

*PUCOUSEO	NILVE-VORIOT 1:082	_
Date Received	Renewal Certification	ORIGINAL AGG
·	Number	Case Number
	·	09 - 950 - GA-AGG

RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS BROKERS/AGGREGATORS

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

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

		SECTION A	- Applicant	Informatio	N AND S	ERVICES		2
A-1	Applicant inte			s: (check all tha Natural Gas Bro	110,		PUCO	2019 OCT 15 PH 4: 02
A-2	Applicant info	rmation:					$\overline{\bigcirc}$	-T1
	Legal Name	Reflective Energy	y Solutions LLC				\bigcirc	
	Address	One University P	laza, Suite 407, Ha	nckensack, NJ 0760	1			: 02
	Telephone No.	(201) 880-1997		Web site	Address	www.reflecti	vees.com	
	Current PUCO Ce	ertificate No.	09-166G(5)	Effective Dates	12/7/20	17 thru 12/7/2	:019	
A-3	Applicant info	ormation unde	r which applica	ant will do busi	ness in O	hio:		
	Name Address	Reflective Energ	y Solutions LLC					
		One University F	Plaza, Suite 407, H	ackensack, NJ 0760	01			
	Web site Address	www.reflectivees	s.com	Telephor	ne No. (20	1) 880-1997		
A-4	List all names Reflective Energy S		he applicant d	oes business in l	North An	nerica:		
A-5	Contact perso	n for regulator	ry or emergenc	y matters:				
	Name Eric Zimm	ierman		Title	President			
	Business Address	One University	Plaza, Suite 407, I	Hackensack, NJ 076	01			
	Telephone No. (2	201) 880-1997	Fax No. (20	1) 540-2088	Email Add	lress ericz@i	reflectivee	s.com

Whis is to centify that the images are restricted and complete reproduction and document delivered in the receiver constants.

A-0	Contact person for Commission Staff use in investigating customer complaints:							
	Name Eric Zimmerman	Title	President					
	Business address One University Plaza, Suite 407, Hackensack, NJ 07601							
	Telephone No. (201) 880-1997 Fax No. (201) 540-208	38	Email Address ericz@reflectivees.com					
A-7	Applicant's address and toll-free number for cust	tomer serv	vice and complaints					
	Customer service address One University Plaza, Suite 407, Hackensack, NJ 07601							
	Toll-Free Telephone No. (888) 528-3695 Fax No. (201)	540-2088	Email Address ericz@reflectivees.com					
A-8	-8 Provide "Proof of an Ohio Office and Employee," in accordance with Section 4929.22 of the Ohi Revised Code, by listing name, Ohio office address, telephone number, and Web site address of designated Ohio Employee							
	Name Matthew Regimbal	Title	Business Development Manager					
	Business address 4450 Belden Village St. NW, Suite 608, Ca	inton, OH 447	718					
	Telephone No. (330) 701-5954 Fax No. (201) 540-2088	B Ema	ail Address mattr@reflectivees.com					
A-9	Applicant's federal employer identification numb	oer 27-06	692602					
A-10	Applicant's form of ownership: (Check one)							
	Sole Proprietorship	Partne	ership					
	Limited Liability Partnership (LLP)	✓ Limite	d Liability Company (LLC)					
	Corporation	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.)

