

Section A: Application Information

A-1. Provider type:

☐ Power Broker
 ☐ Aggregator
 ☐ Retail Generation Provider
 ☒ Power Marketer

A-2. Applicant's legal name and contact information.

Legal Name: Spark Energy Gas, LLC
Phone: 877-547-7275
Extension (if applicable):
Website (if any): www.sparkenergy.com
Country: United States
Street: 12140 Wickchester Ln., Suite 100
City: Houston
Province/State: TX
Postal Code: 77079

A-3. Names and contact information under which the applicant will do business in Ohio

Provide the names and contact information the business entity will use for business in Ohio. This does not have to be an Ohio address and may be the same contact information given in A-2.

Name	Type	Address	Active?	Proof
Spark Energy Gas, LLC	Official Name	12140 Wickchester Ln., Suite 100 Houston, TX 77079	Yes	File

A-4. Names under which the applicant does business in North America

Provide all business names the applicant uses in North America, including the names provided in A-2 and A-3.

Name	Type	Address	Active?	Proof
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A-5. Contact person for regulatory matters

Martha Lopez
 12140 Wickchester Ln., Suite 100
 Houston, TX 77079
 US



regulatorymatters@sparkenergy.com
8322171909

A-6. Contact person for PUCO Staff use in investigating consumer complaints

April Lusk
12140 Wickchester Ln, Ste 100
Houston, TX 77079
US
regulatory@sparkenergy.com
7136002600

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

Phone: 877-547-7275	Extension (if applicable):	Country: United States
Fax:	Extension (if applicable):	Street: 12140 Wickchester Ln., Suite 100
Email: customercare@sparkenergy.com		City: Houston Province/State: TX
		Postal Code: 77079

A-8. Applicant's federal employer identification number

76-0668204

A-9. Applicant's form of ownership

Form of ownership: Limited Liability Company (LLC)

A-10. Identify current or proposed service areas

Identify each service area in which the applicant is currently providing service or intends to provide service and identify each customer class that the applicant is currently serving or intends to serve.

Service area selection

Columbia Gas of Ohio
Dominion Energy Ohio
Duke Energy Ohio
Vectren Energy Delivery of Ohio

Class of customer selection

Industrial
Residential
Small Commercial
Large Commercial

A-11. Start date

Indicate the approximate start date the applicant began/will begin offering services: 07-01-2009

A-12. Principal officers, directors, and partners

Please provide all contacts that should be listed as an officer, director or partner.

Name	Email	Title	Address
W. Keith Maxwell III	kmaxwell@sparkenergy.com	Chairman and Interim President and Chief Executive Officer	12140 Wickchester Ln., Suite 100 Houston, TX 77079 US
Kevin McMinn	kmcminn@sparkenergy.com	Chief Operating Officer	12140 Wickchester Ln., Suite 100 Houston, TX 77079 US
James G. Jones II	jjones@sparkenergy.com	Chief Financial Officer	12140 Wickchester Ln., Suite 100 Houston, TX 77079 US

A-13. Company history

Spark Energy Gas, LLC markets natural gas to residential, commercial and industrial customers in 14 different states across 31 utilities. Spark Energy Gas, LLC is headquartered in Houston, TX and has approximately 200 employees. Since 2002, Spark Energy Gas, LLC has been a provider of retail natural gas; in 2003, Spark Energy, LLC began offering retail electricity products.

A-14. Secretary of State

Secretary of State Link:

A-15. Proof of Ohio Employee and Office



Public Utilities Commission

Provide proof of an Ohio Office and Employee in accordance with Section 4929.22 of the Ohio Revised Code. List the designated Ohio employee's name, Ohio office address, telephone number and web site address

Employee Name: James Stapleton
8044 Montgomery Rd., Suite 700
Cincinnati, OH 45236
US
customercare@sparkenergy.com
5137922200

Section B: Applicant Managerial Capability and Experience

B-1. Jurisdiction of operations

List all jurisdictions in which the applicant or any affiliated interest of the applicant is certified, licensed, registered or otherwise authorized to provide retail natural gas service or retail/wholesale electric service as of the date of filing the application..

File Attached

B-2. Experience and plans

Describe the applicant's experience in providing the service(s) for which it is applying (e.g., number and type of customers served, utility service areas, amount of load, etc.). Include the 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 Sections 4928.10 and/or 4929.22 of the Ohio Revised Code.

File(s) attached

B-3. Disclosure of liabilities and investigations

For the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant, describe all existing, pending or past rulings, judgments, findings, contingent liabilities, revocation of authority, regulatory investigations, judicial actions, or other formal or informal notices of violations, or any other matter related to competitive services in Ohio or equivalent services in another jurisdiction..

File Attached



B-4. Disclosure of consumer protection violations

Has the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years?

Yes

File(s) attached

B-5. Disclosure of certification, denial, curtailment, suspension or revocation

Has the applicant, affiliate, or a predecessor of the applicant had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, revoked, or cancelled or been terminated or suspended from any of Ohio's Natural Gas or Electric Utility's Choice programs within the past two years?

No

Section C: Applicant Financial Capability and Experience

C-1. Financial reporting

Provide a current link to the most recent Form 10-K filed with the Securities and Exchange Commission (SEC) or upload the form. If the applicant does not have a Form 10-K, submit the parent company's Form 10-K. If neither the applicant nor its parent is required to file Form 10-K, state that the applicant is not required to make such filings with the SEC and provide an explanation as to why it is not required.

Financial Reports Link(s):

<https://www.sec.gov/Archives/edgar/data/1606268/000160626820000008/spke1231201910k.htm>

C-2. Financial statements



Public Utilities Commission

Provide copies of the applicant's two most recent years of audited financial statements, including a 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, provide 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 bank account numbers redacted**.

If the applicant is unable to meet the requirement for two years of financial statements, the Staff reviewer may request additional financial information.

Links to Financial Statement(s): 2018 – 10-K

<https://www.sec.gov/Archives/edgar/data/1606268/000160626819000008/spke1231201810k.htm>

2019 – 10-K

<https://www.sec.gov/Archives/edgar/data/1606268/000160626820000008/spke1231201910k.htm>

C-3. Forecasted financial statements

Provide two years of forecasted income statements **based solely on the applicant's anticipated business activities in the state of Ohio**.

Include the following information with the forecast: a list of assumptions used to generate the forecast; a statement indicating that the forecast is based solely on Ohio business activities only; and the name, address, email address, and telephone number of the preparer of the forecast.

The forecast may be in one of two acceptable formats: 1) an annual format that includes the current year and the two years succeeding the current year; or 2) a monthly format showing 24 consecutive months following the month of filing this application broken down into two 12-month periods with totals for revenues, expenses, and projected net incomes for both periods. Please show revenues, expenses, and net income (revenues minus total expenses) that is expected to be earned and incurred in **business activities only in the state of Ohio** for those periods.

If the applicant is filing for both an electric certificate and a natural gas certificate, please provide a separate and distinct forecast for revenues and expenses representing Ohio electric business activities in the application for the electric certificate and another forecast



Public Utilities Commission

representing Ohio natural gas business activities in the application for the natural gas certificate.

Preferred to file confidentially

C-4. Credit rating

Provide a credit opinion disclosing the applicant's credit rating as reported by at least one of the following ratings agencies: Moody's Investors Service, Standard & Poor's Financial Services, Fitch Ratings or the National Association of Insurance Commissioners. If the applicant does not have its own credit ratings, substitute the credit ratings of a parent or an affiliate organization and submit 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 'Not Rated'.

This does not apply

C-5. Credit report

Provide a copy of the applicant's credit report from Experian, Equifax, TransUnion, Dun and Bradstreet or a similar credit reporting organization. If the applicant is a newly formed entity with no credit report, then provide a personal credit report for the principal owner of the entity seeking certification. At a minimum, the credit report must show summary information and an overall credit score. **Bank/credit account numbers and highly sensitive identification information must be redacted.** If the applicant provides an acceptable credit rating(s) in response to C-4, then the applicant may select 'This does not apply' and provide a response in the box below stating that a credit rating(s) was provided in response to C-4.

File(s) attached

C-6. Bankruptcy information

Within the previous 24 months, have any of the following filed for reorganization, protection from creditors or any other form of bankruptcy?

- Applicant
- Parent company of the applicant
- Affiliate company that guarantees the financial obligations of the applicant
- Any owner or officer of the applicant

No



C-7. Merger information

Is the applicant currently involved in any dissolution, merger or acquisition activity, or otherwise participated in such activities within the previous 24 months?

No

C-8. Corporate structure

Provide a graphical depiction of the applicant's corporate structure. Do not provide an internal organizational chart. The graphical depiction should include all parent holding companies, subsidiaries and affiliates as well as 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 the applicant may respond by stating that it is a stand-alone entity with no affiliate or subsidiary companies.

File(s) attached

C-9. Financial arrangements

Provide copies of the applicant's financial arrangements to satisfy collateral requirements to conduct retail electric/natural gas business activities (e.g., parental guarantees, letters of credit, contractual arrangements, etc., as described below).

Renewal applicants may provide a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU's collateral requirements. The statement or letter must be on the utility's letterhead and dated within a 30-day period of the date the applicant files its renewal application.

First-time applicants or applicants whose certificate has expired must meet the requirements of C-9 in one of the following ways:

1. The applicant itself states that it is investment grade rated by Moody's Investors Service, Standard & Poor's Financial Services, or Fitch Ratings and provides evidence of rating from the rating agencies. If you provided a credit rating in C-4, reference the credit rating in the statement.
2. The applicant's parent company is investment grade rated (by Moody's, Standard & Poor's, or Fitch) and guarantees the financial obligations of the applicant to the LDU(s). Provide a copy of the most recent credit opinion from Moody's, Standard & Poor's or Fitch.
3. The applicant's parent company 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



Public Utilities Commission

parent company's financials and a copy of the parental guarantee must be included in the application if the applicant is relying on this option.

4. The applicant can provide evidence of posting a letter of credit with the LDU(s) listed as the beneficiary, in an amount sufficient to satisfy the collateral requirements of the LDU(s).

File(s) attached

Section D: Applicant Technical Capacity

D-1. Operations

Gas Marketers: Describe the operational nature of the applicant's business, specifying whether operations will include the contracting of natural gas purchases for retail sales, the nomination and scheduling of retail natural gas for delivery, and/or the provision of retail ancillary services, as well as other services used to supply natural gas to the natural gas company city gate for retail customers.

File(s) attached

D-2. Operations Expertise & Key Technical Personnel

Given the operational nature of the applicant's business, provide evidence of the applicant's experience and technical expertise in performing such operations. Include the names, titles, e-mail addresses, and background of key personnel involved in the operations of the applicant's business.

File(s) attached



Public Utilities
Commission

Application Attachments

Entity#: 1489505
Filing Type: FOREIGN LIMITED LIABILITY COMPANY
Original Filing Date: 09/15/2004
Location: --
Business Name: SPARK ENERGY GAS, LLC

Status: Active
Exp. Date: -

Agent/Registrant Information

CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY SUITE 125
COLUMBUS OH 43219
06/01/2017
Active

Filings

Filing Type	Date of Filing	Document ID
REGISTRATION OF FOREIGN LIMITED PARTNERSHIP	09/15/2004	200426502908
CORRECTION/FOREIGN LIMITED PARTNERSHIP	05/10/2007	200713100230
FOREIGN/DESIGNATED APPOINTMENT OF AGENT	01/19/2012	201202501288
CONVERSION WITHIN SOS RECORDS	07/24/2014	201420601889
REAL ESTATE TRUST/AGENT ADDRESS CHANGE	11/10/2016	201632602630
FOREIGN/DESIGNATED APPOINTMENT OF AGENT	06/01/2017	201715203366

Prior Business Names

Prior Business Name	Effective Date
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Prior Business Name	Effective Date
SPARK ENERGY GAS, LP	07/24/2014

Prior Business Names

Mon Jul 20 2020

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

I, Frank LaRose, Secretary of State of the State of Ohio, do hereby certify that this is a list of all records approved on this business entity and in the custody of the Secretary of State.



*Witness my hand and the seal of the
Secretary of State at Columbus,
Ohio this 20th of July, A.D. 2020*

Ohio Secretary of State

A handwritten signature in blue ink, reading "Frank LaRose".

