



DIS Case Number: 09-0459-GA-CRS

Section A: Application Information

A-1. Provider type:

☒ Retail Natural Gas
Broker

☒ Retail Natural Gas
Aggregator

☒ Retail Natural Gas
Marketer

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

Legal Name: Constellation NewEnergy - Gas
Division, LLC

Country: United States

Phone: 844-200-
3427

**Extension (if
applicable):**

Street: 9400 Bunsen Parkway, Suite 100

Website (if any): www.constellation.com

City: Louisville

Province/State: KY

Postal Code: 40220

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
Constellation NewEnergy - Gas Division, LLC	Official Name	9400 Bunsen Parkway, Suite 100 Louisville, KY 40220	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
Constellation NewEnergy - Gas Division, LLC	Official Name	9400 Bunsen Parkway, Suite 100 Louisville, KY 40220	Yes	File



A-5. Contact person for regulatory matters

Darcy Fabrizious
1221 Lamar St
Houston, TX 77010
US
darcy.fabrizius@constellation.com
2625066631

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

CONSUMER COMPLAINT-Constellation NewEnergy – Gas Division
1001 Louisiana ST, Suite 2300
Houston, TX 77002
US
choicecompliance@constellation.com
7138525541

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

Phone: 844-200-3427	Extension (if applicable):	Country: United States
Fax:	Extension (if applicable):	Street: 1001 Louisiana Street, Suite 2300
Email: choicecompliance@constellation.com	City: Houston	Province/State: TX
	Postal Code: 77002	

A-8. Applicant's federal employer identification number

23-2990190

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: 01-01-1999

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
Bryan Wright	byran.wright@exeloncorp.com	Chief Financial Officer	1310 Point St. Baltimore, MD 21231 US
Elisabeth Graham	elisabeth.graham@exeloncorp.com	Treasurer	10 S. Dearborn St. Chicago, IL 60603 US
Robert Kleczynski	robert.kleczynski@exeloncorp.com	Vice President, Taxes	10 S. Dearborn St. Chicago, IL 60603 US
Nina Jezic	nina.jezic@constellation.com	Assistant Secretary	1001 Louisiana St, Suite 2300 Houston, TX 77002 US
Leonardo Caro	dino.caro@constellation.com	Senior Vice President	38777 Six Mile Road, Suite 209 Livonia, MI 48152 US
Katherine Smith	katherine.smith2@exeloncorp.com	Secretary	10 S. Dearborn St. Chicago, IL 60603 US
Joseph Kirwan	joseph.kirwan@constellation.com	Assistant Secretary	9400 Bunsen Parkway, Suite 100 Louisville, KY 40220 US



Public Utilities Commission

Ryan Brown	ryan.brown@comed.com	Assistant Treasurer	10 S. Dearborn St. Chicago, IL 60603 US
Benjamin Haas	benjamin.haas@exeloncorp.com	Assistant Vice President, Taxes	2301 Market St. Philadelphia, PA 19101 US
Carter Culver	carter.culver@exeloncorp.com	Assistant Secretary	10 S. Dearborn St. Chicago, IL 60603 US
David Dardis	david.dardis@constellation.com	Assistant Secretary	1310 Point St. Baltimore, MD 21231 US
Mark Huston	mark.huston@exeloncorp.com	President	1310 Point Street Baltimore, MD 21231 US
Denis Eischen	denis.eischen@exeloncorp.com	Assistant Vice President, Taxes	10 S. Dearborn St. Chicago, IL 60603 US

A-13. Company history

Alliance Gas Services, Inc. (AGS) was founded in 1993. In 1995, 50% of the assets of AGS were sold to Conoco Inc., and the general partnership known as Alliance Energy Services Partnership (Alliance) was created in order to expand Alliance's natural gas commodity business across North America. In November 2001, Alliance was sold to Allegheny Energy, Inc., and subsequently to Constellation Energy Group, Inc. (CEG) in December 2002. In October 2003, CEG announced the consolidation of three acquired subsidiaries into one. Alliance Energy Services, the entity formerly owned by Allegheny Energy, and Midwest natural gas marketers Kaztex Energy Management and Blackhawk Energy Services became Constellation NewEnergy-Gas Division, LLC (CNEG). NOCO Energy Marketing, LLC was acquired in April 2006. In July 2007, CNEG acquired Cornerstone Energy. In March 2012, CEG merged with Exelon Corporation. In April 2014, CNEG acquired ETC ProLiance Energy, LLC. On August 1, 2017, Compass Gas Services, LLC merged with and into Compass Energy Services, Inc. which merged with and into Constellation Energy Services – Natural Gas, LLC which merged with and into CNEG. In December 2019, CNEG acquired a group of retail customers located in the states of Kansas and Colorado from nTherm, LLC. CNEG's ultimate indirect parent is Exelon Corporation.