	\sqrt{c}	Columbia Gas of Ohio	Residential	Small Commercia	l 🗸 Large Commercial / Industrial
	✓ r	Dominion East Ohio	R esidential	Small Commercia	al 🗸 Large Commercial / Industrial
	√ 1	Ouke Energy Ohio	R esidential	Small Commercia	l 🗸 Large Commercial / Industrial
	<u></u>	ectren Energy Delivery	of Ohio Residential	Small Commercia	l 🕢 Large Commercial / Industrial
A-12	Program date(s) the	is, for each service hat the applicant l		class, provide appi	ny of Ohio's Natural Gas Choice roximate start date(s) and/or end
	Colum	ibia Gas of Ohio			
		Residential	Beginning Date of Servi	ce	End Date
		Small Commercial	Beginning Date of Servi	ce	End Date
		Large Commercial	Beginning Date of Servi	ce	End Date
		Industrial	Beginning Date of Servi	ce	End Date
	Domir	nion East Ohio			
		Residential	Beginning Date of Servi	ce	End Date
		Small Commercial	Beginning Date of Servi	ce	End Date
		Large Commercial	Beginning Date of Servi	ce	End Date
		Industrial	Beginning Date of Servi	ce	End Date
	Duke	Energy Ohio			
		Residential	Beginning Date of Servi	ce	End Date
		Small Commercial	Beginning Date of Servi	ce	End Date
		Large Commercial	Beginning Date of Servi	ce	End Date
		Industrial	Beginning Date of Servi	ce	End Date
	Vectr	en Energy Delivery o	of Ohio		
		Residential	Beginning Date of Servi	ce	End Date
		Small Commercial	Beginning Date of Servi	ce	End Date
		Large Commercial	Beginning Date of Servi	ce	End Date
		Industrial	Beginning Date of Servi	ce	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:

Columbia Gas of Ohio	Intended Start Date
Dominion East Ohio	Intended Start Date
Duke Energy Ohio	Intended Start Date
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.
- A-15 Exhibit A-15 "Company History," provide a concise description of the applicant's company history and principal business interests.
- A-16 Exhibit A-16 "Articles of Incorporation and Bylaws," provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto, only if the contents of the originally filed documents changed since the initial application.
- A-17 Exhibit A-17 "Secretary of State," provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- B-1 Exhibit B-1 "Jurisdictions of Operation," provide a current list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail natural gas service, or retail/wholesale electric services.
- B-2 <u>Exhibit B-2 "Experience & Plans,"</u> provide a current description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.
- B-3 Exhibit B-3 "Summary of Experience," provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking renewed certification (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).
- B-4 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

status or ability to provide the services for which it is seeking renewed certification since applicant last filed for certification.

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

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

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

✓ No [Yes
--------	-----

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

SECTION C - APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- C-1 Exhibit C-1 "Annual Reports," provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information, labeled as Exhibit C-1, or indicate that Exhibit C-1 is not applicable and why.

 (This is generally only applicable to publicly traded companies who publish annual reports.)
- C-2 <u>Exhibit C-2 "SEC Filings,"</u> provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 whether the applicant is not required to file with the SEC and why.
- C-3 <u>Exhibit C-3 "Financial Statements,"</u> provide copies of the applicant's two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer certified financial statements covering the life of the business. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns (with social security numbers and account numbers redacted).

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

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

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

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

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

- C-5 <u>Exhibit C-5 "Forecasted Financial Statements</u>," provide two years of forecasted income statements for the applicant's NATURAL GAS related business activities in the state of Ohio Only, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer. The forecasts should be in an annualized format for the two years succeeding the Application year.
- C-6 Exhibit C-6 "Credit Rating," provide a statement disclosing the applicant's current credit rating as reported by two of the following organizations: Duff & Phelps, Fitch IBCA, Moody's Investors Service, Standard & Poor's, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or an affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant. If an applicant or its parent does not have such a credit rating, enter "N/A" in Exhibit C-6.
- C-7 Exhibit C-7 "Credit Report," provide a copy of the applicant's current credit report from Experion, Dun and Bradstreet, or a similar organization. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter "N/A" for Exhibit C-7.

- C-8 Exhibit C-8 "Bankruptcy Information," provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.
- C-9 Exhibit C-9 "Merger Information," provide a statement describing any dissolution or merger or acquisition of the applicant within the two most recent years preceding the application.
- C-10 Exhibit C-10 "Corporate Structure," provide a description of the applicant's corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.