Exhibit D-1: Operations

Spark Energy Gas, LLC markets natural gas by entering into contracts for retail sales, and provides gas supplies by contracting with and purchasing gas from wholesale suppliers. Spark also manages the nomination and scheduling process in house for all of its customers. Further details of the level of expertise of Spark Energy Gas, LLC employees and managers can be found in Exhibit D-2 “Operations Expertise and Key Technical Personnel”.

Exhibit B-2: Experience & Plans

Experience

Spark Energy Gas, LLC has been actively marketing gas since 2002. Currently, Spark has over 200 employees and is an active gas marketer that serves 14 states across 31 utilities. Spark Energy Gas, LLC and its affiliates serve Residential and Commercial customers supplying a total of 18 million Btu of retail natural gas. Service areas in each state for Spark Energy Gas, LLC and its affiliates can be found in *Exhibit B-1: Jurisdictions of Operation*.

Contracting with Customers/Providing Contracted Services

Spark Energy Gas, LLC provides competitively-priced gas products, while complying with all applicable laws and rules set forth by the Public Utilities Commission of Ohio, to customers in Ohio as it does in other states. All terms and conditions of the contract (pricing, terms, rights to terminate, etc.) are clearly disclosed to the customer.

Providing Billing Statements

Spark Energy Gas, LLC's billing services are provided through a third party, which manages the billing process for Spark's customers. Spark Energy Gas, LLC uses consolidated billing whenever possible unless the customer/product dictates that Spark Energy Gas, LLC bill for the energy charges separately. Any billing performed by Spark Energy Gas, LLC through a third party complies with the policies set forth by the PUCO.

Response to Customer Inquiries and Complaints

Spark Energy Gas, LLC commits to maintaining a fully trained staff of representatives to fulfill the needs of our customers. Spark utilizes a toll-free number specifically for Ohio customers and that number is provided on Spark's website as well as the contract. Spark Energy Gas, LLC is prepared to comply with all sections of Chapter 4901:1-21-08 concerning customer complaint handling. Spark Energy Gas, LLC is highly proficient in accepting customer inquiries and responding to complaints and does so meet similar requirements in other markets.

<u>State</u>	<u>Utility</u>	<u>Commodity</u>	<u>Product Type</u>	<u>Entity Name</u>
AZ	SW GAS AZ	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
CA	Sand Diego Gas & Electric	Gas	Residential / Small Comm	Spark Energy Gas, LLC
CA	Southern California Edison	Gas	Residential / Small Comm	Spark Energy Gas, LLC
CA	Pacific Gas & Electric	Gas	Residential / Small Comm	Spark Energy Gas, LLC
CO	XCEL	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
CT	United Illuminating	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
CT	United Illuminating	Electricity	Residential / Small Comm	Spark Energy, LLC
CT	United Illuminating	Electricity	Residential / Small Comm	HIKO Energy, LLC
CT	United Illuminating	Electricity	Residential / Small Comm	Verde Energy USA, Inc
CT	United Illuminating	Electricity	Residential / Small Comm	Perigee Energy, LLC
CT	Connecticut Light and Power	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
CT	Connecticut Light and Power	Electricity	Residential / Small Comm	Spark Energy, LLC
CT	Connecticut Light and Power	Electricity	Residential / Small Comm	HIKO Energy, LLC
CT	Connecticut Light and Power	Electricity	Residential / Small Comm	Verde Energy USA, Inc
CT	Connecticut Light and Power	Electricity	Residential / Small Comm	Perigee Energy, LLC
CT	Connecticut Natural Gas	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
CT	Southern Connecticut Gas	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
CT	YANKEE	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
DC	Potomac Electric Power Company	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
DC	Potomac Electric Power Company	Electricity	Residential / Small Comm	Verde Energy USA DC, LLC
DE	Delmarva Power	Electricity	Residential / Small Comm	Spark Energy, LLC
FL	FCG	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
FL	FPU	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
FL	TECO	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
IL	Commonwealth Edison	Electricity	Residential / Small Comm	Oasis Power, LLC
IL	Commonwealth Edison	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
IL	Commonwealth Edison	Electricity	Residential / Small Comm	Spark Energy, LLC
IL	Commonwealth Edison	Electricity	Residential / Small Comm	HIKO Energy, LLC
IL	Commonwealth Edison	Electricity	Residential / Small Comm	Verde Energy USA Illinois, LLC
IL	NICOR	Gas	Residential / Small Comm	Spark Energy Gas, LLC
IL	Northshore Gas	Gas	Residential / Small Comm	Spark Energy Gas, LLC
IL	People's Gas	Gas	Residential / Small Comm	Spark Energy Gas, LLC
IN	CITIZENS GAS	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
IN	NIPSCO	Gas	Residential / Small Comm	Spark Energy Gas, LLC
MA	Eversource / NSTAR	Electricity	Residential / Small Comm	Oasis Power, LLC
MA	Eversource / NSTAR	Electricity	Residential / Small Comm	Provider Power MASS, LLC
MA	Eversource / NSTAR	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
MA	Eversource / NSTAR	Electricity	Residential / Small Comm	Spark Energy, LLC
MA	Eversource / NSTAR	Electricity	Residential / Small Comm	Verde Energy USA Massachusetts, LLC
MA	National Grid Mass	Electricity	Residential / Small Comm	Oasis Power, LLC
MA	National Grid Mass	Electricity	Residential / Small Comm	Provider Power MASS, LLC
MA	National Grid Mass	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
MA	National Grid Mass	Electricity	Residential / Small Comm	Verde Energy USA Massachusetts, LLC
MA	Western Mass	Electricity	Residential / Small Comm	Provider Power MASS, LLC
MA	Western Mass	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
MA	Western Mass	Electricity	Residential / Small Comm	Verde Energy USA Massachusetts, LLC
MA	Eversource / NSTAR	Gas	Residential / Small Comm	Spark Energy Gas, LLC
MA	Nantucket Electric	Electricity	Residential / Small Comm	Provider Power MASS, LLC
MA	Nantucket Electric	Electricity	Residential / Small Comm	Verde Energy USA Massachusetts, LLC
MA	Columbia Gas of Massachusetts	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
MA	Boston	Gas	Residential / Small Comm	Spark Energy Gas, LLC
MA	Colonial	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
MA	Essex	Gas	Commercial / Small Comm	Spark Energy Gas, LLC

MA	Fitchburg Gas & Electric	Electricity	Residential / Small Comm	Provider Power MASS, LLC
MD	Baltimore Gas & Electric	Electricity	Residential / Small Comm	Oasis Power, LLC
MD	Baltimore Gas & Electric	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
MD	Baltimore Gas & Electric	Electricity	Residential / Small Comm	Spark Energy, LLC
MD	Baltimore Gas & Electric	Electricity	Residential / Small Comm	HIKO Energy, LLC
MD	Baltimore Gas & Electric	Gas	Residential / Small Comm	Oasis Power, LLC
MD	Baltimore Gas & Electric	Gas	Residential / Small Comm	Major Energy Services, LLC
MD	Baltimore Gas & Electric	Gas	Residential / Small Comm	Spark Energy Gas, LLC
MD	Baltimore Gas & Electric	Gas	Residential / Small Comm	HIKO Energy, LLC
MD	Potomac Electric Power Company	Electricity	Residential / Small Comm	Oasis Power, LLC
MD	Potomac Electric Power Company	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
MD	Potomac Edison	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
MD	Potomac Edison	Electricity	Residential / Small Comm	HIKO Energy, LLC
MD	Delmarva Power	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
ME	Central Maine Power	Electricity	Residential / Small Comm	Electricity Maine, LLC
ME	Emera Maine	Electricity	Residential / Small Comm	Electricity Maine, LLC
MI	Consumers	Gas	Residential / Small Comm	Spark Energy Gas, LLC
NH	Public Service New Hampshire	Electricity	Residential / Small Comm	Electricity N.H., LLC
NH	Liberty Utilities	Electricity	Residential / Small Comm	Electricity N.H., LLC
NH	New Hampshire Electric Co-op	Electricity	Residential / Small Comm	Electricity N.H., LLC
NH	Unitil Energy Systems	Electricity	Residential / Small Comm	Electricity N.H., LLC
NJ	Public Service Enterprise Group	Electricity	Residential / Small Comm	Oasis Power, LLC
NJ	Public Service Enterprise Group	Electricity	Residential / Small Comm	Respond Power, LLC
NJ	Public Service Enterprise Group	Electricity	Residential / Small Comm	CenStar Energy Corp.
NJ	Public Service Enterprise Group	Electricity	Residential / Small Comm	Spark Energy, LLC
NJ	Public Service Enterprise Group	Electricity	Residential / Small Comm	HIKO Energy, LLC
NJ	Public Service Enterprise Group	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
NJ	Public Service Enterprise Group	Gas	Residential / Small Comm	Oasis Power, LLC
NJ	Public Service Enterprise Group	Gas	Residential / Small Comm	Major Energy Services, LLC
NJ	Public Service Enterprise Group	Gas	Residential / Small Comm	CenStar Energy Corp.
NJ	Public Service Enterprise Group	Gas	Residential / Small Comm	Spark Energy Gas, LLC
NJ	Public Service Enterprise Group	Gas	Residential / Small Comm	HIKO Energy, LLC
NJ	Public Service Enterprise Group	Gas	Residential / Small Comm	Verde Energy USA, Inc
NJ	Atlantic City Electric	Electricity	Residential / Small Comm	Respond Power, LLC
NJ	Atlantic City Electric	Electricity	Residential / Small Comm	HIKO Energy, LLC
NJ	Atlantic City Electric	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
NJ	JCP&L	Electricity	Residential / Small Comm	Respond Power, LLC
NJ	JCP&L	Electricity	Residential / Small Comm	HIKO Energy, LLC
NJ	JCP&L	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
NJ	New Jersey Natural Gas	Gas	Residential / Small Comm	Major Energy Services, LLC
NJ	New Jersey Natural Gas	Gas	Residential / Small Comm	HIKO Energy, LLC
NJ	New Jersey Natural Gas	Gas	Residential / Small Comm	Verde Energy USA, Inc
NJ	South Jersey Gas Company	Gas	Residential / Small Comm	Major Energy Services, LLC
NJ	South Jersey Gas Company	Gas	Residential / Small Comm	HIKO Energy, LLC
NJ	South Jersey Gas Company	Gas	Residential / Small Comm	Verde Energy USA, Inc
NV	SW GAS NV	Gas	Commercial / Small Comm	Spark Energy Gas, LLC
NY	Consolidated Edison	Electricity	Residential / Small Comm	Oasis Power, LLC

NY	Consolidated Edison	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
NY	Consolidated Edison	Electricity	Residential / Small Comm	CenStar Energy Corp.
NY	Consolidated Edison	Electricity	Residential / Small Comm	Spark Energy, LLC
NY	Consolidated Edison	Electricity	Residential / Small Comm	HIKO Energy, LLC
NY	Consolidated Edison	Electricity	Residential / Small Comm	Verde Energy USA New York, LLC
NY	Consolidated Edison	Gas	Residential / Small Comm	Oasis Power, LLC
NY	Consolidated Edison	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	Consolidated Edison	Gas	Residential / Small Comm	CenStar Energy Corp.
NY	Consolidated Edison	Gas	Residential / Small Comm	Spark Energy Gas, LLC
NY	Consolidated Edison	Gas	Residential / Small Comm	HIKO Energy, LLC
NY	KEYSPAN NY	Gas	Residential / Small Comm	Oasis Power, LLC
NY	KEYSPAN NY	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	KEYSPAN NY	Gas	Residential / Small Comm	CenStar Energy Corp.
NY	KEYSPAN NY	Gas	Residential / Small Comm	Spark Energy Gas, LLC
NY	KEYSPAN NY	Gas	Residential / Small Comm	HIKO Energy, LLC
NY	NGRID - NIMO	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
NY	NGRID - NIMO	Electricity	Residential / Small Comm	Spark Energy, LLC
NY	NGRID - NIMO	Electricity	Residential / Small Comm	HIKO Energy, LLC
NY	NGRID - NIMO	Electricity	Residential / Small Comm	Verde Energy USA New York, LLC
NY	New York State Electric & Gas	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
NY	New York State Electric & Gas	Electricity	Residential / Small Comm	CenStar Energy Corp.
NY	New York State Electric & Gas	Electricity	Residential / Small Comm	HIKO Energy, LLC
NY	New York State Electric & Gas	Electricity	Residential / Small Comm	Verde Energy USA New York, LLC
NY	Rochester Gas & Electric	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
NY	Rochester Gas & Electric	Electricity	Residential / Small Comm	CenStar Energy Corp.
NY	Rochester Gas & Electric	Electricity	Residential / Small Comm	HIKO Energy, LLC
NY	Rochester Gas & Electric	Electricity	Residential / Small Comm	Verde Energy USA New York, LLC
NY	KEYSPAN LI	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	KEYSPAN LI	Gas	Residential / Small Comm	CenStar Energy Corp.
NY	KEYSPAN LI	Gas	Residential / Small Comm	Spark Energy Gas, LLC
NY	KEYSPAN LI	Gas	Residential / Small Comm	HIKO Energy, LLC
NY	Central Hudson	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
NY	Central Hudson	Electricity	Residential / Small Comm	HIKO Energy, LLC
NY	Central Hudson	Electricity	Residential / Small Comm	Verde Energy USA New York, LLC
NY	NGRID - NIMO	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	NGRID - NIMO	Gas	Residential / Small Comm	Spark Energy Gas, LLC
NY	NGRID - NIMO	Gas	Residential / Small Comm	Verde Energy USA New York, LLC
NY	New York State Electric & Gas	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	New York State Electric & Gas	Gas	Residential / Small Comm	CenStar Energy Corp.
NY	New York State Electric & Gas	Gas	Residential / Small Comm	HIKO Energy, LLC
NY	Orange & Rockland	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
NY	Orange & Rockland	Electricity	Residential / Small Comm	CenStar Energy Corp.
NY	Orange & Rockland	Electricity	Residential / Small Comm	HIKO Energy, LLC
NY	Orange & Rockland	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	Orange & Rockland	Gas	Residential / Small Comm	CenStar Energy Corp.
NY	Orange & Rockland	Gas	Residential / Small Comm	HIKO Energy, LLC
NY	Rochester Gas & Electric	Gas	Residential / Small Comm	Major Energy Services, LLC

