s) and providing all relevant documents.

SECTION C - APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

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

See attached.

- C-2 Exhibit C-2 "SEC Filings,"** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. 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.

See attached.

- 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).

See attached.

C-4 Exhibit C-4 “Financial Arrangements,” provide copies of the applicant's current financial arrangements to satisfy collateral requirements to conduct retail electric/gas business activity (e.g., parental or third party guarantees, contractual arrangements, credit agreements, etc.).

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

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

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

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

See attached.

C-5 Exhibit C-5 “Forecasted Financial Statements,” provide two years of forecasted income statements for the applicant's **NATURAL GAS related business activities in the state of Ohio Only**, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer. The forecasts should be in an annualized format for the two years succeeding the Application year.

See attached.

C-6 Exhibit C-6 “Credit Rating,” provide a statement disclosing the applicant's current credit rating as reported by two of the following organizations: Duff & Phelps, Fitch IBCA, Moody's Investors Service, Standard & Poor's, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or an affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant. If an applicant or its parent does not have such a credit rating, enter “N/A” in Exhibit C-6.

See attached.

C-7 Exhibit C-7 “Credit Report,” provide a copy of the applicant's current 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.

See attached.

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.

See attached.

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.

See attached.

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.

See attached.

SECTION D – APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

D-1 Exhibit D-1 "Operations," provide a current written description of the operational nature of the applicant's business functions.

See attached.

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

See attached.

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

See attached.

Applicant Signature and Title



President

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

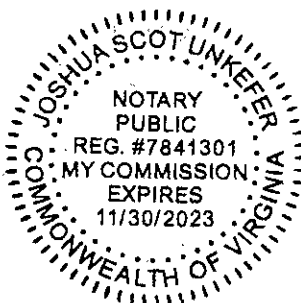


Signature of official administering oath

Michael Housley, President

Print Name and Title

My commission expires on 11/30/2023





The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service
Affidavit Form
(Version 1.07)

In the Matter of the Application of)

The Legacy Energy Group, LLC)

for a Certificate or Renewal Certificate to Provide)
Competitive Retail Natural Gas Service in Ohio.)

Case No.

 -

-GA-AGG

County of

State of

[Affiant], being duly sworn/affirmed, hereby states that:

- (1) The information provided within the certification or certification renewal application and supporting information is complete, true, and accurate to the best knowledge of affiant.
- (2) The applicant will timely file an annual report of its intrastate gross receipts and sales of hundred cubic feet of natural gas pursuant to Sections 4905.10(A), 4911.18(A), and 4929.23(B), Ohio Revised Code.
- (3) The applicant will timely pay any assessment made pursuant to Section 4905.10 or Section 4911.18(A), Ohio Revised Code.
- (4) Applicant will comply with all applicable rules and orders adopted by the Public Utilities Commission of Ohio pursuant to Title 49, Ohio Revised Code.
- (5) Applicant will cooperate with the Public Utilities Commission of Ohio and its staff in the investigation of any consumer complaint regarding any service offered or provided by the applicant.
- (6) Applicant will comply with Section 4929.21, Ohio Revised Code, regarding consent to the jurisdiction of the Ohio courts and the service of process.
- (7) Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the certification or certification renewal application within 30 days of such material change, including any change in contact person for regulatory or emergency purposes or contact person for Staff use in investigating customer complaints.
- (8) Affiant further sayeth naught.

Affiant Signature & Title

President

Sworn and subscribed before me this

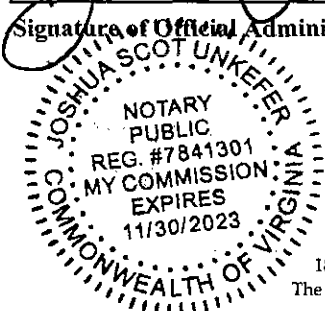
day of

Month

Year

Signature of Official Administering Oath

Print Name and Title



My commission expires on

Exhibit A-14
Principal Officers, Directors & Partners

Name:	Title:	Address/Phone:
Michael Housley	President	58 Winchester Street, Warrenton VA 20186 540-351-0981
Delbert Roberts	Senior Vice President	58 Winchester Street, Warrenton VA 20186 540-351-0981
Thomas Ihrig	Vice President	155 Harvest Lane, Frankenmuth, MI 48734 540-351-0981

Exhibit A-15 Company History

Founded in 1998, Legacy Energy's senior executive team has an average of 23 years of experience in all major areas of the energy industry, including: regulated energy markets, deregulated energy markets, demand response, electric utilities, natural gas utilities, wholesale power marketing and trading, risk management, independent power plant development, and the procurement of electricity and natural gas for retail and wholesale customers. Legacy Energy integrates this diversified skill set throughout its operations to deliver industry-leading, customized energy procurement and management solutions for each of our clients.

