

FILE

20-0565-EL-AGG



PUCO USE ONLY		
Date Received	Case Number	Version
	- EL-AGG	May 2016

INITIAL CERTIFICATION APPLICATION FOR ELECTRIC AGGREGATORS/ POWER BROKERS

Please print or type all required information. Identify all attachments with an exhibit label and title (Example: Exhibit A-12 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 input information directly onto the form.
You may also download the form, by saving it to your local disk, for later use.

A. APPLICANT INFORMATION

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

☒ Power Broker ☐ Aggregator

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

Legal Name Energy Advisory Solutions, LLC
Address 13 Fancher Rd. Warwick NY 10990
Telephone # (914) 589-8562 Web site address (if any) www.energyadvisorysolutions.com

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

Legal Name Energy Advisory Solutions, LLC
Address 13 Fancher Rd. Warwick, NY 10990
Telephone # (914) 589-8562 Web site address (if any) www.energyadvisorysolutions.com

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

Energy Advisory Solutions, LLC
Susan E. Golden, LLC

A-5 Contact person for regulatory or emergency matters

Name Susan E Golden
Title Owner

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician DR Date Processed 3/9/20

2020 MAR -9 PM 1:16

PUCO

Business address 13 Fancher Rd, Warwick NY 10990
Telephone # (914) 589-8562 Fax # (845) 839-2798
E-mail address susangolden@energyadvisorysolutions.com

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

Name Susan E. Golden
Title Owner
Business address 13 Fancher Rd. Warwick, NY 10990
Telephone # (914) 589-8562 Fax # (845) 839-2798
E-mail address susangolden@energyadvisorysolutions.com

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

Customer Service address 13 Fancher Rd. Warwick NY 10990
Toll-free Telephone # (800) 579-3592 Fax # (845) 839-2798
E-mail address info@energyadvisorysolutions.com

A-8 Applicant's federal employer identification number # 810913561

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 _____ |

A-10 (Check all that apply) Identify each electric distribution utility certified territory in which the applicant intends to provide service, including identification of each customer class that the applicant intends to serve, for example, residential, small commercial, mercantile commercial, and industrial. (A mercantile customer, as defined in (A) (19) of Section 4928.01 of the Revised Code, is a commercial customer who consumes more than 700,000 kWh/year or is part of a national account in one or more states).

- | | | | | |
|--|--------------------------------------|--|--|--|
| <input type="checkbox"/> First Energy | | | | |
| <input type="checkbox"/> Ohio Edison | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input type="checkbox"/> Toledo Edison | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input type="checkbox"/> Cleveland Electric Illuminating | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input type="checkbox"/> Duke Energy | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input type="checkbox"/> Monongahela Power | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input type="checkbox"/> American Electric Power | | | | |
| <input type="checkbox"/> Ohio Power | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input type="checkbox"/> Columbus Southern Power | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |
| <input type="checkbox"/> Dayton Power and Light | <input type="checkbox"/> Residential | <input checked="" type="checkbox"/> Commercial | <input checked="" type="checkbox"/> Mercantile | <input checked="" type="checkbox"/> Industrial |

- A-11 Provide the approximate start date that the applicant proposes to begin delivering services

March 15, 2020

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- A-12 **Exhibit A-12 "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-13 **Exhibit A-13 "Company History,"** provide a concise description of the applicant's company history and principal business interests.
- A-14 **Exhibit A-14 "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.
- A-15 **Exhibit A-15 "Secretary of State,"** provide evidence that the applicant has registered with the Ohio Secretary of the State.

B. APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- B-1 **Exhibit B-1 "Jurisdictions of Operation,"** provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail or wholesale electric services including aggregation services.
- B-2 **Exhibit B-2 "Experience & Plans,"** provide a description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

B-3 **Exhibit B-3 "Summary of Experience,"** provide a concise summary of the applicant's experience in providing aggregation service(s) including contracting with customers to combine electric load and representing customers in the purchase of retail electric services. (e.g. number and types of customers served, utility service areas, amount of load, etc.).

B-4 **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.

B-5 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-5 "Disclosure of Consumer Protection Violations"** detailing such violation(s) and providing all relevant documents.

B-6 Disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail or wholesale electric service including aggregation service denied, curtailed, suspended, revoked, or cancelled within the past two years.