NY	Rochester Gas & Electric	Gas	Residential / Small Comm	CenStar Energy Corp.
NY	Rochester Gas & Electric	Gas	Residential / Small Comm	HIKO Energy, LLC
NY	Central Hudson	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	Central Hudson	Gas	Residential / Small Comm	HIKO Energy, LLC
NY	National Fuel	Gas	Residential / Small Comm	Major Energy Services, LLC
NY	National Fuel	Gas	Residential / Small Comm	HIKO Energy, LLC
OH	Duke	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
OH	Duke	Electricity	Residential / Small Comm	CenStar Energy Corp.
OH	Duke	Electricity	Residential / Small Comm	HIKO Energy, LLC
OH	Duke	Electricity	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Duke	Gas	Residential / Small Comm	Major Energy Services, LLC
OH	Duke	Gas	Residential / Small Comm	CenStar Energy Corp.
OH	Duke	Gas	Residential / Small Comm	HIKO Energy, LLC
OH	Duke	Gas	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Cleveland Illuminating	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
OH	Cleveland Illuminating	Electricity	Residential / Small Comm	CenStar Energy Corp.
OH	Cleveland Illuminating	Electricity	Residential / Small Comm	HIKO Energy, LLC
OH	Cleveland Illuminating	Electricity	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Ohio Edison	Electricity	Residential / Small Comm	CenStar Energy Corp.
OH	Ohio Edison	Electricity	Residential / Small Comm	HIKO Energy, LLC
OH	Ohio Edison	Electricity	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Toledo Edison	Electricity	Residential / Small Comm	CenStar Energy Corp.
OH	Toledo Edison	Electricity	Residential / Small Comm	HIKO Energy, LLC
OH	Toledo Edison	Electricity	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Dominion East Ohio	Gas	Residential / Small Comm	CenStar Energy Corp.
OH	Dominion East Ohio	Gas	Residential / Small Comm	Spark Energy Gas, LLC
OH	Dominion East Ohio	Gas	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Dayton Light and Power	Electricity	Residential / Small Comm	Major Energy Electric Services, LLC
OH	Dayton Light and Power	Electricity	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Columbia Gas of Ohio	Gas	Residential / Small Comm	Spark Energy Gas, LLC
OH	Columbia Gas of Ohio	Gas	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Columbus Southern Power Ohio	Electricity	Residential / Small Comm	CenStar Energy Corp.
OH	Columbus Southern Power Ohio	Electricity	Residential / Small Comm	Verde Energy USA Ohio, LLC
OH	Ohio Power	Electricity	Residential / Small Comm	CenStar Energy Corp.
OH	Ohio Power	Electricity	Residential / Small Comm	Verde Energy USA Ohio, LLC
PA	Philadelphia Electric Company	Electricity	Residential / Small Comm	Oasis Power, LLC
PA	Philadelphia Electric Company	Electricity	Residential / Small Comm	Respond Power, LLC
PA	Philadelphia Electric Company	Electricity	Residential / Small Comm	Spark Energy, LLC
PA	Philadelphia Electric Company	Electricity	Residential / Small Comm	HIKO Energy, LLC
PA	Philadelphia Electric Company	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
PA	Pennsylvania Power & Light	Electricity	Residential / Small Comm	Oasis Power, LLC
PA	Pennsylvania Power & Light	Electricity	Residential / Small Comm	Respond Power, LLC
PA	Pennsylvania Power & Light	Electricity	Residential / Small Comm	Spark Energy, LLC
PA	Pennsylvania Power & Light	Electricity	Residential / Small Comm	HIKO Energy, LLC
PA	Pennsylvania Power & Light	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
PA	Philadelphia Electric Company	Gas	Residential / Small Comm	Oasis Power, LLC
PA	Philadelphia Electric Company	Gas	Residential / Small Comm	Major Energy Services, LLC

PA	Philadelphia Electric Company	Gas	Residential / Small Comm	HIKO Energy, LLC
PA	Philadelphia Electric Company	Gas	Residential / Small Comm	Verde Energy USA Pennsylvania, LLC
PA	West Penn Power	Electricity	Residential / Small Comm	Oasis Power, LLC
PA	West Penn Power	Electricity	Residential / Small Comm	Respond Power, LLC
PA	West Penn Power	Electricity	Residential / Small Comm	HIKO Energy, LLC
PA	West Penn Power	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
PA	Duquesne Light	Electricity	Residential / Small Comm	Oasis Power, LLC
PA	Duquesne Light	Electricity	Residential / Small Comm	Respond Power, LLC
PA	Duquesne Light	Electricity	Residential / Small Comm	HIKO Energy, LLC
PA	Duquesne Light	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
PA	Columbia Gas of Pennsylvania	Gas	Residential / Small Comm	Oasis Power, LLC
PA	Columbia Gas of Pennsylvania	Gas	Residential / Small Comm	Major Energy Services, LLC
PA	Columbia Gas of Pennsylvania	Gas	Residential / Small Comm	Verde Energy USA Pennsylvania, LLC
PA	Penelec	Electricity	Residential / Small Comm	Respond Power, LLC
PA	Penelec	Electricity	Residential / Small Comm	HIKO Energy, LLC
PA	Penelec	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
PA	UGI Utilities	Gas	Residential / Small Comm	Major Energy Services, LLC
PA	UGI Utilities	Gas	Residential / Small Comm	HIKO Energy, LLC
PA	UGI Utilities	Gas	Residential / Small Comm	Verde Energy USA Pennsylvania, LLC
PA	Met-Ed	Electricity	Residential / Small Comm	Respond Power, LLC
PA	Met-Ed	Electricity	Residential / Small Comm	HIKO Energy, LLC
PA	Met-Ed	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
PA	UGI Utilities - Penn	Gas	Residential / Small Comm	HIKO Energy, LLC
PA	UGI Utilities - Penn	Gas	Residential / Small Comm	Verde Energy USA Pennsylvania, LLC
PA	Peoples Gas	Gas	Residential / Small Comm	Oasis Power, LLC
PA	Peoples Gas	Gas	Residential / Small Comm	Verde Energy USA Pennsylvania, LLC
PA	Penn Power	Electricity	Residential / Small Comm	Respond Power, LLC
PA	Penn Power	Electricity	Residential / Small Comm	Verde Energy USA, Inc.
PA	UGI Central Penn Natural Gas	Gas	Residential / Small Comm	Verde Energy USA Pennsylvania, LLC
PA	National Fuel	Gas	Residential / Small Comm	Major Energy Services, LLC
TX	AEP Texas Central	Electricity	Residential / Small Comm	Spark Energy, LLC
TX	AEP Texas Central	Electricity	Residential / Small Comm	Verde Energy USA Texas, LLC
TX	AEP Texas North	Electricity	Residential / Small Comm	Spark Energy, LLC
TX	AEP Texas North	Electricity	Residential / Small Comm	Verde Energy USA Texas, LLC
TX	Centerpoint	Electricity	Residential / Small Comm	Spark Energy, LLC
TX	Centerpoint	Electricity	Residential / Small Comm	Verde Energy USA Texas, LLC
TX	ONCOR	Electricity	Residential / Small Comm	Spark Energy, LLC
TX	ONCOR	Electricity	Residential / Small Comm	Verde Energy USA Texas, LLC
TX	Texas New Mexico Power	Electricity	Residential / Small Comm	Spark Energy, LLC
TX	Texas New Mexico Power	Electricity	Residential / Small Comm	Verde Energy USA Texas, LLC

Exhibit D-2: Operations Expertise and Key Technical Personnel

W. KEITH MAXWELL III – Interim President and Chief Executive Officer
12140 Wickchester Ln., Suite 100
Houston, TX 77079
Phone: (713) 977-5641

W. Keith Maxwell serves as Interim President and Chief Executive Officer of Spark Energy, which he was appointed to in March 2020. Prior to founding the predecessor of Spark Energy in 1999, Mr. Maxwell was a founding partner in Wickford Energy, an oil and natural gas services company which was sold to Black Hills Utilities in 1997.

Prior to Wickford Energy, Mr. Maxwell was a partner in Polaris Pipeline, a natural gas producer services and midstream company that sold to TECO Pipeline in 1994. In 2010, Mr. Maxwell was named Ernst & Young Entrepreneur of the Year in the Energy, Chemicals and Mining category. A native of Houston, Texas, Mr. Maxwell earned a Bachelor's Degree in Economics from the University of Texas at Austin in 1987.

Mr. Maxwell has several philanthropic interests, including the Special Olympics, Child Advocates, Salvation Army, Star of Hope and Helping a Hero. We believe that Mr. Maxwell's extensive energy industry background, leadership experience, and strategic planning and oversight brings an important skill set to Spark Energy.

KEVIN McMINN –Chief Operating Officer
12140 Wickchester Ln., Suite 100
Houston, TX 77079
Phone: (832) 217-1907

Kevin McMinn is Chief Operating Officer. Kevin brings with him 20 years of experience in wholesale and retail energy markets operations and has provided consulting services to Entergy, Shell Energy North America and Reliant/NRG, among others.

Some previous positions Mr. McMinn has held include Chief Operating Officer at USG&E, a commercial and residential energy services, Executive Vice President & Board Member at Energy Services Providers, Inc. (ESPI), Founder & Director of Lucid Solutions, and EVP role at Energy Services Providers and culminating as the Chief Sales Officer of Crius Energy.

Mr. McMinn has insights and thoughtful approaches to the evolving retail energy markets which has established him as a sought-after leader among peers.

JAMES G. JONES –*Chief Financial Officer*
12140 Wickchester Ln., Suite 100
Houston, TX 77079
Phone: (832) 217-1860

James G. Jones was appointed Chief Financial Officer in June 2019. Immediately prior to his appointment as CFO, Mr. Jones served on the Board as an Independent Director and the Chair of Audit and Special Committees since 2014. Mr. Jones oversees Spark's accounting, tax, SEC reporting, treasury, financial planning and analysis, and investor relations functions. He is also the Chief Risk Officer.

Mr. Jones was a partner at Weaver Tidwell LLP, a regional certified public accounting firm. Prior to joining Weaver Tidwell, LLP, Mr. Jones was a partner in the Houston office of Padgett Stratemann & Co. from May 2014 to August 2016 when Padgett was acquired by RSM. Prior to joining Padgett Stratemann & Co., Mr. Jones was a partner at Ernst & Young LLP where he worked from October 1998 to March 2014. Mr. Jones holds a Doctor of Jurisprudence from Louisiana State University and a Bachelor of Science in Accounting from the University of Louisiana at Monroe.

Mr. Jones was appointed Chief Financial Officer because of his extensive tax and financial background, as well as his management expertise.