Legacy Energy was founded by its current president, Michael Housley. Prior to Legacy Energy, Mr. Housley was Vice President of LG&E Energy Marketing (a subsidiary of Louisville Gas and Electric Company) where he managed its coal, natural gas, power, and risk management businesses in 23 states. Delbert Roberts joined Legacy Energy in 1999 and currently serves as Senior Vice President. Prior to Legacy Energy, Mr. Roberts was the Southeastern Regional Marketing Executive for LG&E Energy Marketing for three years where he was responsible for developing contractual infrastructure and originating wholesale energy transactions in the Southeastern United States. Thomas Ihrig joined Legacy Energy in 2000 and currently serves as Vice President. Prior to Legacy Energy, Mr. Ihrig managed the gas and electric commodities for a number of nationwide clients of CMS Energy.

Legacy Energy's unwavering focus on delivering on the goals outlined in our Mission Statement dominates every aspect of our organization, and is your assurance that as a Legacy Energy client, your company will receive the finest energy management services available. With our track record of success since 1998, Legacy Energy has the proven ability and experience necessary to keep your company at the forefront of energy management optimization.

Legacy Energy's broad spectrum of clients represents every industrial, commercial and retail sector. From local private firms to global Fortune 500 multinational firms, we excel in developing and implementing client-specific energy management strategies related to energy procurement, demand reduction, risk mitigation, conservation, efficiency, and data management.

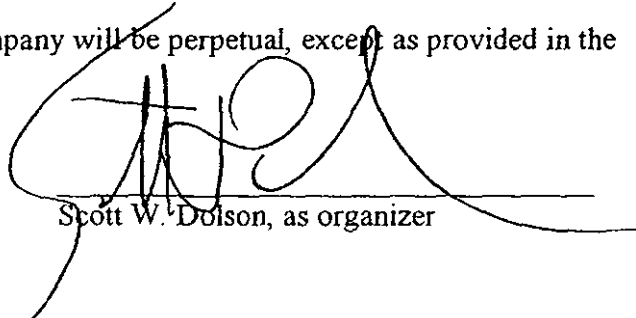
Exhibit A-16
Articles of Incorporation and Bylaws

**ARTICLES OF ORGANIZATION
FOR
THE LEGACY ENERGY GROUP, LLC**

RECEIVED & FILED
46.00
JUN 11 11 59 AM '99
JOHN Y. STODOLSKI
SECRETARY
COMMONWEALTH OF KENTUCKY

The undersigned person forms a Kentucky limited liability company pursuant to the Kentucky Limited Liability Company Act (the "Act"), KRS Chapter 275, as follows:

1. The name of the limited liability company (the "Company") shall be The Legacy Energy Group, LLC
2. The street address of the Company's initial registered office shall be 400 West Market Street, 32nd Floor, Louisville, Kentucky 40202-3363. The name of the Company's initial registered agent at that office shall be BTH Inc.
3. The mailing address of the initial principal office of the Company shall be 32 Waterloo Street, Warrenton, Virginia 20186.
4. The Company is to be managed by one or more managers. The Company shall have a Board of Directors which shall serve as the Company's "manager" as that term is contemplated in the Act. The Company's Board of Directors shall act through the Company's duly authorized officers.
5. The existence of the Company will be perpetual, except as provided in the Company's Operating Agreement.


Scott W. Dolson, as organizer

FILED IN OFFICE

14
JUN 11 1999

Bobbie Holsclaw, Clerk
By Edm D.C.

Exhibit A-17
Secretary of State

UNITED STATES OF AMERICA
STATE OF OHIO
OFFICE OF THE SECRETARY OF STATE

I, Frank LaRose, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show THE LEGACY ENERGY GROUP, LLC, a Kentucky For Profit Limited Liability Company, Registration Number 2047472, filed on September 12, 2011, is currently in FULL FORCE AND EFFECT upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 12th day of August, A.D. 2019.*

A handwritten signature in cursive script, reading "Frank LaRose".