☒ No ☐ Yes

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

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 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 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 **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.

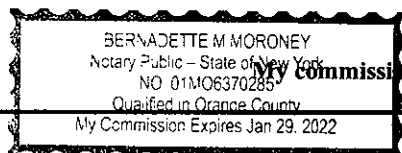
- C-6 **Exhibit C-6 "Credit Rating,"** provide a statement disclosing the applicant's credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody's Investors Service, Standard & Poors, or a similar organization. In instances 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. If an applicant or its parent does not have such a credit rating, enter "N/A" in Exhibit C-6.
- C-7 **Exhibit C-7 "Credit Report,"** provide a copy of the applicant's credit report from Experian, Dun and Bradstreet or a similar organization. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter "N/A" for Exhibit C-7.
- C-8 **Exhibit C-8 "Bankruptcy Information,"** provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.
- C-9 **Exhibit C-9 "Merger Information,"** provide a statement describing any dissolution or merger or acquisition of the applicant within the two most recent years preceding the application.
- C-10 **Exhibit C-10 "Corporate Structure,"** provide a description of the applicant's corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.


Signature of Applicant & Title

Sworn and subscribed before me this 27th day of February, 2020


Signature of official administering oath

Month Year
Notary - Bernadette M Moroney
Print Name and Title



My commission expires on

1/29/2022

AFFIDAVIT

State of New York:

Warwick
(Town)

County of Orange:

Susan E. Golden

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

He/She is the Owner (Office of Affiant) of Energy Advisory Solutions, LLC (Name of Applicant);

That he/she is authorized to and does make this affidavit for said Applicant,

1. The Applicant herein, attests under penalty of false statement that all statements made in the application for certification are true and complete and that it will amend its application while the application is pending if any substantial changes occur regarding the information provided in the application.
2. The Applicant herein, attests it will timely file an annual report with the Public Utilities Commission of Ohio of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Division (A) of Section 4905.10, Division (A) of Section 4911.18, and Division (F) of Section 4928.06 of the Revised Code.
3. The Applicant herein, attests that it will timely pay any assessments made pursuant to Sections 4905.10, 4911.18, or Division F of Section 4928.06 of the Revised Code.
4. The Applicant herein, attests that it will comply with all Public Utilities Commission of Ohio rules or orders as adopted pursuant to Chapter 4928 of the Revised Code.
5. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, and its Staff on any utility matter including the investigation of any consumer complaint regarding any service offered or provided by the Applicant.
6. The Applicant herein, attests that it will fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
7. The Applicant herein, attests that it will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
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 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.

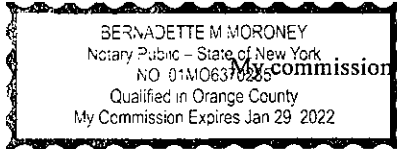
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief and that he/she expects said Applicant to be able to prove the same at any hearing hereof.

Susan E. Galdin, owner
Signature of Affiant & Title

Sworn and subscribed before me this 27th day of February, 2020
Month Year

Bernadette M. Moroney
Signature of official administering oath

Notary - Bernadette M. Moroney
Print Name and Title



My commission expires on 1/29/2022

Exhibit A-12 "Principal Officers, Directors & Partners"

Owner:

Susan E. Golden

13 Fancher Rd.

Warwick, NY 10990

914-589-8562

(100% ownership and control)

Exhibit A-13 “Company History”

Energy Advisory Solutions, LLC

Energy Advisory Solutions, LLC is a single member LLC, (treated as a S Corp.) which was incorporated in New York in December of 2015. I typically enter into long term comprehensive contracts with my clients who are primarily large multi-site US based commercial and industrial corporations. The majority of those contracts include electricity brokerage as a service along with other services.

I do not now and have never marketed directly to any customer, nor do I have any “brokerage only” clients. My clients are acquired solely through referrals from existing clients.

Service Offering Summary

For Commercial and Industrial Large Energy Users:

Offering comprehensive review, analysis and evaluation of existing / current energy program and expense management for large commercial, industrial and multi-site retail energy users.

Providing identification, quantification and implementation of energy and utility savings / refunds, cash flow improvement, process improvement, energy efficiency and sustainability initiatives in addition to ongoing energy management and sourcing / procurement support.