SECTION D - APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- D-1 <u>Exhibit D-1 "Operations</u>," provide a current written description of the operational nature of the applicant's business functions.
- D-2 <u>Exhibit D-2 "Operations Expertise</u>," given the operational nature of the applicant's business, provide evidence of the applicant's current experience and technical expertise in performing such operations.
- D-3 <u>Exhibit D-3 "Key Technical Personnel</u>," provide the names, titles, email addresses, telephone numbers, and background of key personnel involved in the operational aspects of the applicant's current business.

Applicant Signature and Title

Sworn and subscribed before me this

are of official administering oath

Print Name and Title

My commission expires on

Notary Public, State of New Jen No. 8410306
Qualified in Bergen County
My Commission Exches July 7. 8

Year

Page 6 of 7



The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service Affidavit Form (Version 1.07)

In	the Matter of the Application of				
Ref	ective Energy Solutions LLC Case No. 09 - 950 -GA-AGG				
for	a Certificate or Renewal Certificate to Provide				
Co	mpetitive Retail Natural Gas Service in Ohio.				
	te of New Tersa				
	Eric Zimmerman [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				
	Sworn and subscribed before me this 29 day of Sulmin Month 2019 Year				
	Signature of Official Administering Oath Print Name and Title Notary Public, State New Jorsey No. 2410308 Qualified in Bergen County My Commission Explores July 7, 2021				

My commission expires on

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.

Steven Margulies, Chairman & CEO One University Plaza, Suite 407 Hackensack, NJ 07601 (201) 880-1997

Eric Zimmerman, President One University Plaza, Suite 407 Hackensack, NJ 07601 (201) 880-1997 Exhibit A-15 "Company History" provide a concise description of the applicant's company history and principal business interests.

Reflective Energy Solutions was founded in 2009, and is now active in sixteen states (eight of which as a broker/marketer of both electricity and natural gas).

Its principal business interests are focused on helping business clients make energy procurement decisions that best meet their needs. In return for this service, if/when a customer enters into a contract with a natural gas supplier, Reflective will be compensated based upon a fixed fee, or commission previously agreed to with the electricity supplier. Reflective Energy Solutions is not an electricity supplier and will not be purchasing, or taking title to, the commodity, but will be advising clients concerning their needs.

Exhibit A-16 "Articles of Incorporation and Bylaws," provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto, only if the contents of the originally filed documents changed since the initial application.

N/A.

Exhibit A-17 "Secretary of State," provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

Please see the attached Certificate of Good Standing from the Ohio Department 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 REFLECTIVE ENERGY SOLUTIONS LLC, a New Jersey For Profit Limited Liability Company, Registration Number 1887122, filed on October 5, 2009, 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 25th day of September, A.D. 2019.

Ohio Secretary of State

Fred for

Validation Number: 201926801508

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.

- 1) New York;
- 2) New Jersey;*
- 3) Texas;
- 4) California;
- 5) Georgia;
- 6) Delaware;
- 7) Maryland;*
- 8) Illinois;*
- 9) New Hampshire;
- 10) Connecticut;
- 11) Rhode Island;*
- 12) Pennsylvania;*
- 13) Ohio;*
- 14) Massachusetts;*
- 15) District of Columbia; and
- 16) Maine.*

The asterisk indicates states wherein Reflective Energy Solutions LLC maintains a license to operate as a broker/marketer of electrical energy and/or natural gas.

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.

Reflective Energy Solutions LLC is an energy brokerage company, established in 2009, that organizes and presents complex energy information in an objective, easy to understand format, enabling businesses to make energy procurement decisions that best meet their needs. In return for this service, if/when a customer enters into a contract with a natural gas supplier, Reflective will be compensated based upon a fixed fee, or commission previously agreed to with the electricity supplier. Reflective Energy Solutions is not an electricity supplier and will not be purchasing, or taking title to, the commodity, but will be advising clients concerning their needs.

Exhibit B-3: Summary of Experience provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking renewed certification (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).