Ohio Secretary of State

Validation Number: 201922404400

Exhibit B-1
Jurisdictions of Operation

New Hampshire
Maryland
Pennsylvania
Illinois
Maine
New Jersey
Massachusetts
Delaware
Texas
Ohio
Washington DC
Rhode Island
California
Michigan
Connecticut
New York
North Carolina
Wisconsin
Arkansas
Mississippi
Oklahoma
Virginia
Tennessee

Exhibit B-2

Experience & Plans

The Applicant has been successfully providing its clients with energy management services since 1998. During this time, Applicant has provided its clients with a combination of contractual choices, including time and material, fixed price, percentage of savings, and utility usage fee-based. Applicant will continue to utilize the aforementioned contractual options for its Ohio clients.

For time and material, fixed price and percentage of savings engagements, Applicant provides detailed billing statements. The detailed billing statements include, but are not limited to: service performed, contracted price of service, date that service was performed, payment due date, and payment remittance address. For those clients opting for utility usage fee-based remuneration, Applicant's fees are included in their electric supply contract and are remitted directly from the electric supplier to the Applicant, in which case Applicant does not provide a billing statement.

Applicant responds to customer inquiries and complaints within twenty-four hours of the initial enquiry. Said response is generally via telephone but may be via facsimile or email as formally requested by the enquirer.

Exhibit B-3 Summary of Experience

The Applicant has been successfully providing its clients with energy management services since 1998. During this time, Applicant has provided its clients with a combination of contractual choices, including time and material, fixed price, percentage of savings, and utility usage fee-based.

Applicant provides energy management services throughout the continental United States as well as in Canada. These energy management services include natural gas brokerage services in those states that have deregulated natural gas markets. Applicant provides energy management services solely to commercial and industrial customers. Applicant currently provides energy management services to approximately ninety commercial/industrial customers. Cumulative annual gas volumes under management are estimated at 9,000,000 dekatherms.

Applicant has extensive experience helping clients aggregate their natural gas load, especially for clients that 1) have facilities across a disparate geographic footprint, and 2) have a large number of small accounts at either one or more regional facilities.

Example of 1) above:

Client type: Manufacturer

Locations: NM, NC, PA, CO, NJ, TX, WA, NE, CA, OR, MS

Goal: To aggregate the natural gas load from each of the above locations that is also in a deregulated state in order to present the largest possible opportunity to potential natural gas suppliers via a formal RFP process. In these types of aggregations, Applicant does not mandate to the suppliers that they must serve either all or none of the facilities, however, the intent is to give suppliers ample opportunity to be as price competitive as possible based on the cumulative load.

Example of 2) above:

Client type: Multi-family apartment owner

Locations: 15 properties throughout NJ

Goal: To aggregate the natural gas load of all of the owner's NJ properties. The natural gas load for each standalone property does not meet minimum load requirements of most suppliers. By aggregating the load across all of the properties, Applicant was able to obtain competitive natural gas supply offers from multiple suppliers.

Exhibit B-4
Disclosure of Liabilities and Investigations

None.

**77Exhibit C-1
Annual Reports**

Not applicable. Applicant is a privately held limited liability company and does not have annual reports.

**Exhibit C-2
SEC Filings**

Not applicable. Applicant is a privately held limited liability company and is not required to file with the SEC.

Exhibit C-4
Financial Arrangements

Not applicable because applicant is applying for certification as a Retail Natural Gas Broker.
Applicant does not require a credit facility because it will not take title to any electric supply.

**Exhibit C-6
Credit Rating**

Not applicable.

Exhibit C-8
Bankruptcy Information

None.

Exhibit C-9
Merger Information

None.

**Exhibit C-10
Corporate Structure**

The applicant is a limited liability company, formed in the state of Kentucky in June 1999. The company's daily operations are managed directly by its officers:

President – Michael Housley
Senior Vice President – Delbert Roberts
Vice President – Thomas Ihrig

The company's structure is comprised of the following personnel categories:

Sales – report directly to President
Analysts – report directly to President, Senior Vice President and Vice President
Operations – report directly to Senior Vice President
Administrative – report to President and Senior Vice President

Affiliate Companies:

Affiliated Power Purchasers International, LLC (APPI)
224 Phillip Morris Drive
Suite 402
Salisbury MD 21804

APPI is an affiliate that provides natural gas broker services throughout North America.

Executive Energy Services, LLC (EES)
8404 Swan Creek Point
Fair Haven MI 48023

EES is an affiliate that provides natural gas broker services throughout North America.