Suite of service offerings includes but is not limited to:

- Sourcing and procurement evaluation, forensic analysis and contract performance review, forward strategy and benchmarking.
- Sourcing and procurement of electricity, natural gas (commodity and basis), oil and propane.
- Market intelligence and forecasting.
- Risk tolerance analysis.
- Invoice processing evaluation and validation accuracy review.
- Budget process review and evaluation.
- Ongoing budget and accrual support.
- Process improvement across energy / utility category (supply, demand and financial).
- Energy efficiency / sustainability initiative program review and analysis.
- Utility expense cash flow review analysis.
- Rate and tariff optimization review.
- Utility tax treatment review and analysis.

For Energy Suppliers and Energy Efficiency Companies:

- Offering contract or task-based project analysis to include:
- Load modelling
- Avoided cost tariff analysis,

- Procurement service for residual load as appropriate
- Proposal review and editing
- Energy Efficiency rebate and incentive quantification
- Financial modelling
- Savings validation

Exhibit A-14 Articles of Incorporation

N. Y. S. DEPARTMENT OF STATE
DIVISION OF CORPORATIONS AND STATE RECORDS

ALBANY, NY 12231-0001

FILING RECEIPT

ENTITY NAME: ENERGY ADVISORY SOLUTIONS, LLC

DOCUMENT TYPE: ARTICLES OF ORGANIZATION (DOM LLC)

COUNTY: ORAN

FILED:12/18/2015 DURATION:***** CASH#:151218000622 FILM #:151218000585
DOS ID:4866691

FILER:

CHEYENNE MOSELEY
C/O LEGALZOOM.COM, INC.
9900 SPECTRUM DRIVE
AUSTIN, TX 78717

EXIST DATE

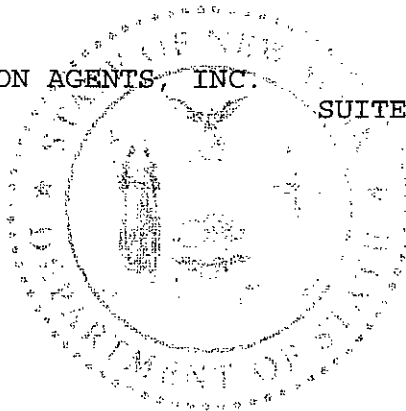
12/18/2015

ADDRESS FOR PROCESS:

C/O UNITED STATES CORPORATION AGENTS, INC.
7014 13TH AVENUE SUITE 202
BROOKLYN, NY 11228

REGISTERED AGENT:

UNITED STATES CORPORATION AGENTS, INC.
7014 13TH AVENUE SUITE 202
BROOKLYN, NY 11228



The limited liability company is required to file a Biennial Statement with the Department of State every two years pursuant to Limited Liability Company Law Section 301. Notification that the biennial statement is due will only be made via email. Please go to www.email.ebiennial.dos.ny.gov to provide an email address to receive an email notification when the Biennial Statement is due.

SERVICE COMPANY: LEGALZOOM.COM, INC. - AF

SERVICE CODE: AF *

FEEs	235.00
FILING	200.00
TAX	0.00
CERT	0.00
COPIES	10.00
HANDLING	25.00

PAYMENTS	235.00
CASH	0.00
CHECK	0.00
CHARGE	0.00
DRAWDOWN	235.00
OPAL	0.00
REFUND	0.00

DOS-1025 (04/2007)

STATE OF NEW YORK
DEPARTMENT OF STATE

I hereby certify that the annexed copy has been compared with the original document in the custody of the Secretary of State and that the same is a true copy of said original.



WITNESS my hand and official seal of the
Department of State, at the City of Albany,
on December 21, 2015.

Anthony Giardina

Anthony Giardina
Executive Deputy Secretary of State

151218000585

ARTICLES OF ORGANIZATION

OF

Energy Advisory Solutions, LLC

Under Section 203 of the Limited Liability Company Law

FIRST. The name of the limited liability company is Energy Advisory Solutions, LLC.

SECOND. The county within this state in which the limited liability company is to be located is Orange.

THIRD: The secretary of state is designated as agent of the limited liability company upon whom process against it may be served. The address within or without this state to which the Secretary of State shall mail a copy of any process accepted on behalf of the limited liability company served upon him or her is: c/o United States Corporation Agents, Inc., 7014 13th Avenue, Suite 202, Brooklyn, NY 11228.