Trading Personnel:

Greg Stuart – *Director, Natural Gas Operations*
12140 Wickchester Ln., Suite 100
Houston, TX 77079
Phone: 832-200-3739

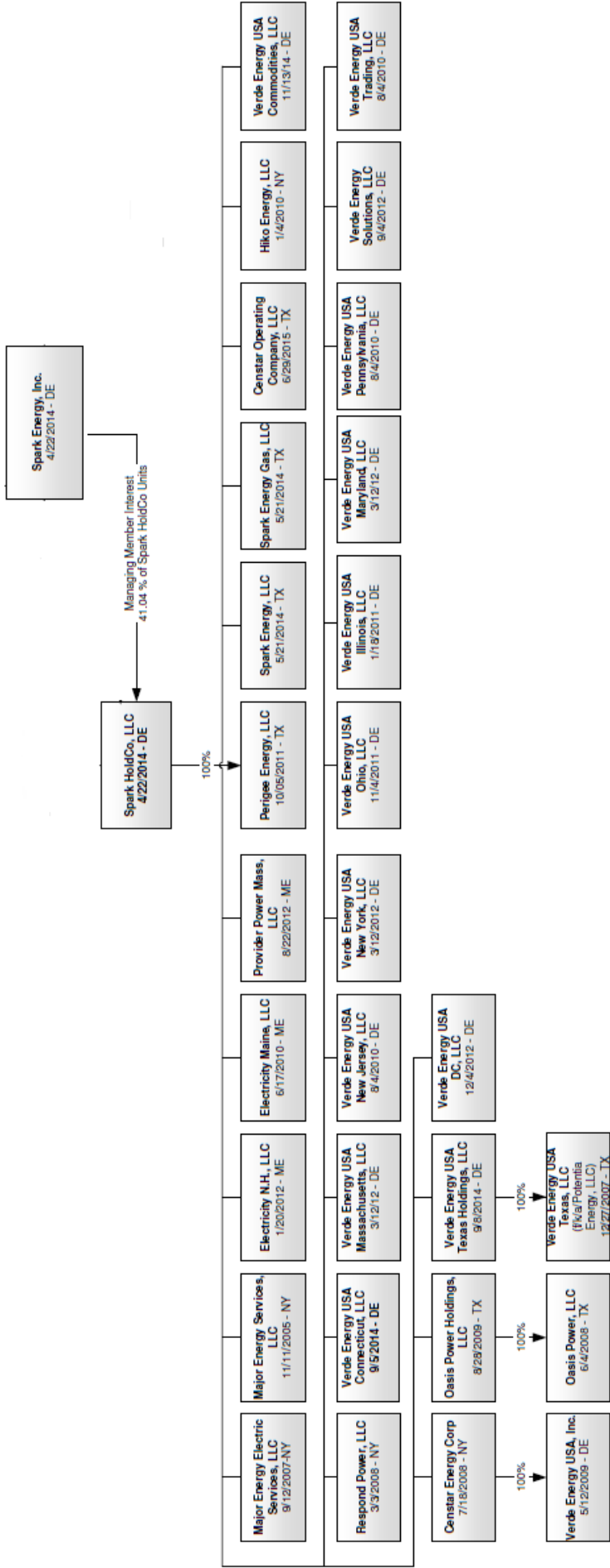
10+ years of industry experience; entered the industry through retail power/natural gas pricing and structuring where granular knowledge of Natural Gas and ISO's markets was attained and used in power/natural gas price modeling and margin analytics.

Joe Bruskotter – *Director, Northeast Region*
12140 Wickchester Ln., Suite 100
Houston, TX 77079
Phone: 832-200-3791

18+ years of industry experience; began as a scheduler and trader and quickly moved to managing the cash/real-time market activities prior to overseeing all of the Companies cash month operations.

Michael Lopez – *Manager, Gas Supply*
12140 Wickchester Ln., Suite 100
Houston, TX 77079
Phone: 832-200-3741

11+ years of industry experience; started in financial planning of wholesale power/natural gas markets. Later moved into wholesale power/natural gas trading in cash markets before arriving at Spark to manage the entirety of company's cash and short term market power/natural gas position.



LIVE REPORT

Currency: Shown in USD unless otherwise indicated 

SPARK ENERGY GAS, LLC

Trade Names: (SUBSIDIARY OF SPARK ENERGY, INC., HOUSTON, TX),SPARK ENERGY

ACTIVE

SINGLE (SUBSIDIARY)

D-U-N-S 01-620-0607

Number:

Company: SPARK ENERGY GAS, LLC

D&B Address

Address: 12140 WICKCHESTER LN STE 100

HOUSTON, TX, US - 77079

Location SINGLE (SUBSIDIARY)

Type:

Phone: 877-547-7275

Fax:

Web: www.urslp.com

Endorsement:

Fuelcocredit@nufuelco.com

Company Summary

SCORE BAR

Financial Stress Score Class

↑

3

Moderate Risk of severe financial stress

Commercial Credit Score Class

↑

2

Low to Moderate Risk of severe payment delinquency

High Credit - Average

525.00

Average High Credit for payment experiences reported to D&B.

PAYDEX®

↑

42

Paying 54 days past due

D&B Viability Rating

4

6

B

Z

View More Details

Bankruptcy Found

N

D&B Rating

1R3

1R indicates 10 or more Employees, Credit appraisal of 3 is fair

DETAILED TRADE RISK INSIGHT™

3 months

from Nov-19 to Jan-20

Days Beyond Terms Past 3 months: 0 Days

Days Beyond Terms Past 3 months :

Low Risk:0 ; High Risk:120+

Dollar-weighted average of 2 payment experiences reported from 2 companies.

PAYDEX® TREND CHART

CORPORATE LINKAGE

This is a Single (Subsidiary) location	SPARK ENERGY GAS,
	LLC
	Houston, TX
	D-U-N-S® NUMBER: 01-620-0607
Parent Company	SPARK ENERGY, INC.
	Texas
	D-U-N-S® NUMBER:
	07-941-7907

PUBLIC FILINGS

The following data includes both open and closed filings found in D&B's database on this company.

Record Type	Number of Records	Most Recent Filing Date
Bankruptcies	0	---
Judgments	0	---
Liens	1	10/17/2019
Suits	0	---
UCCs	18	01/28/2019

The public record items contained herein may have been paid, terminated, vacated or released prior to today's date.

FINANCIAL STRESS SCORE CLASS

Financial Stress Score Class : 3

Low Risk:1 ; High Risk:5

D&B VIABILITY RATING SUMMARY

<div>Viability Score</div> <div>Viability Score : 4</div> <div>Low Risk:1 ; High Risk:9</div>	<div>Portfolio Comparison</div> <div>Portfolio Comparison : 6</div> <div>Low Risk:1 ; High Risk:9</div>
<div>Data Depth Indicator</div> <div>Data Depth Indicator : B</div> <div>Predictive:A ; Descriptive:G</div>	<div>Company Profile:</div> <div>Z</div> <div>SUBSIDIARY</div>

D&B COMPANY OVERVIEW

This is a single (subsidiary) location

<div>Chief Executive</div> <div>WILLIAM KEITH MAXWELL III, CEO</div>	<div>Age (Year Started)</div> <div>19 years (2001)</div>	<div>Employees</div> <div>100 (Here)</div>
<div>History Status</div> <div>CLEAR</div>	<div>Financing</div> <div>SECURED</div>	<div>SIC</div> <div>4911</div>
<div>Line of business</div> <div>Electric services</div>	<div>NAICS</div> <div>221118</div>	

COMMERCIAL CREDIT SCORE CLASS

Commercial Credit Score Class : 2

Low Risk:1 ; High Risk:5

Detailed Trade Risk Insight provides detailed updates on over 1.5 billion commercial trade experiences collected from more than 260 million unique supplier/purchaser relationships.

DAYS BEYOND TERMS - PAST 3 & 12 MONTHS

<div>3 months from Nov-19 to Jan-20</div> <div>Days Beyond Terms : 0 Days</div> <div>Days Beyond Terms : High Risk:120+ ; Low Risk:0</div> <div>Dollar-weighted average of 2 payment experiences reported from 2 companies.</div>	<div>12 months from Feb-19 to Jan-20</div> <div>Days Beyond Terms : 27</div> <div>Days Beyond Terms : 27 High Risk:120+ ; Low Risk:0</div> <div>Dollar-weighted average of 2 payment experiences reported from 2 companies.</div>
---	---

DEROGATORY EVENTS LAST 12 MONTHS FROM JAN-19 TO DEC-19

No Derogatory trade Event has been reported on this company for the past 13 Months
--

TOTAL AMOUNT CURRENT AND PAST DUE - 12 MONTH TREND FROM JAN-19 TO DEC-19

Status	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	
Total	40	465	1,020	452	452	452	452	937	752	452	40	40	
Current	40	465	595	40	40	40	40	525	340	40	40	40	
1-30 Days Past Due	0	0	425	412	412	412	0	0	0	0	0	0	
31-60 Days Past Due	0	0	0	0	0	0	0	0	0	0	0	0	
61-90 Days Past Due	0	0	0	0	0	0	412	0	0	0	0	0	

91+	0	0	0	0	0	0	0	412	412	412	0	0
Days												
Past												
Due												

Corporate Linkage

Increase your understanding of the links and risks between your customers and suppliers with D&B's Interactive Global Family Tree

PARENT

Company	City , State	D-U-N-S® NUMBER
SPARK ENERGY, INC.	HOUSTON , Texas	07-941-7907

AFFILIATES (DOMESTIC)

Company	City , State	D-U-N-S® NUMBER
MAJOR ENERGY SERVICES LLC	ORANGEBURG , New York	62-399-0764
SPARK ENERGY, LLC	HOUSTON , Texas	03-759-7437
PERIGEE ENERGY, LLC	KATY , Texas	07-850-8197
SPARK HOLDCO, LLC	HOUSTON , Texas	07-982-9778
OASIS POWER, LLC	HOUSTON , Texas	83-076-7682
CENSTAR ENERGY CORP	NEW ROCHELLE , New York	83-035-7377
RESPOND POWER LLC	ORANGEBURG , New York	82-746-8013
VERDE ENERGY SOLUTIONS, LLC	ALAMO HEIGHTS , Texas	05-986-9993
HIKO ENERGY LLC	ORANGEBURG , New York	83-326-7888

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Predictive Scores

D&B VIABILITY RATING SUMMARY

The D&B Viability Rating uses D&B's proprietary analytics to compare the most predictive business risk indicators and deliver a highly reliable assessment of the probability that a company will go out of business, become dormant/inactive, or file for bankruptcy/insolvency within the next 12 months. The D&B Viability Rating is made up of 4 components:

Viability Score

Compared to All US Businesses within the D&B Database:

- Level of Risk: **Low Risk**
- Businesses ranked **4** have a probability of becoming no longer viable: **5 %**
- Percentage of businesses ranked **4**: **14 %**
- Across all US businesses, the average probability of becoming no longer viable: **14 %**

Portfolio Comparison

Compared to All US Businesses within the same MODEL SEGMENT:

- Model Segment : **Established Trade Payments**
- Level of Risk: **Moderate Risk**
- Businesses ranked **6** within this model segment have a probability of becoming no longer viable: **5 %**
- Percentage of businesses ranked **6** with this model segment: **9 %**
- Within this model segment, the average probability of becoming no longer viable: **5 %**

Data Depth Indicator

Data Depth Indicator:

- ✓ Rich Firmographics
- ✓ Extensive Commercial Trading Activity
- ✓ Basic Financial Attributes

Greater data depth can increase the precision of the D&B Viability Rating assessment.

To help improve the current data depth of this company, you can ask D&B to make a personalized request to this company on your behalf to obtain its latest financial information. To make the request, click the link below. Note, the company must be saved to a folder before the request can be made.

Request Financial Statements

Reference the FINANCIALS tab for this company to monitor the status of your request.

Company Profile:

Company Profile Details:

- Financial Data:
- Trade Payments:
- Company Size:
- Years in Business:

Z

Subsidiary

CREDIT CAPACITY SUMMARY

This credit rating was assigned because of D&B's assessment of the company's creditworthiness. For more information, see the

D&B Rating Key

D&B Rating: 1R3

Number of employees: 1R
indicates 10 or more employees

Composite credit appraisal: 3 is
fair

The 1R and 2R ratings categories reflect company size based on the total number of employees for the business. They are assigned to business files that do not contain a current financial statement. In 1R and 2R Ratings, the 2, 3, or 4 creditworthiness indicator is based on analysis by D&B of public filings, trade payments, business age and other important factors. 2 is the highest Composite Credit Appraisal a company not supplying D&B with current financial information can receive.