The Legacy Energy Group, LLC

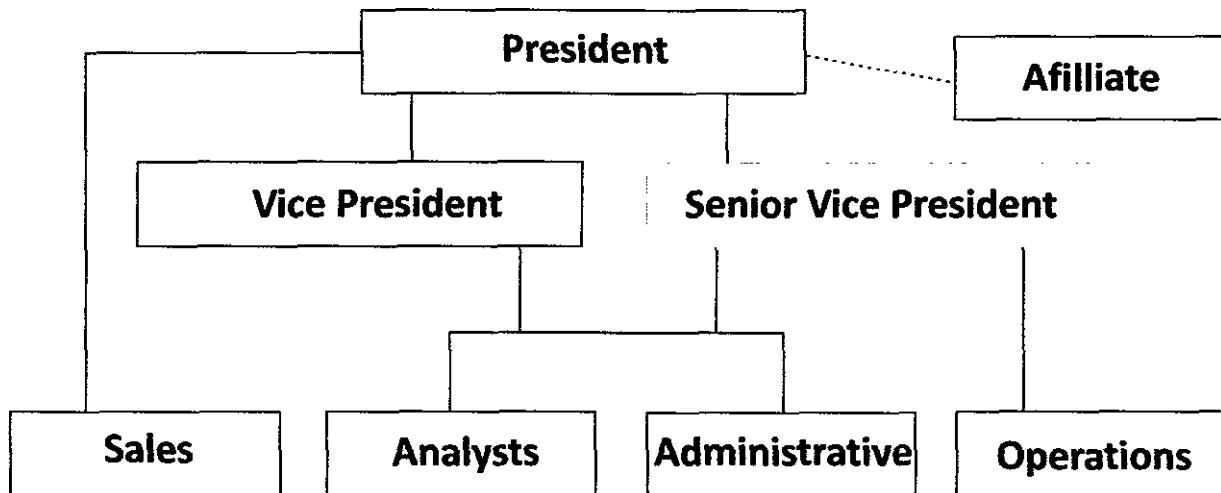


Exhibit D-1
Operations

The Applicant has been successfully providing its clients with energy management services since 1998. During this time, Applicant has provided its clients with a combination of contractual choices, including time and material, fixed price, percentage of savings, and utility usage fee-based. Applicant will continue to utilize the aforementioned contractual options for its Ohio clients.

For time and material, fixed price and percentage of savings engagements, Applicant provides detailed billing statements. The detailed billing statements include, but are not limited to: service performed, contracted price of service, date that service was performed, payment due date, and payment remittance address. For those clients opting for utility usage fee-based remuneration, Applicant's fees are included in their electric supply contract and are remitted directly from the electric supplier to the Applicant, in which case Applicant does not provide a billing statement.

Applicant responds to customer inquiries and complaints within twenty-four hours of the initial enquiry. Said response is generally via telephone but may be via facsimile or email as formally requested by the enquirer.

Exhibit D-2
Operations Expertise

Please refer to following resumes as evidence of Operations Expertise.

Michael L. R. Housley
President
The Legacy Energy Group, LLC

Michael Housley is the founder and President of The Legacy Energy Group, LLC (Legacy Energy), as well as a managing partner of Executive Energy Services, LLC. As President of Legacy Energy, Mr. Housley is responsible for managing Legacy's relationships with its key energy management clients and business partners. Mr. Housley is also responsible for planning and managing Legacy Energy's strategic growth in five primary business lines: energy procurement, risk management, information technology solutions, tariff analysis, and demand side management. Mr. Housley has negotiated venture capital/credit agreements, and expanded Legacy Energy's energy management business through an equity investment in Affiliated Power Purchasers International, LLC.

Mr. Housley has over twenty-five years of experience in the energy industry. Prior to founding Legacy Energy in 1998, Mr. Housley was Vice President of LG&E Energy Marketing (a subsidiary of Louisville Gas and Electric Company) where he managed its coal, natural gas, power, and risk management businesses in 23 states. Total revenues across the business lines under Mr. Housley's management exceeded \$300 million in 1997.

Mr. Housley received a Bachelor of Science in Chemical Engineering from North Carolina State University and his Masters Degree in Business Administration from Pacific Lutheran University in the state of Washington. Currently, Mr. Housley serves as the Power Marketing Representative on the Southeastern Electric Reliability Council ("SERC") Executive Committee. He is past Chairman of the Council of Industrial Boiler Owners' NOx Committee and is a frequent speaker at industry-sponsored seminars.