FOURTH: The name and street address in this state of the registered agent upon whom and at which process against the limited liability company may be served is: United States Corporation Agents, Inc., 7014 13th Avenue, Suite 202, Brooklyn, NY 11228.

IN WITNESS WHEREOF, the undersigned has executed these Articles of Organization on the date below.

LegalZoom.com, Inc., Organizer

Date: December 18, 2015

/s/ Cheyenne Moseley

By: Cheyenne Moseley, Assistant Secretary
9900 Spectrum Drive
Austin, TX 78717

151218000585

585

ARTICLES OF ORGANIZATION

OF

Energy Advisory Solutions, LLC

Under Section 203 of the Limited Liability Company Law

165
STATE OF NEW YORK
DEPARTMENT OF STATE
FILED DEC 18 2015
TAXS
BY: W

Filed By: Cheyenne Moseley
c/o LegalZoom.com, Inc.
9900 Spectrum Drive
Austin, TX 78717

FILED

2015 DEC 18 PM 1:48

Drawdown
Account: AF
LegalZoom.com, Inc.

RECEIVED

2015 DEC 18 AM 11:04

622

Exhibit A-15 "Secretary of State"



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	CERT	COPY
03/03/2020	202005701960	REGISTRATION OF FOREIGN FOR PROFIT LLC (LFP)	99.00	0.00	0.00	0.00

Receipt

This is not a bill. Please do not remit payment.

ENERGY ADVISORY SOLUTIONS, LLC
13 FANCHER RD.
WARWICK, NY 10990

STATE OF OHIO CERTIFICATE

Ohio Secretary of State, Frank LaRose
4442854

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

ENERGY ADVISORY SOLUTIONS, LLC

and, that said business records show the filing and recording of:

Document(s)

REGISTRATION OF FOREIGN FOR PROFIT LLC

Effective Date: 02/26/2020

Document No(s):

202005701960



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio this
3rd day of March, A.D. 2020.

Frank LaRose
Ohio Secretary of State

Exhibit B-1 "Jurisdiction of Operation":

As of the date of filing Energy Advisory Solutions, LLC is licensed as an Energy Broker in Texas.

License applications are pending in Maryland, Massachusetts, Maine and Pennsylvania and most of those licenses are expected any day now.

Energy Advisory Solutions, LLC also provides energy brokerage services to client sites in several states that do not require licensing at this time including:

- New York
- New Jersey
- California
- Oregon
- Virginia
- Illinois (client loads are large enough to bypass licensing requirements)

Energy Advisory Solutions, LLC also provides natural gas brokerage services for which no licensing is required in:

- Missouri
- Colorado
- Wisconsin
- California
- New York
- New Jersey

Exhibit B-2 "Experience & Plans"

Energy Advisory Solutions, LLC will be providing energy brokerage services to existing clients with sites in Ohio pursuant to the existing language in our client contracts which is exactly as, or materially similar to, the below:

Energy Commodity Procurement:

- Energy Advisory Solutions, LLC (EAS) will act as Client's broker for all energy commodity procurement in deregulated states where Client maintains a business presence.
- EAS to conduct energy procurement utilizing the "Strategic Summary & Risk Analysis" and "Energy Procurement Process" as outlined in Appendix A.

Energy Procurement Professional Fees:

EAS's fees for energy commodity procurement shall be in the form of a per kWh / dTh adder of \$0.XXXX per kWh and \$0.XXXper dTh for invoiced energy usage pursuant to all third party energy commodity contracts placed during the term of the engagement. Typically, these adders will be incorporated into the contract rate for electricity or natural gas and payment shall be made to EAS directly by the third-party supplier.

I have appended our Appendix A which outlines the energy brokerage process that is employed with each client.

Energy Advisory Solutions, LLC is available to all clients 24 hours a day via business phone, owner's cell phone, email, text messaging and fax for any questions, concerns or complaints.