Number of Employees Total: 100

Payment Activity	(based on 16 experiences)
Average High Credit:	\$525
Highest Credit:	\$1,000
Total Highest Credit:	\$2,300

Below is an overview of the company's rating history since 01-29-2005.

D&B Rating	Date Applied
1R3	08/29/2016
--	10/01/2015
1R3	10/03/2013
1R2	11/05/2012
4A2	01/19/2011
1R3	12/15/2009
3A4	09/11/2008
4A2	11/28/2007
1R2	02/15/2005
--	01/29/2005

D&B CREDIT LIMIT RECOMMENDATION

Conservative credit Limit: 200,000 Aggressive credit Limit: 300,000 Risk category for this business: LOW	Risk category for this business: : LOW
--	--

The Credit Limit Recommendation (CLR) is intended to serve as a directional benchmark for all businesses within the same line of business or industry, and is not calculated based on any individual business. Thus, the CLR is intended to help guide the credit limit decision, and must be balanced in combination with other elements which reflect the individual company's size, financial strength, payment history, and credit worthiness, all of which can be derived from D&B reports.

Risk is assessed using D&Bs scoring methodology and is one factor used to create the recommended limits. See Help for details.

FINANCIAL STRESS CLASS SUMMARY

The Financial Stress Score predicts the likelihood of a firm ceasing business without paying all creditors in full, or reorganization or obtaining relief from creditors under state/federal law over the next 12 months. Scores were calculated using a statistically valid model derived from D&B's extensive data files.

The Financial Stress Class of 3 for this company shows that firms with this class had a failure rate of 0.24% (24 per 10,000), which is lower than the average of businesses in D & B's database

Financial Stress Class :

Financial Stress Class : 3

Low Risk:1 ; High Risk:5

Moderately lower than average risk of severe financial stress, such as a bankruptcy or going out of business with unpaid debt, over the next 12 months.

Probability of Failure:

- Risk of Severe Financial Stress for Businesses with this Class: **0.24%** (24 per 10,000)
- Financial Stress National Percentile : **34** (Highest Risk: 1; Lowest Risk: 100)
- Financial Stress Score : **1450** (Highest Risk: 1,001; Lowest Risk: 1,875)
- Average Risk of Severe Financial Stress for Businesses in D&B database: **0.48%** (48 per 10,000)

The Financial Stress Class of this business is based on the following factors:

- Composite credit appraisal is rated fair.
- UCC Filings reported.
- Evidence of open liens
- Low proportion of satisfactory payment experiences to total payment experiences.
- Unstable Paydex over last 12 months.
- High proportion of past due balances to total amount owing.

Financial Stress Percentile Trend:

- Notes:**
- The Financial Stress Class indicates that this firm shares some of the same business and financial characteristics of other companies with this classification. It does not mean the firm will necessarily experience financial stress.
 - The Probability of Failure shows the percentage of firms in a given Class that discontinued operations over the past year with loss to creditors. The Probability of Failure - National Average represents the national failure rate and is provided for comparative purposes.
 - The Financial Stress National Percentile reflects the relative ranking of a company among all scorable companies in D&B's file.
 - The Financial Stress Score offers a more precise measure of the level of risk than the Class and Percentile. It is especially helpful to customers using a scorecard approach to determining overall business performance.

Norms	National %
This Business	34
Region: WEST SOUTH CENTRAL	44
Industry: INFRASTRUCTURE	43
Employee range: 100-499	75
Years in Business: 11-25	68

- This Business has a Financial Stress Percentile that shows:**
- Higher risk than other companies in the same region.
 - Higher risk than other companies in the same industry.
 - Higher risk than other companies in the same employee size range.
 - Higher risk than other companies with a comparable number of years in business.

CREDIT SCORE SUMMARY

The Commercial Credit Score (CCS) predicts the likelihood of a business paying its bills in a severely delinquent manner (91 days or more past terms).

The Credit Score class of 2 for this company shows that 2.5% of firms with this class paid one or more bills severely delinquent, which is lower than the average of businesses in D & B's database.

Credit Score Class :

Credit Score Class : 2

Low Risk:1 ; High Risk:5

Moderate risk of severe payment delinquency over next 12 months.

Incidence of Delinquent Payment

- Among Companies with this Classification: **2.50%**
- Average compared to businesses in D&B's database: **10.20%**
- Credit Score Percentile : **72** (Highest Risk: 1; Lowest Risk: 100)
- Credit Score : **532** (Highest Risk: 101; Lowest Risk: 670)

The Credit Score Class of this business is based on the following factors:

- Evidence of negative trade
- Proportion of satisfactory balances to total payment balances reported
- Proportion of slow payment experiences to total number of payment experiences reported

Credit Score Class Percentile Trend:

Notes

- The Commercial Credit Score Risk Class indicates that this firm shares some of the same business and financial characteristics of other companies with this classification. It does not mean the firm will necessarily experience severe delinquency.
- The Incidence of Delinquent Payment is the percentage of companies with this classification that were reported 91 days past due or more by creditors. The calculation of this value is based on D&B's trade payment database.
- The Commercial Credit Score percentile reflects the relative ranking of a firm among all scorable companies in D&B's file.
- The Commercial Credit Score offers a more precise measure of the level of risk than the Risk Class and Percentile. It is especially helpful to customers using a scorecard approach to determining overall business performance.

Norms	National %
This Business	72
Region: WEST SOUTH CENTRAL	52
Industry: INFRASTRUCTURE	32
Employee range: 100-499	89
Years in Business: 11-25	66

This business has a Credit Score Percentile that shows:

- Lower risk than other companies in the same region.
- Lower risk than other companies in the same industry.
- Higher risk than other companies in the same employee size range.
- Lower risk than other companies with a comparable number of years in business.

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Trade Payments

D&B PAYDEX®			
The D&B PAYDEX is a unique, weighted indicator of payment performance based on payment experiences as reported to D&B by trade references. Learn more about the D&B PAYDEX			
Timeliness of historical payments for this company.			
Current PAYDEX 42 Equal to 54 days beyond terms (Pays more slowly than the average for its industry of 9 days beyond terms) Industry Median 74 Equal to 9 days beyond terms Payment Trend Unchanged Compared to payments three months ago Indications of slowness can be the result of dispute over merchandise, skipped invoices etc. Accounts are sometimes placed for collection even though the existence or amount of the debt is disputed.	Payments Within Terms 45%		Average High Credit \$525
	Total payment Experiences in D&Bs File (HQ)	16	Largest High Credit \$1,000
	Trade Experiences with Slow or Negative Payments(%)	6.25%	Highest Now Owing \$50
	Total Placed For Collection	0	Highest Past Due \$0

D&B has not received a sufficient sample of payment experiences to establish a PAYDEX score.D&B receives nearly 400 million payment experiences each year. We enter these new and updated experiences into D&B Reports as this information is received. At this time, none of those experiences relate to this company.

D&B PAYDEX	3-MONTH D&B PAYDEX
<div>D&B PAYDEX : 42 </div> <div>Low Risk (100) ; High Risk (1)</div> <div>When weighted by amount, payments to suppliers average 54 days beyond terms</div> <div><div><input type="checkbox"/> High risk of late payment (Average 30 to 120 days beyond terms)</div><div><input type="checkbox"/> Medium risk of late payment (Average 30 days or less beyond terms)</div><div><input type="checkbox"/> Low risk of late payment (Average prompt to 30+ days sooner)</div></div>	<div>3-Month D&B PAYDEX : 42 </div> <div>Low Risk (100) ; High Risk (1)</div> <div>Based on payments collected over last 3 months. When weighted by amount, payments to suppliers average 54 days beyond terms</div> <div><div><input type="checkbox"/> High risk of late payment (Average 30 to 120 days beyond terms)</div><div><input type="checkbox"/> Medium risk of late payment (Average 30 days or less beyond terms)</div><div><input type="checkbox"/> Low risk of late payment (Average prompt to 30+ days sooner)</div></div>

D&B PAYDEX® COMPARISON

CURRENT YEAR

PAYDEX® of this Business compared to the Primary Industry from each of the last four quarters. The Primary Industry is Electric services , based on SIC code 4911 .

Shows the trend in D&B PAYDEX scoring over the past 12 months.

	2/19	3/19	4/19	5/19	6/19	7/19	8/19	9/19	10/19	11/19	12/19	12/19
This Business	80	80	66	66	51	51	42	37	37	37	42	42
Industry Quartile	-	-	78	-	-	78	-	-	78	-	-	78
Upper	-	-	74	-	-	74	-	-	74	-	-	74
Median	-	-	68	-	-	68	-	-	68	-	-	68
Lower												

Current PAYDEX for this Business is 42 , or equal to 54 days beyond terms
The 12-month high is 80 , or equal to GENERALLY WITHIN terms
The 12-month low is 71 , or equal to 14 DAYS BEYOND terms

PREVIOUS YEAR

Shows PAYDEX of this Business compared to the Primary Industry from each of the last four quarters. The Primary Industry is Electric services , based on SIC code 4911 .

Previous Year	4/18	7/18	10/18	1/19
	Q1'18	Q2'18	Q3'18	Q4'19
This Business	52	52	80	80
Industry Quartile				
Upper	78	78	78	78
Median	74	74	74	74
Lower	68	68	68	68

Based on payments collected over the last 4 quarters.

Current PAYDEX for this Business is 42, or equal to 54 days beyond terms

The present industry median Score is 74, or equal to 9 DAYS BEYOND terms

Industry upper quartile represents the performance of the payers in the 75th percentile

Industry lower quartile represents the performance of the payers in the 25th percentile

PAYMENT HABITS

For all payment experiences within a given amount of credit extended, shows the percent that this Business paid within terms. Provides number of experiences to calculate the percentage, and the total credit value of the credit extended.

Credit Extended	Payment Experiences	Total Amount	% of Payments Within Terms
Over 100,000			0%
50,000-100,000			0%
15,000-49,999			0%
5,000-14,999			0%
1,000-4,999	1	1,000	0%
Under 1,000	1	50	100%

Based on payments collected over last 24 months.

Payment experiences reflect how bills are paid in relation to the terms granted. In some instances, payment beyond terms can be the result of disputes over merchandise, skipped invoices, etc.

PAYMENT SUMMARY

There are 16 payment experience(s) in D&Bs file for the most recent 24 months, with 7 experience(s) reported during the last three month period.

The highest Now Owes on file is 50 . The highest Past Due on file is 0

Below is an overview of the company's currency-weighted payments, segmented by it's supplier's primary industries:

Top Industries	Total Revd (#)	Total Amount	Largest High Credit	Within Terms (%)	1 - 30 Days Late (%)	31 - 60 Days Late (%)	61 - 90 Days Late (%)	91 + Days Late (%)
Arrange cargo transpt	1	1,000	1,000	0	50	0	50	0
Misc business service	1	50	50	100	0	0	0	0

Other payment categories

Cash experiences	13	\$1,200	\$500
Payment record unknown	1	\$50	\$50
Unfavorable comments	0	\$0	\$0
Placed for collections	0	\$0	\$0
Total in D&B's file	16	\$2,300	\$1,000

Accounts are sometimes placed for collection even though the existence or amount of the debt is disputed.

Indications of slowness can be result of dispute over merchandise, skipped invoices, etc.

DETAILED PAYMENT HISTORY FOR THIS COMPANY

Date Reported (mm/yy)	Paying Record	High Credit	Now Owes	Past Due	Selling Terms	Last Sale Within (month)
12/19	Ppt	50	50	0		1 mo

12/19	(002)	100			Cash account	2-3 mos
12/19	(003)	50			Cash account	6-12 mos
11/19	Slow 30-90	1,000	0	0		2-3 mos
11/19	(005)	50			Cash account	1 mo
11/19	(006)	50			Cash account	6-12 mos
10/19	(007)	50				1 mo
08/19	(008)	50			Cash account	4-5 mos
07/19	(009)	100			Cash account	1 mo
07/19	(010)	100			Cash account	1 mo
06/19	(011)	50			Cash account	1 mo
05/19	(012)	50			Cash account	1 mo
04/19	(013)				Cash account	6-12 mos
04/19	(014)	50			Cash account	1 mo
04/19	(015)	50			Cash account	1 mo
09/18	(016)	500			Cash account	2-3 mos

Payments Detail Key: ■ 30 or more days beyond terms

Payment experiences reflect how bills are paid in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices, etc. Each experience shown is from a separate supplier.