Delbert L. Roberts, Jr.
Senior Vice President
The Legacy Energy Group, LLC

Delbert Roberts is a partner and Senior Vice President of The Legacy Energy Group, LLC (Legacy Energy). Since joining Legacy Energy in 1999, Mr. Roberts has been responsible for negotiating and executing company wholesale power and transmission contracts and establishing operations systems to support wholesale power sales and purchases; training Legacy Energy staff to use the operations systems to reliably execute marketing and trading transactions; marketing Legacy Energy's consulting services to independent power and utility power development companies, energy marketing firms, retail energy customers, control areas and e-commerce system development companies; securing marketing agreements with companies and municipalities owning distributed generation resources for Legacy Energy's wholesale marketing business; executing retail supplier sales agency agreements; managing customers' retail electricity tariff rate evaluations throughout the United States and Canada; coordinating electricity supply procurement for retail electricity customers in CAISO, ERCOT, PJM, NYISO and ISO-NE; and developing and maintaining operational functionality for achieving the company's objective of excellence in business relationships.

Mr. Roberts has over thirty years of energy industry experience. Prior to joining Legacy Energy, Mr. Roberts was the Southeastern Regional Marketing Executive for LG&E Energy Marketing (a subsidiary of Louisville Gas and Electric Company) for three years where he was responsible for developing contractual infrastructure and originating wholesale energy transactions in the Southeastern United States. Prior to working with LG&E, Mr. Roberts was the Superintendent of Electric System Control for the City of Tallahassee, Florida. He managed the control and operations division of Tallahassee's 600 MW electric generation, transmission and distribution system with 20 employees and an annual operating budget of over \$40 million. Mr. Roberts' responsibilities included management of electric transmission and distribution systems operations, electric generation commitment and dispatch, energy management, load management and geographical information systems operations, wholesale energy sales and purchase transactions, transmission services sales and purchases, utility training and safety programs, relay and communications operation and maintenance, power sale and purchase contracts administration, fuels management and procurement, and energy accounting for the municipal's energy adjustment calculation

Mr. Roberts is a past Chairman of the Florida Electric Power Coordinating Group, Inc.'s ("FCG") Operating Committee and a past independent power representative on the Southeastern Electric Reliability Council's ("SERC") Engineering Executive Committee.

Thomas Ihrig
Vice President
The Legacy Energy Group, LLC

Thomas Ihrig is the Vice President of The Legacy Energy Group, LLC (Legacy Energy). He is also Secretary of Executive Energy Services, LLC (Executive Energy), an operations partner with Legacy Energy. Mr. Ihrig's principal responsibilities are following regulatory framework across the nation, modeling local distribution companies' (LDCs) tariffs, maintaining supplier relationships with energy service providers (ESPs), and commodity risk management.

Mr. Ihrig has over twenty years of experience in the energy industry. In that time, Mr. Ihrig has held positions of increasing responsibility working with commercial, industrial and municipal customers, both on the retail and wholesale level. Prior to joining Legacy Energy in August of 2000, Mr. Ihrig managed the gas and electric commodities for a number of nationwide clients of CMS Energy. Mr. Ihrig has extensive experience in the regulatory arena working with State Public Utility Commissions (PUCs) in their efforts to implement a viable competitive retail electric supply market. For the past ten years, Mr. Ihrig has analyzed the unbundling of the LDCs tariffs in those states with retail open access programs and modeled savings to determine opportunities for clients.

In 1988, Mr. Ihrig earned a Bachelor of Science degree in Mechanical Engineering from Ohio State University, and in 1996, he received his master of Business Administration degree from Central Michigan University.

Michael Stumpo
Energy Management Services
The Legacy Energy Group, LLC

Michael Stumpo is the Director, Energy Management Services of The Legacy Energy Group, LLC (Legacy Energy). Mr. Stumpo's principal responsibilities are direct client management, monitoring local distribution companies' tariffs as they relate to client rates and load profiles, maintaining supplier relationships with energy service providers (ESPs), and commodity risk management.

Mr. Stumpo's professional experience includes over thirty years of progressively responsible business and management experience, including key management and ownership roles in information technology, real estate acquisition, development and management, and energy. At Legacy Energy, Mr. Stumpo works extensively in a one-on-one role with key clients and strategic vendors in areas of client-specific energy management initiatives, energy procurement, data management and demand side management.

Mr. Stumpo earned his Bachelor of Science degree in Business Administration in 1984 from Clarion University in Clarion, Pennsylvania.

Exhibit D-3
Key Technical Personnel

Key Technical Personnel			
Name	Title	Email	Background
Michael Housley	President	mhousley@legacyenergy.com	Please see Exhibit D-2
Delbert Roberts	Senior Vice President	droberts@legacyenergy.com	Please see Exhibit D-2
Thomas Ihrig	Vice President	tihrig@legacyenergy.com	Please see Exhibit D-2
Mike Stumpo	En. Mgmt. Svcs.	mstumpo@legacyenergy.com	Please see Exhibit D-2