Appendix A

Sample Strategy Summary and Risk Analysis

Site: Mountville, PA
 Utility: FPL
 Annual kWh: 8,293,749
 Incumbent Supplier: GDF Suez
 Current: Fixed rate \$0.05876 per kWh
 Current: Fixed rate annual cost: \$487,340

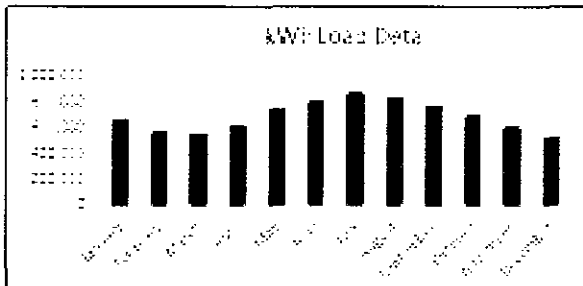
Projected annual cost for recommended solutions:
 12 Month Fixed: at or under \$450,350
 24 Month adder w/blocks: at or under \$450,350

Recommended Solution:

Best final 12 month fixed price at or under \$0.0543

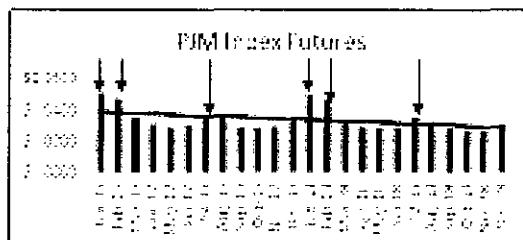
or

Best final 24 month adder price at or under \$0.02 with 1
 MW RTC block purchases for January, February and July.



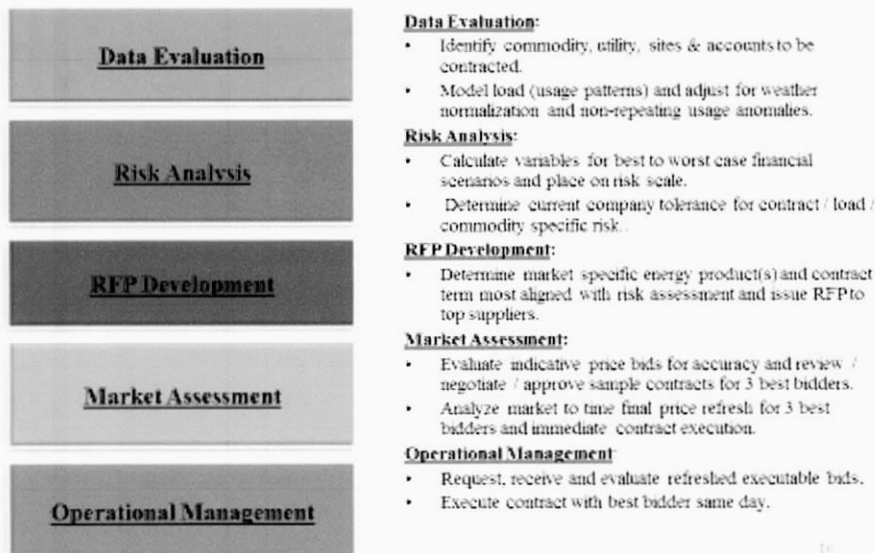
Term	Tariff Projection Range	Tariff Annual Cost Projection
12 Months	\$0.0374 - \$0.0774	\$641,936
24 Months	\$0.0260 - \$0.0760	\$650,325

Term	Fixed Price Bid Range	Fixed Price Annual Cost Range
12 Months	\$0.0500 - \$0.0580	\$414,687 - \$481,037
24 Months	\$0.0500 - \$0.0580	\$414,687 - \$481,037



Term	Adder Range	Index Futures Range	Adder + Index High Low Annual Cost Range	Forecast Annual Cost Range
12 Months	\$0.0165 - \$0.0271	\$0.02826 - \$0.04154	\$371,228 - \$569,233	\$426,298 - \$514,213
24 Months	\$0.0165 - \$0.0271	\$0.02790 - \$0.04063	\$368,242 - \$561,739	\$421,322 - \$509,236

Overview of Energy Procurement Process



Data Evaluation

- Review expiring contract(s) for end dates, renewal notice provisions, roll over provisions and current pricing / billing structure.
- Review and revise account list as necessary / Scrub historical load data for included accounts.
- Normalize aggregated loads for historical weather ratio averages as appropriate.
- Determine anticipated load changes based on efficiency projects / business function changes and adjust baseline load data accordingly.
- Model / type loads for included accounts.
 - Electricity:
 - Verify contract demands / peak demands/ capacity and transmission obligations with LDCs by account and project anticipated changes
 - Natural Gas:
 - Develop dTh contract quantities per site / aggregation group based on % of smoothed and normalized historical usage.
- Configure pricing aggregations per LDC / city gate / load type and size.