Reflective Energy Solutions LLC has acted as a broker of Natural Gas services to 40 commercial clients throughout Ohio, six (6) in the service area of Columbia Gas of Ohio, one (1) in the service area of Vectren Energy Delivery of Ohio and twenty-three (23) in the service area of Dominion East Ohio.

Exhibit B-4 "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.

None.

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.

Reflective Energy Solutions LLC is a privately held company with a limited number of members therefore it is not required to compile an Annual Report, nor does it compile an Annual Report as a matter of it's regular course of business.

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. 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.

Reflective Energy Solutions LLC is a privately held company with a limited number of members and is therefore not required to make filings with the 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.

Please see attached Exhibit C-3. Please note that this information is confidential and will be filed under seal.

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.).

N/A. Reflective Energy Solutions LLC, as a broker, will not take title to, or take physical possession of, any commodity and therefore has no need for such arrangements.

Exhibit C-5 "Forecasted Financial Statements," provide two years of forecasted financial statements (balance sheet, income statement, and cash flow statement) for the applicant's CRES operation, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer.

Please see attached Exhibit C-5. Please note that this information is confidential and will be filed 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, Dun and Bradstreet Information Services, Fitch IBCA, Moody's Investors Service, Standard & Poors, 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 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.

Reflective Energy Solutions LLC, is a privately held limited liability company and it is not rated by credit rating agencies.

Exhibit C-7 "Credit Report," provide a copy of the applicant's credit report from Experion, Dun and Bradstreet or a similar organization.

Please see attached Exhibit C-7. Please note that this information is confidential and will be filed under seal.

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.

None.

Exhibit C-9 "Merger Information," provide a statement describing any dissolution or merger or acquisition of the applicant within the five most recent years preceding the application.	
None.	

Exhibit C-10 "Corporate Structure," provide a description of the applicant's corporate structure, 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 and companies that aggregate customers in North America.



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

Reflective Energy Solution begins with a thorough assessment of each businesses' unique needs. Based on careful analysis, it works with clients to devise customized energy strategies to maximize energy savings. For energy procurement, it then negotiates with the energy suppliers. From beginning to end, clients can expect expert counsel from a supplier-neutral team that always puts its clients' needs first.

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.

Reflective Energy Solutions was founded in 2009, and has grown its operational base to sixteen states. Each member of the Reflective team brings unique skills and years of experience.

Steven Margulies, CEO

Steven Margulies has extensive experience managing rapid growth companies in the energy business, as well as in the consumer finance industry. Prior to leading Reflective, he worked in the Investment Management business including Portfolio Management, Investment Banking, Private Equity, Venture Capital and Equities Research. In addition, he spent over three years as a corporate and securities attorney. Mr. Margulies received his Master's of Business Administration in Finance and his Juris Doctor jointly from NYU Stern and NYU School of Law in 1988; and his Bachelor of Science degree in Economics and Management from NYU Stern in 1985.

Eric Zimmerman, President

Eric Zimmerman has been in the competitive energy business for more than a dozen years working in a senior capacity at some of the largest retail energy companies across North America, most recently with Constellation Energy. Prior to working with Reflective, Eric held senior management roles for companies in both the for-profit as well as non-profit worlds. Zimmerman is a graduate of Yeshiva University with a Bachelor of Science degree in Finance.

Reflective's Sales Team

The Reflective sales team has over 50 years of combined experience in the energy sector. The business development professionals at Reflective honed their expertise working in companies such as Constellation Energy, Direct Energy, Integrys Energy, and Sprague Energy. Our sales team is well versed in marketing natural gas, electricity, demand-response and energy efficiency programs, as well as alternative energy, with proficiency in areas of rate analysis and market research. Their experience working in the commercial and industrial energy market, combined with their knowledge of industry standards and how regulations can vary state-to-state, are what equips the Reflective sales team to address your specific needs.

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.

Steven Margulies, Chairman & CEO One University Plaza, Suite 407 Hackensack, NJ 07601 (201) 880-1997

Eric Zimmerman, President One University Plaza, Suite 407 Hackensack, NJ 07601 (201) 880-1997