Updated trade experiences replace those previously reported

Public Filings

The following data includes both open and closed filings found in D&B's database on this company.

Bankruptcies	Judgments	Liens	Suits	UCCs
0	0	1	0	18
Latest Filing:	Latest Filing:	Latest Filing: 10-17-2019	Latest Filing:	Latest Filing: 01-28-2019

The following Public Filing data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

LIENS

A **Lien** holder can file the same lien in more than one filing location. The appearance of multiple liens filed by the same lien holder against a debtor may be indicative of such an occurrence.

Amount	73467 (CERT DEBT)
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Status	Open
DOCKET NO.	DJ 161605 19
Type	State Tax
Filed By	DIV OF TAXATION
Against	SPARK ENERGY GAS LP
Where Filed	SUPERIOR COURT OF NEW JERSEY, TRENTON, NJ
Date Status Attained	10-17-2019
Date Filed	10-17-2019
Latest Info Received	10-20-2019

UCC FILINGS

Collateral	All Assets
Type	Original
Sec. Party	CO PERATIEVE RABOBANK U.A., NEW YORK BRANCH, NEW YORK, NY
Debtor	SPARK ENERGY GAS, LLC
Filing No.	170017353188
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	05-19-2017
Latest Info Received	05-23-2017

Collateral	Negotiable instruments and proceeds - Accounts receivable and proceeds - Account(s) and proceeds - General intangibles(s) and proceeds - Contract rights and proceeds
Type	Original

Sec. Party	KEYSPAN GAS EAST CORPORATION D/B/A NATIONAL GRID, HICKSVILLE, NY
Debtor	SPARK ENERGY GAS, LLC
Filing No.	150016021612
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	05-20-2015
Latest Info Received	06-02-2015

Collateral	Negotiable instruments and proceeds - Accounts receivable and proceeds - Account(s) and proceeds - General intangibles(s) and proceeds - Contract rights and proceeds
Type	Original
Sec. Party	THE BROOKLYN UNION GAS COMPANY D/B/A NATIONAL GRID NY, BROOKLYN, NY
Debtor	SPARK ENERGY GAS, LLC
Filing No.	150016021359
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	05-20-2015
Latest Info Received	06-02-2015

Collateral	Accounts receivable including proceeds and products - Account(s) including proceeds and products
Type	Original
Sec. Party	NIAGARA MOHAWK POWER CORPORATION D/B/A NATIONAL GRID, SYRACUSE, NY
Debtor	SPARK ENERGY GAS, LLC
Filing No.	180018873612

Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	05-29-2018
Latest Info Received	06-05-2018
Collateral	Inventory and proceeds - Account(s) and proceeds - Chattel paper and proceeds
Type	Original
Sec. Party	ICE NGX CANADA INC., CALGARY
Debtor	SPARK ENERGY GAS, LLC
Filing No.	190003375573
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	01-28-2019
Latest Info Received	02-12-2019
Collateral	Accounts receivable
Type	Amendment
Sec. Party	FORTIS CAPITAL CORP., ADDISON, TX
Debtor	SPARK ENERGY, L.P. and OTHERS
Filing No.	0700172640
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	05-22-2007
Latest Info Received	06-04-2007
Original UCC Filed Date	08-18-2003
Original Filing No	030038237753

Collateral	Account(s) and proceeds - General intangibles(s) and proceeds - Contract rights and proceeds
Type	Original
Sec. Party	KEYSPAN GAS EAST CORPORATION D/B/A NATIONAL GRID, HICKSVILLE, NY
Debtor	SPARK ENERGY GAS, L.P.
Filing No.	090023891032
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	08-26-2009
Latest Info Received	09-03-2009

Collateral	Account(s) and proceeds - General intangibles(s) and proceeds - Contract rights and proceeds
Type	Original
Sec. Party	THE BROOKLYN UNION GAS COMPANY D/B/A NATIONAL GRID NY, BROOKLYN, NY
Debtor	SPARK ENERGY GAS, L.P.
Filing No.	090023883407
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	08-26-2009
Latest Info Received	09-03-2009

Collateral	RIGHT, TITLE AND INTEREST and proceeds
Type	Original
Sec. Party	COLUMBIA GAS OF OHIO, INC., COLUMBUS, OH
Debtor	SPARK ENERGY GAS, LP

Filing No.	120031424522
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	10-03-2012
Latest Info Received	10-09-2012

Type	Continuation
Sec. Party	COLUMBIA GAS OF OHIO, INC., COLUMBUS, OH
Debtor	SPARK ENERGY GAS, LP
Filing No.	1700329163
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	09-28-2017
Latest Info Received	09-29-2017
Original UCC Filed Date	10-03-2012
Original Filing No	120031424522

Collateral	RIGHT, TITLE AND INTEREST and proceeds
Type	Original
Sec. Party	NORTHERN INDIANA PUBLIC SERVICE COMPANY, MERRILLVILLE, IN
Debtor	SPARK ENERGY GAS, L.P.
Filing No.	100016943044
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	06-11-2010
Latest Info Received	06-22-2010

Type	Continuation
Sec. Party	NORTHERN INDIANA PUBLIC SERVICE COMPANY, MERRILLVILLE, IN
Debtor	SPARK ENERGY GAS, L.P.
Filing No.	1500157838
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	05-20-2015
Latest Info Received	05-21-2015
Original UCC Filed Date	06-11-2010
Original Filing No	100016943044

Type	Amendment
Sec. Party	NORTHERN INDIANA PUBLIC SERVICE COMPANY, MERRILLVILLE, IN NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC, MERRILLVILLE, IN
Debtor	SPARK ENERGY GAS, L.P.
Filing No.	1800069139
Filed With	SECRETARY OF STATE/UCC DIVISION, AUSTIN, TX
Date Filed	03-01-2018
Latest Info Received	03-09-2018
Original UCC Filed Date	06-11-2010
Original Filing No	100016943044

There are additional UCC's in D&B's file on this company available by contacting 1-800-234-3867

The public record items contained in this report may have been paid, terminated, vacated or released prior to the date this report was printed.

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Special Events

09-07-2017 - HURRICANE HARVEY 2017:
This business is located in a FEMA designated disaster zone impacted by the effects of Hurricane Harvey. It is reported that thousands of people and businesses in Southern Texas have been displaced due to catastrophic flooding. The extent of impact to this business is currently unknown; additional information will be provided as it becomes available.

09-29-2016
The Chief Executive Officer is now WILLIAM KEITH MAXWELL III, CEO.

History & Operations

COMPANY OVERVIEW

Company Name	Phone	History
SPARK ENERGY GAS, LLC	877 547-7275	CLEAR
Doing Business As	URL	Present management control
(SUBSIDIARY OF SPARK ENERGY, INC., HOUSTON, TX)	www.urslp.com	19 years
SPARK ENERGY		
Street Address		
12140 Wickchester Ln Ste 100		
Houston, TX 77079		

HISTORY

The following information was reported **08/27/2019**

Officer(s):

- WILLIAM KEITH MAXWELL III, CEO
- NATHAN KROEKER, PRES
- TERRY D JONES, EXEC V PRES-GEN COUNSEL
- ALLISON WALL, COO
- GEORGANNE HODGES, CFO
- MARTY BREDEHOFT, TREAS

DIRECTOR(S): THE OFFICER(S)

The Texas Secretary of State's business registrations file showed that Spark Energy Gas, LLC was registered as a Limited Liability Company on May 21, 2014 under the file registration number 0801995548.

Business started 2001 by William Keith Maxwell III. 100% of capital stock is owned by the parent company.

While this company is a Limited Liability Company, the members have elected to use officer titles to denote the area of responsibility.

WILLIAM KEITH MAXWELL III. 2001-present active here.

NATHAN KROEKER born 1974. 2010-present active here.

TERRY D JONES. Antecedents not available.

ALLISON WALL. 2013-present active here.

GEORGANNE HODGES. 2013-present active here.

MARTY BREDEHOFT. 2011-present active here.

Business address has changed from 2105 Citywest Blvd Ste 100, Houston, TX, 77042 to 12140 Wickchester Ln Ste 100, Houston, TX, 77079.

AFFILIATES: The following are related through common principals, management and/or ownership: Spark Energy, LLC, Houston, TX. DUNS 37597437.

Spark Energy Ventures, LLC, Houston, TX. DUNS 827735304.

Spark Energy Holdings, LLC, Houston , TX. DUNS 69198468.

OPERATIONS

08/27/2019

Description:

- Subsidiary of SPARK ENERGY, INC., HOUSTON, TX.
- As noted, this company is a subsidiary of Spark Energy, Inc. Duns# 07-941-7907 , and reference is made to that report for background information on the parent and its management.
- Provides electric services (100%).
- Has 100 account(s). Terms are Net 30 days. Sells to general public and commercial concerns. Territory : United States.
- Nonseasonal.

Employees: 100 which includes officer(s).

Facilities: Rents premises on 1st & 2nd floor of a nine story steel building.

Subsidiaries:

SIC & NAICS

SIC:

NAICS:

- 221118 Other Electric Power Generation

Based on information in our file, D&B has assigned this company an extended 8-digit SIC. D&B's use of 8-digit SICs enables us to be more specific about a company's operations than if we use the standard 4-digit code.

The 4-digit SIC numbers link to the description on the Occupational Safety & Health Administration (OSHA) Web site. Links open in a new browser window.

- 4911 0000 Electric services

Financials

COMPANY FINANCIALS

D&B

Graph cannot be created

ADDITIONAL FINANCIAL DATA

D & B has updated this report using available sources.

REQUEST FINANCIALS STATEMENTS

You can ask D&B to make a personalized request to this company on your behalf to obtain its latest financial information by clicking the button below.

<input type="checkbox"/>	<u>Financial Date Requested</u>	<u>Requested Period</u>	<u>Requested Year</u>	<u>Requested By</u>	<u>Received Date</u>	<u>Status</u>
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No data found

The requested financials below were provided by SPARK ENERGY GAS, LLC and are not DUNSRight certified.

KEY BUSINESS RATIOS

D & B has been unable to obtain sufficient financial information from this company to calculate business ratios. Our check of additional outside sources also found no information available on its financial performance.

To help you in this instance, ratios for other firms in the same industry are provided below to support your analysis of this business.

Based on this Number of Establishments : 83

Industry Norms Based On 83 Establishments

	This Business	Industry Median	Industry Quartile
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Profitability			
Return on Sales %	UN	7.6	UN
Return on Net Worth %	UN	7.8	UN
Short Term Solvency			
Current Ratio	UN	1.0	UN
Quick Ratio	UN	0.4	UN
Efficiency			
Assets to Sale %	UN	264.3	UN
Sales/Net Working Capital	UN	7.4	UN
Utilization			
Total Liabilities / Net Worth %	UN	173.6	UN
UN = Unavailable			
Spread Financials			
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Thursday, July 23, 2020

Spark Energy Gas, LLC
Attn: Muriel LeClerc
12140 Wickchester Ln, Ste 100
Houston, Texas 77079

Re: Columbia Gas of Ohio Collateral Requirements

To Whom It May Concern:

Spark Energy Gas, LLC has complied with Columbia Gas of Ohio's collateral requirements.

Sincerely,

Michele Caddell

Michele Caddell
Director, Transportation Programs and Nominations

Exhibit B-3: Disclosure of Liabilities and Investigations
Exhibit B-4: Disclosure of Consumer Protection Violations

1. MD PSC v Major Energy Services, LLC (Case No. 9346(b) (2016)):

State: Maryland

Agency: M.D. Public Service Commission (“PSC”)

Date Completed: 02/26/2016

Status: Complete (appeal resolved (02/26/2016))

Entity: Major Energy Services, LLC / Major Energy Electric services LLC

Reference No.: Public Service Commission of MD Case No. 9346(b)

Description: Action regarding the alleged violation of any provision of Title 7, subtitles 5 & 6 of PUA; Title 20, subtitles 51-55 and 59 of COMAR, or applicable Commission Order in their customer marketing, advertising, or trade practices. The order approving the PSC findings resulted in the payment of **\$300,000** in Civil Penalties for civil penalties.