Risk Analysis

- Compare available tariff rate options for each account.
- Model tariff commodity cost options for each account.
- Model fixed rate options for terms up to 24 months.
- Model basis / hedged load options for terms up to 24 months including maximum likely swing based on historical pricing as well as various hedging scenarios (layered, blocked, float% etc.).
- Prepare best to worst financial impact scale along with indicative risk % analysis for each option along with appropriate charting and graphing for executive level review
- Gain executive level consensus re/ current company risk appetite and prioritization of budget certainty vs. greater potential savings / losses.

RFP Development

- Evaluate available energy products (tariff & third party) and select product(s) and term(s) most closely aligned with market forecasts and risk assessment conclusions.
 - Electricity:
 - Review selected suppliers block shaping and purchasing availability and product invoicing process as necessary.
 - Natural Gas:
 - Review selected suppliers trading desk / hedging process as necessary.
- Select top suppliers for selected product (unless tariff is selected) and request redline copy of Master Service Agreement and Transaction Confirmation documents.
- Draft RFP documents including product and term requirements, load data and relevant pricing parameters.
- Execute LOA's for all solicited markets.
- Select return date and time for indicative bids and issue RFP with account / meter list, load data and LOAs to selected suppliers
- Request confirmation of intention to bid and serve load and initiate credit review process.

Market Assessment

- Receive indicative bids on selected date / time.
- Review credit requirements of bidding suppliers.
- Review indicative bids for accuracy and compliance with specified benchmarks and product components.
- Review redline contracts of top 2-3 credit approved bidding suppliers, make necessary business edits (i.e / payment terms, cancellation clauses, bandwidth parameters etc) and return to supplier for review and approval.
- Upon receipt of business edit approval from suppliers, forward contracts for legal review and negotiate legal's redline changes with suppliers.
- Provide indicative price ranking feedback to top 2-3 suppliers.
- Analyze market conditions and forecasts, select return date for final executable bids

Operational Management

- Issue refresh date and time and final product / term parameters to final supplier pool.
- Receive and evaluate refreshed executable bids.
- Request executable contract from winning supplier.
- Review executable contract / transaction confirmation and verify price and term.
- Execute contract, return to supplier and request and receive "lock-in" confirmation
- Issue letter of non-renewal to incumbent supplier if applicable.
- Request fully executed contract.
- Monitor invoices after enrollment date for all accounts to ensure timely enrollment and accurate invoicing.

Exhibit B-3 “Summary of Experience”

Energy Advisory Solutions, LLC currently provides energy management services for 6 clients with a combined 276 commercial / industrial sites in 37 states.

The total annual deregulated electricity load of those clients that is currently contracted with Energy Advisory Solutions, LLC for energy brokerage service is 212,074 MWH (212,074,590 kWh).

Employment Experience of Susan E. Golden, Owner

Energy Advisory Solutions, LLC, Warwick, NY

December 2015 – Present, Owner

Offering comprehensive review, analysis and evaluation of existing / current energy program and expense management for large commercial, industrial and multi-site retail energy users.

Providing identification, quantification and implementation of energy and utility savings / refunds, cash flow improvement, process improvement, energy efficiency and sustainability initiatives in addition to ongoing energy management and sourcing / procurement support.

Suite of service offerings includes but is not limited to:

- Sourcing and procurement evaluation, forensic analysis and contract performance review, forward strategy and benchmarking.
- Sourcing and procurement of electricity, natural gas (commodity and basis), oil and propane.
- Market intelligence and forecasting.
- Risk tolerance analysis.
- Invoice processing evaluation and validation accuracy review.
- Budget process review and evaluation.
- Ongoing budget and accrual support.
- Process improvement across energy / utility category (supply, demand and financial).
- Energy efficiency / sustainability initiative program review and analysis.
- Utility expense cash flow review analysis.
- Rate and tariff optimization review.
- Utility tax treatment review and analysis.

Great Atlantic & Pacific Tea Company, Inc, Montvale, NJ

December 2013 – December 2015, Senior Director Energy Management

Manage all aspects of 110M energy spend throughout 300+ grocery stores, warehouses and offices.

Responsibilities:

- P&L responsibility for company-wide energy / utility spend of 110M.
- Procurement and layered hedging / purchasing of all natural gas, propane, oil and electricity.
- Negotiation of commodity product structure, price and contract terms.
- Contract management and performance tracking.
- Analysis of global energy fundamentals and weekly forecasting of energy market movement and impact throughout company footprint
- Ongoing risk management strategy development and implementation.
- Energy budget development / performance tracking and reporting.
- Utility rate and tariff optimization.
- Utility invoice expense audit and validation.
- Utility accrual and utility tax accrual including production credit validation and tracking

- Development and management of efficiency optimization pilot project.
- Business case development and presentation for energy and lighting component for all EMR and remodel projects.

NUS CONSULTING GROUP, Park Ridge, NJ

March 2011-December 2013, Senior Energy Consultant / Rate and Tariff Analyst

Manage portfolio of 40+ national and global multi-site commercial and industrial / manufacturing clients.

Ranked 3rd globally in revenue generation in a field of 350.

Responsibilities:

- Auditing of all energy expenditures and investigation and resolution of all usage, expenditure and billing anomalies.
- Review and analysis of all available LDC tariff rates as well as state and local tax law for each client site. Detailed reporting of findings to client and implementation of appropriate changes to minimize client expenditure and achieve all possible refunds and credits.
- Analysis of project feasibility and projected client ROI for special projects including voltage increases, demand response participation, alternate energy generation (solar, co-gen., dual fuel etc.)
- Client risk tolerance analysis together with development and execution of comprehensive multi-layer energy hedging strategy in deregulated markets including load analysis, setting of triggers, coordination of trades and ongoing performance analysis, tracking and reporting.
- Sourcing and procurement of energy commodity and basis in deregulated markets including load profile analysis, developing and issuing RFPs to qualified suppliers, bid comparison and analysis and contract negotiation and execution.
- Development of multiyear client energy budgets utilizing projected production schedules, analysis of forward LDC tariff rate cases and commodity market analysis and projections. Customized reporting and performance tracking of same.

HUDSON ENERGY SERVICES LLC, Suffern, NY

2009-2011 Director of Operations / Director of Special Projects

Restructured total residential ESCO sales and support system resulting in a 98% decrease in PSC complaints and a 75% increase in residential customer retention.

Developed and implemented business wide sales and margin tracking and reporting procedures.

Responsibilities:

- All sales and attrition reporting and analysis.
- Customer retention programs for all residential and commercial customers to include renewals, re-enrolls and contract enforcement, commercial contract negotiation and attrition tracking, exit fee negotiation.
- All facets of residential sales program, 3 40+ seat outbound call centers along with all applicable sales and contract tools employed therein.
- Oversight of Customer Service and Operations departments
- Coordination of collections of past due A/R and ETCs
- Review and approval of all red-lined Sales Agent Agreements, Contracts and Terms & Conditions
- Escalated customer service issues
- Escalated broker relations issues
- Key account support for top level brokers
- Coordination of all NYPSC/NJBPU customer complaint resolution
- Review of Broker/Agent conduct and contracts
- Responsible for all in house RFP responses and bids
- Responsible for application, retention and renewal process in new and emerging markets.
- Responsible for all regulatory documentation and compliance for northeast sales region.
- Solar division: Developed business model, business plan, 20 year projected financials (P&L, cash flow and balance sheets) together with fully interactive excel tool to accommodate all variables. Developed PPA contracts for residential and commercial/industrial applications as well as subcontractor installation contracts.

Exhibit B-4 "Disclosure of Liabilities and Investigations"

There are no existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigations or any other matters that could adversely impact Energy Advisory Solutions, 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"

Energy Advisory Solutions, LLC is a single member, privately owned LLC and does not produce Annual Reports.

Exhibit C-4 "Financial Arrangements"

N/A

Exhibit C-6 "Credit Rating"

N/A

Exhibit C-8 "Bankruptcy Information"

N/A

Exhibit C-9 "Merger Information"

N/A

Exhibit C-10 "Corporate Structure"

Applicant is a stand-alone entity with no affiliate or subsidiary companies.