2. TX PSC v Spark Energy, LLC (Docket No. 45520 (2016)):

State: Texas

Agency: Public Utility Commission (“PSC”)

Date Completed: 03/07/2016 (final Order Approving Settlement)

Status: Complete

Entity: Spark Energy, LLC

Reference No.: Public Utility Commission of Texas Docket No. 45520, Order

Description: Action regarding the alleged violation of 16 T.A.C. section 25.454 (rate reduction program), 16 T.A.C. section 25.480 (bill payment and adjustments), 16 T.A.C. section 25.483 (disconnection of service). The Order approving the settlement was a voluntary dismissal of an investigation with a finding of guilt with the following settlement with an administrative penalty of **\$160,000**.

3. NY PSC v Spark Energy, LLC (Case No. 16-M-0468 (2017)):

a. **State:** New York

b. **Agency:** Public Service Commission (PSC)

c. **Date Completed:** 05/18/2017

d. **Status:** Complete. (Order to Continue ESCO Eligibility with Contingencies 05/19/2017). No Fault.

e. **Entity:** Spark Energy Gas, LLC

- f. **Reference No.:** N.Y. PSC Case 16-M-0468
 - g. **Description:** Action regarding allegations of Slamming and Deceptive Marketing. Upon review of Spark’s responses to numerous document requests, the NY PSC issued an Order to Continue ESCO Eligibility with Contingencies, which “closed” the proceedings with no finding of fault or assessment of penalties.
4. **NY PSC v Major Energy Services, LLC (NOAF 10/31/2017 (2017)):**
- a. **State:** New York
 - b. **Agency:** Public Service Commission (PSC)
 - c. **Date Completed:** 11/2017
 - d. **Status:** closed
 - e. **Entity:** Major Energy Services, LLC
 - f. **Reference No.:** NOAF Issued 10/31/2017
 - g. **Description:** investigating excessive number of complaints. Provided satisfactory responses.
5. **CT PURA v Spark Energy, LLC (Docket No. 10-06-18RE01 (2018)):**
- a. **State:** Connecticut
 - b. **Agency:** Public Utility Regulatory Authority (“PURA”)
 - c. **Date Completed:** Pending (Notice of violation filed March 28, 2018)
 - d. **Status:** Pending (case suspended 01/03/2019 due to docket 18-12-22)
 - e. **Entity:** Spark Energy, LLC
 - f. **Reference No.:** Docket 10-06-18RE01
 - g. **Description:** Action regarding the alleged violation of Conn. Gen. Stat. Section 16-245d(a)(2) and the August 2015 Decision in Docket No. 14-07-19RE01, “*PURA Investigation into Redesign of the Residential Electric Billing Format – Billing Format Clarifications*” of delinquency in supplying electric distribution companies (EDC) with the Next Rate in a timely manner. The proposed civil penalty of **\$900,000**. On 01/03/2019 PURA suspended the investigation due to the opening of Docket 18-12-22 which may impact the investigation. Spark has entered the Amnesty program directly impacting this matter and informed PURA in this docket of such entry on 01/17/2019.
6. **IL AG v Major Energy Electric Services, LLC (Docket No. 2018-CH-04549 (2019)):**
- a. **State:** Illinois
 - b. **Agency:** Attorney General (AG)
 - c. **Date Completed:** 08/16/2019
 - d. **Status:** Complete (Settlement 08/2019)
 - e. **Entity:** Major Energy Electric Services, LLC

- f. **Reference No.**: Circuit Court of Cook County, County Department, Chancery Div. Docket No. 2018-CH-04549
 - g. **Description**: Action regarding alleged violations of Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/1 et seq., Illinois Telephone Solicitation Act, 815 ILCS 413/1 et seq., Illinois Automatic Contract Renewal Act, 815 ILCS 605/5 et seq, and the Illinois Prize and Gifts Act, 815 ILCS 525/1 et seq. Penalty, **\$2,000,000**.
7. **ME PUC v Electricity Maine, LLC (Docket No. 2010-00256 (2018))**:
- a. **State**: Maine
 - b. **Agency**: Public Utility Commission (PUC)
 - c. **Date Completed**: pending (Order to Show Cause issued 07/24/2018)
 - d. **Status**: pending
 - e. **Entity**: Electricity Maine, LLC
 - f. **Reference No.**: Maine PUC Docket No. 2010-00256
 - g. **Description**: Consumer Protection Violations including deceptive or misleading acts or solicitations; failure to inform the Commission or reinstatement of solicitation after informing the Commission that it would do so.
8. **TX PUC v Spark Energy, LLC (Investigation No. 49684 (2018))**:
- a. **State**: Texas
 - b. **Agency**: Public Utility Commission (PUC)
 - c. **Date Completed**: 6/26/2019
 - d. **Status**: Complete
 - e. **Entity**: Spark Energy, LLC
 - f. **Reference No.**: Investigation Docket No. 49684
 - g. **Description**: Telemarketing and deceptive Marketing allegations.
9. **CT PURA v Spark Energy, LLC (Docket No. 10-06-18RE02 (2018))**:
- a. **State**: Connecticut
 - b. **Agency**: Public Utility Regulatory Authority (“PURA”)
 - c. **Date Completed**: 07/17/2019
 - d. **Status**: Complete
 - e. **Entity**: Spark Energy, LLC
 - f. **Reference No.**: PURA Docket 10-06-18REO2
 - g. **Description**: Spark failed to comply with the provisions of Conn. Gen. Stat. Section 16-245(g)(2), 16-245o(h)(1), 16-245o(h)(2)(A), 16-245o(h)(3), 16-245o(h)(4), 16-245o(j), and 42-110b, by utilizing a pre-recorded message that (1) never identified that identifies Spark as the entity conducting the telemarketing,

(2) represented to customers that the solicitation call is from an electric distribution company (3) never explained the purpose of the sales call and (4) misstated the electric distribution company's current charges. Penalty **\$750,000**.

10. NY DOS v Verde Energy USA New York, LLC (Investigation No. 2019-C-042201 (2019)):

- a. **State:** New York
- b. **Agency:** Department of State, Division of Consumer Protections (DCP)
- c. **Date Completed:** pending
- d. **Status:** pending
- e. **Entity:** Verde Energy USA New York, LLC
- f. **Reference No.:** DNC Compliance File No. 2019C042201
- g. **Description:** Telemarketing DNC violations alleged.

11. CT PURA v Spark Energy, LLC (Docket No. 10-06-18RE03 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utilities Regulatory Authority (PURA)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Investigation Docket No. 10-06-18-RE03
- a. **Description:** investigate Spark's marketing, billing, and enrollment practices, as well as compliance with notification requirements.

12. OH AG v Verde Energy USA Ohio, LLC (Investigation No. 577403 (2019)):

- a. **State:** Ohio
- b. **Agency:** Attorney General (AG)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Verde Energy USA Ohio, LLC
- f. **Reference No.:** Investigation Docket No. 577403
- g. **Description:** Alleged violation of the Consumer Sales Practice Act Ohio Rev. Code Sec. 1345.01.

13. Pennsylvania PUC v Verde Energy USA, LLC (I&E Data Request (2019)):

- a. **State:** Pennsylvania
- b. **Agency:** Public Utility Commission (PUC)
- c. **Date Completed:** pending
- d. **Status:** Pending

- e. **Entity:** Verde Energy USA, LLC
- f. **Reference No.:** I&E Data Request Set I
- g. **Description:** Alleged violation of the Chapter 54 and 111 of Title 52.

14. Connecticut PURA v Verde Energy USA, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** 06/16/2020
- d. **Status:** Complete
- e. **Entity:** Verde Energy USA, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program – As a result of voluntary participation program, the Authority forbore from imposing a penalty for all Next Cycle Rate violations that occurred between 1-1-2016 to 1-28-2019. Major is obligated to provide a refund to any customers that it did not identify in its 2nd Revised Amnesty Plan who can demonstrated that he was timely notified as the Next Cycle Rate as required by the Authority's 8-12-2015 Decision in Docket 14-07-19RE01.

15. Connecticut PURA v HIKO Energy, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** HIKO Energy, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program

16. Connecticut PURA v Major Energy Services, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** 06/11/2020
- d. **Status:** Complete
- e. **Entity:** Major Energy Services, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program – As a result of voluntary participation program, the Authority forbore from imposing a penalty for all Next Cycle Rate violations that occurred between 1-1-2016 to 1-28-2019. Major is

obligated to provide a refund to any customers that it did not identify in its 2nd Revised Amnesty Plan who can demonstrated that he was timely notified as the Next Cycle Rate as required by the Authority's 8-12-2015 Decision in Docket 14-07-19RE01.

17. Connecticut PURA v Spark Energy, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program

18. New Jersey BPU v CenStar Energy Corp., HIKO Energy, LLC, Major Energy Electric Services, LLC, Oasis Energy, LLC, Respond Power, LLC, Spark Energy, LLC and Spark Energy Gas, LLC (Docket No. ES 19060756 (2019)):

- a. **State:** New Jersey
- b. **Agency:** Board of Public Utilities (BPU)
- c. **Date Completed:** 09/27/2019
- d. **Status:** Complete (Settlement approved)
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Licensing Docket No. ES 19060756
- g. **Description:** Failed to apply for License Renewal Application NJSA 48:3-78 and NJAC 14:4-1.1. Penalty **\$55,000**.

19. Ohio PUCO v Verde Energy USA Ohio, LLC (Docket No. 19-0958-GE-COI (2019)):

- a. **State:** Ohio
- b. **Agency:** Public Utility Commission of Ohio (PUCO)
- c. **Date Completed:** 02/26/2020
- d. **Status:** Complete (Stipulation Approved) No admission or finding of liability
- e. **Entity:** Verde Energy USA Ohio, LLC
- f. **Reference No.:** Docket No. 19-0958-GE-COI
- g. **Description:** alleged deceptive marketing and telemarketing violations. Verde voluntarily ceased all marketing and customer enrollment activities in Ohio for 18 months; Verde withdrew from Dominion's MVR program for one year; Refunds of approximately **\$1,068,000**; forfeiture of **\$675,000**.

20. Ohio PUCO v. Major Energy Services, LLC (Notice of Non-Compliance 01-10-2020)

- a. **State:** Ohio
- b. **Agency:** Public Utility Commission of Ohio (PUCO)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Major Energy Services, LLC / Major Energy Electric Services, LLC
- f. **Reference No.:** Notice of Probable Non-Compliance 01-10-2020
- g. **Description:** alleged deceptive marketing and slamming violations.

21. Pennsylvania PUC v. Verde Energy USA, LLC (Docket No. C-2020-3017229 (2020))

- a. **State:** Pennsylvania
- b. **Agency:** Public Utilities Commission (“PUC”)
- c. **Date Completed:** pending
- d. **Status:** pending
- e. **Entity:** Verde Energy USA Ohio, LLC
- f. **Reference No.:** Docket Number C-2020-3017229 (01/30/2020)
- g. **Description:** Allegations of Misleading and Deceptive telemarketing/door-to-door conduct, slamming, and release of private customer information/unauthorized access to accounts, and failure to maintain verification records.

22. Illinois ICC and AG v. Spark Energy, LLC (Informal (01-01-2020))

- a. **State:** Illinois
- b. **Agency:** Illinois Commerce Commission (“ICC”) and Attorney General (“AG”)
- c. **Date Completed:** pending
- d. **Status:** pending
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Informal
- g. **Description:** High number of complaints

Exhibit B-3: Disclosure of Liabilities and Investigations
Exhibit B-4: Disclosure of Consumer Protection Violations

1. MD PSC v Major Energy Services, LLC (Case No. 9346(b) (2016)):

State: Maryland

Agency: M.D. Public Service Commission (“PSC”)

Date Completed: 02/26/2016

Status: Complete (appeal resolved (02/26/2016))

Entity: Major Energy Services, LLC / Major Energy Electric services LLC

Reference No.: Public Service Commission of MD Case No. 9346(b)

Description: Action regarding the alleged violation of any provision of Title 7, subtitles 5 & 6 of PUA; Title 20, subtitles 51-55 and 59 of COMAR, or applicable Commission Order in their customer marketing, advertising, or trade practices. The order approving the PSC findings resulted in the payment of **\$300,000** in Civil Penalties for civil penalties.

2. TX PSC v Spark Energy, LLC (Docket No. 45520 (2016)):

State: Texas

Agency: Public Utility Commission (“PSC”)

Date Completed: 03/07/2016 (final Order Approving Settlement)

Status: Complete

Entity: Spark Energy, LLC

Reference No.: Public Utility Commission of Texas Docket No. 45520, Order

Description: Action regarding the alleged violation of 16 T.A.C. section 25.454 (rate reduction program), 16 T.A.C. section 25.480 (bill payment and adjustments), 16 T.A.C. section 25.483 (disconnection of service). The Order approving the settlement was a voluntary dismissal of an investigation with a finding of guilt with the following settlement with an administrative penalty of **\$160,000**.

3. NY PSC v Spark Energy, LLC (Case No. 16-M-0468 (2017)):

a. **State:** New York

b. **Agency:** Public Service Commission (PSC)

c. **Date Completed:** 05/18/2017

d. **Status:** Complete. (Order to Continue ESCO Eligibility with Contingencies 05/19/2017). No Fault.

e. **Entity:** Spark Energy Gas, LLC

- f. **Reference No.:** N.Y. PSC Case 16-M-0468
 - g. **Description:** Action regarding allegations of Slamming and Deceptive Marketing. Upon review of Spark’s responses to numerous document requests, the NY PSC issued an Order to Continue ESCO Eligibility with Contingencies, which “closed” the proceedings with no finding of fault or assessment of penalties.
4. **NY PSC v Major Energy Services, LLC (NOAF 10/31/2017 (2017)):**
- a. **State:** New York
 - b. **Agency:** Public Service Commission (PSC)
 - c. **Date Completed:** 11/2017
 - d. **Status:** closed
 - e. **Entity:** Major Energy Services, LLC
 - f. **Reference No.:** NOAF Issued 10/31/2017
 - g. **Description:** investigating excessive number of complaints. Provided satisfactory responses.
5. **CT PURA v Spark Energy, LLC (Docket No. 10-06-18RE01 (2018)):**
- a. **State:** Connecticut
 - b. **Agency:** Public Utility Regulatory Authority (“PURA”)
 - c. **Date Completed:** Pending (Notice of violation filed March 28, 2018)
 - d. **Status:** Pending (case suspended 01/03/2019 due to docket 18-12-22)
 - e. **Entity:** Spark Energy, LLC
 - f. **Reference No.:** Docket 10-06-18RE01
 - g. **Description:** Action regarding the alleged violation of Conn. Gen. Stat. Section 16-245d(a)(2) and the August 2015 Decision in Docket No. 14-07-19RE01, “*PURA Investigation into Redesign of the Residential Electric Billing Format – Billing Format Clarifications*” of delinquency in supplying electric distribution companies (EDC) with the Next Rate in a timely manner. The proposed civil penalty of **\$900,000**. On 01/03/2019 PURA suspended the investigation due to the opening of Docket 18-12-22 which may impact the investigation. Spark has entered the Amnesty program directly impacting this matter and informed PURA in this docket of such entry on 01/17/2019.
6. **IL AG v Major Energy Electric Services, LLC (Docket No. 2018-CH-04549 (2019)):**
- a. **State:** Illinois
 - b. **Agency:** Attorney General (AG)
 - c. **Date Completed:** 08/16/2019
 - d. **Status:** Complete (Settlement 08/2019)
 - e. **Entity:** Major Energy Electric Services, LLC

- f. **Reference No.**: Circuit Court of Cook County, County Department, Chancery Div. Docket No. 2018-CH-04549
 - g. **Description**: Action regarding alleged violations of Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/1 et seq., Illinois Telephone Solicitation Act, 815 ILCS 413/1 et seq., Illinois Automatic Contract Renewal Act, 815 ILCS 605/5 et seq, and the Illinois Prize and Gifts Act, 815 ILCS 525/1 et seq. Penalty, **\$2,000,000**.
7. **ME PUC v Electricity Maine, LLC (Docket No. 2010-00256 (2018))**:
- a. **State**: Maine
 - b. **Agency**: Public Utility Commission (PUC)
 - c. **Date Completed**: pending (Order to Show Cause issued 07/24/2018)
 - d. **Status**: pending
 - e. **Entity**: Electricity Maine, LLC
 - f. **Reference No.**: Maine PUC Docket No. 2010-00256
 - g. **Description**: Consumer Protection Violations including deceptive or misleading acts or solicitations; failure to inform the Commission or reinstatement of solicitation after informing the Commission that it would do so.
8. **TX PUC v Spark Energy, LLC (Investigation No. 49684 (2018))**:
- a. **State**: Texas
 - b. **Agency**: Public Utility Commission (PUC)
 - c. **Date Completed**: 6/26/2019
 - d. **Status**: Complete
 - e. **Entity**: Spark Energy, LLC
 - f. **Reference No.**: Investigation Docket No. 49684
 - g. **Description**: Telemarketing and deceptive Marketing allegations.
9. **CT PURA v Spark Energy, LLC (Docket No. 10-06-18RE02 (2018))**:
- a. **State**: Connecticut
 - b. **Agency**: Public Utility Regulatory Authority (“PURA”)
 - c. **Date Completed**: 07/17/2019
 - d. **Status**: Complete
 - e. **Entity**: Spark Energy, LLC
 - f. **Reference No.**: PURA Docket 10-06-18REO2
 - g. **Description**: Spark failed to comply with the provisions of Conn. Gen. Stat. Section 16-245(g)(2), 16-245o(h)(1), 16-245o(h)(2)(A), 16-245o(h)(3), 16-245o(h)(4), 16-245o(j), and 42-110b, by utilizing a pre-recorded message that (1) never identified that identifies Spark as the entity conducting the telemarketing,

(2) represented to customers that the solicitation call is from an electric distribution company (3) never explained the purpose of the sales call and (4) misstated the electric distribution company's current charges. Penalty **\$750,000**.

10. NY DOS v Verde Energy USA New York, LLC (Investigation No. 2019-C-042201 (2019)):

- a. **State:** New York
- b. **Agency:** Department of State, Division of Consumer Protections (DCP)
- c. **Date Completed:** pending
- d. **Status:** pending
- e. **Entity:** Verde Energy USA New York, LLC
- f. **Reference No.:** DNC Compliance File No. 2019C042201
- g. **Description:** Telemarketing DNC violations alleged.

11. CT PURA v Spark Energy, LLC (Docket No. 10-06-18RE03 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utilities Regulatory Authority (PURA)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Investigation Docket No. 10-06-18-RE03
- a. **Description:** investigate Spark's marketing, billing, and enrollment practices, as well as compliance with notification requirements.

12. OH AG v Verde Energy USA Ohio, LLC (Investigation No. 577403 (2019)):

- a. **State:** Ohio
- b. **Agency:** Attorney General (AG)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Verde Energy USA Ohio, LLC
- f. **Reference No.:** Investigation Docket No. 577403
- g. **Description:** Alleged violation of the Consumer Sales Practice Act Ohio Rev. Code Sec. 1345.01.

13. Pennsylvania PUC v Verde Energy USA, LLC (I&E Data Request (2019)):

- a. **State:** Pennsylvania
- b. **Agency:** Public Utility Commission (PUC)
- c. **Date Completed:** pending
- d. **Status:** Pending

- e. **Entity:** Verde Energy USA, LLC
- f. **Reference No.:** I&E Data Request Set I
- g. **Description:** Alleged violation of the Chapter 54 and 111 of Title 52.

14. Connecticut PURA v Verde Energy USA, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** 06/16/2020
- d. **Status:** Complete
- e. **Entity:** Verde Energy USA, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program – As a result of voluntary participation program, the Authority forbore from imposing a penalty for all Next Cycle Rate violations that occurred between 1-1-2016 to 1-28-2019. Major is obligated to provide a refund to any customers that it did not identify in its 2nd Revised Amnesty Plan who can demonstrated that he was timely notified as the Next Cycle Rate as required by the Authority's 8-12-2015 Decision in Docket 14-07-19RE01.

15. Connecticut PURA v HIKO Energy, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** HIKO Energy, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program

16. Connecticut PURA v Major Energy Services, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** 06/11/2020
- d. **Status:** Complete
- e. **Entity:** Major Energy Services, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program – As a result of voluntary participation program, the Authority forbore from imposing a penalty for all Next Cycle Rate violations that occurred between 1-1-2016 to 1-28-2019. Major is

obligated to provide a refund to any customers that it did not identify in its 2nd Revised Amnesty Plan who can demonstrated that he was timely notified as the Next Cycle Rate as required by the Authority's 8-12-2015 Decision in Docket 14-07-19RE01.

17. Connecticut PURA v Spark Energy, LLC (Docket No. 18-12-22 (2019)):

- a. **State:** Connecticut
- b. **Agency:** Public Utility Regulatory Authority (PURA)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Amnesty Docket No. 18-12-22
- g. **Description:** Next Rate Cycle Amnesty Program

18. New Jersey BPU v CenStar Energy Corp., HIKO Energy, LLC, Major Energy Electric Services, LLC, Oasis Energy, LLC, Respond Power, LLC, Spark Energy, LLC and Spark Energy Gas, LLC (Docket No. ES 19060756 (2019)):

- a. **State:** New Jersey
- b. **Agency:** Board of Public Utilities (BPU)
- c. **Date Completed:** 09/27/2019
- d. **Status:** Complete (Settlement approved)
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Licensing Docket No. ES 19060756
- g. **Description:** Failed to apply for License Renewal Application NJSA 48:3-78 and NJAC 14:4-1.1. Penalty **\$55,000**.

19. Ohio PUCO v Verde Energy USA Ohio, LLC (Docket No. 19-0958-GE-COI (2019)):

- a. **State:** Ohio
- b. **Agency:** Public Utility Commission of Ohio (PUCO)
- c. **Date Completed:** 02/26/2020
- d. **Status:** Complete (Stipulation Approved) No admission or finding of liability
- e. **Entity:** Verde Energy USA Ohio, LLC
- f. **Reference No.:** Docket No. 19-0958-GE-COI
- g. **Description:** alleged deceptive marketing and telemarketing violations. Verde voluntarily ceased all marketing and customer enrollment activities in Ohio for 18 months; Verde withdrew from Dominion's MVR program for one year; Refunds of approximately **\$1,068,000**; forfeiture of **\$675,000**.

20. Ohio PUCO v. Major Energy Services, LLC (Notice of Non-Compliance 01-10-2020)

- a. **State:** Ohio
- b. **Agency:** Public Utility Commission of Ohio (PUCO)
- c. **Date Completed:** pending
- d. **Status:** Pending
- e. **Entity:** Major Energy Services, LLC / Major Energy Electric Services, LLC
- f. **Reference No.:** Notice of Probable Non-Compliance 01-10-2020
- g. **Description:** alleged deceptive marketing and slamming violations.

21. Pennsylvania PUC v. Verde Energy USA, LLC (Docket No. C-2020-3017229 (2020))

- a. **State:** Pennsylvania
- b. **Agency:** Public Utilities Commission (“PUC”)
- c. **Date Completed:** pending
- d. **Status:** pending
- e. **Entity:** Verde Energy USA Ohio, LLC
- f. **Reference No.:** Docket Number C-2020-3017229 (01/30/2020)
- g. **Description:** Allegations of Misleading and Deceptive telemarketing/door-to-door conduct, slamming, and release of private customer information/unauthorized access to accounts, and failure to maintain verification records.

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- a. **State:** Illinois
- b. **Agency:** Illinois Commerce Commission (“ICC”) and Attorney General (“AG”)
- c. **Date Completed:** pending
- d. **Status:** pending
- e. **Entity:** Spark Energy, LLC
- f. **Reference No.:** Informal
- g. **Description:** High number of complaints

Competitive Retail Natural Gas Service Affidavit

County of Harris :

State of Texas :

James G. Jones

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, and that it will amend its application while it is pending if any substantial changes occur regarding the information provided.
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 Sections 4905.10 and 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 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. 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 comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
8. Applicant will inform the Public Utilities Commission of Ohio 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 consumer complaints.
9. The facts set forth above are true and accurate 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.

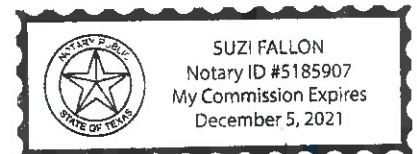
10. Affiant further sayeth naught.

[Signature] Chief Financial Officer
Signature of Affiant & Title

Sworn and subscribed before me this 23rd day of July, 2020
Month Year

[Signature]
Signature of official administering oath

Suzi Fallon, Notary
Print Name and Title



My commission expires on 12.05.2021

This foregoing document was electronically filed with the Public Utilities

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8/5/2020 10:24:13 AM

in

Case No(s). 08-0638-GA-CRS

Summary: In the Matter of the Application of Spark Energy Gas LP