A-14. Secretary of State

Secretary of State Link:

A-15. Proof of Ohio Employee and Office



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: Brandon Horton
355 E. Campus Blvd, Suite 150
Columbus, OH 43235
US
brandon.horton@constellation.com
3125903727

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..

Jurisdiction of Operation: Constellation NewEnergy-Gas Division, LLC (CNEG) is currently licensed by the Public Utilities Commission of Ohio to serve residential, small commercial, large commercial and industrial customers in the service territories of Columbia Gas of Ohio, Dominion East Ohio, Duke Energy Ohio, and Vectren Energy Delivery of Ohio.

In addition, CNEG is licensed or registered as a natural gas marketer in California, Connecticut, Georgia, Illinois, Iowa, Maine, Maryland, Massachusetts, Michigan, Nebraska, New Jersey, New York, Pennsylvania, Rhode Island, Virginia, and the District of Columbia. The remaining jurisdictions in which CNEG provides natural gas services either do not require a natural gas supplier or marketer to be licensed or do not require certification for natural gas marketers who provide services only to large commercial and industrial end users.

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.



Application Experience and Plan Description: Constellation NewEnergy-Gas Division, LLC (CNEG) is comprised of professionals located in its headquarters in Louisville, KY and other regional offices throughout the U.S. CNEG's management has significant experience in the natural gas market and intimate knowledge of the day to day operations of an energy management company. CNEG's team shares responsibilities for scheduling, nominating, and balancing their customers' natural gas supplies and related needs. CNEG works with pipelines and negotiates with local utilities to perform ongoing volume and balancing management. CNEG develops supply portfolios to serve its large commercial and industrial customers that are sufficiently diverse and flexible to handle supply disruptions that affect specific suppliers or pipelines. CNEG utilizes load profiles for specific types of customers as modified by weather to support its gas acquisition and management efforts. In 2020, CNEG served residential, commercial and industrial customers with a volume of over 44,000,000 Mcf in Ohio.

CNEG is committed to meeting the requirements of the Public Utilities Commission of Ohio's (Commission) rules adopted pursuant to Section 4928.10 and 4929.22 of the Ohio Revised Code regarding contracting with customers, providing contracted services, billing statements, and responding to customer inquiries and complaints.

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..

Liability and Investigations Disclosures: Constellation NewEnergy – Gas Division and its Affiliates have been and are involved on an ongoing basis in litigation, inquiries, proceedings, and investigations before various regulatory entities for various matters. Any penalties from concluded proceedings have been paid and all concluded proceedings have been resolved appropriately, and information regarding material litigation and regulatory proceedings is disclosed in Exelon Corporation's SEC Filings available at <http://www.exeloncorp.com/investor-relations/reports-and-sec-filings>.

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?

No



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): Constellation NewEnergy – Gas Division, LLC (CNEG) does not file 10-Ks as a stand-alone company. CNEG's ultimate parent, Exelon Corporation, makes those filings with the SEC. Exelon Corporation's most recent SEC Form 10-K is dated February 24, 2021. All Exelon Corporation's SEC filings can be found at the following weblink:
<https://investors.exeloncorp.com/sec-filings>

C-2. Financial statements

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): Constellation NewEnergy – Gas Division, LLC does not maintain individual audited financial statements. The annual reports for Exelon Corporation contain the audited financial statements for all Exelon companies on a consolidated basis. Exelon Corporation's Annual Reports can be viewed at the following weblink:
<https://investors.exeloncorp.com/sec-filings>

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 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



Public Utilities Commission

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.

This does not apply.

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?

Merger Information: In December 2019, Constellation NewEnergy – Gas Division, LLC, CNEG, acquired a group of retail customers located in the states of Kansas and Colorado from nTherm, LLC. CNEG has not been involved in dissolution, merger or acquisition activity in Ohio within the past 24 months.



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 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).

Preferred to file confidentially



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.



Operations Description: Constellation NewEnergy-Gas Division, LLC (CNEG) is a full-service provider of natural gas supply and transportation-related services to retail customers throughout North America including residential, commercial, industrial, municipal and power generation facilities. CNEG is an active market participant in all major supply basins and trading points in North America managing supply, transportation and distribution on more than 45 interstate pipelines and 100+ LDCs. CNEG does not own physical infrastructure, such as pipelines and meters, but does acquire natural gas supply and interstate pipeline capacity. In the provision of its natural gas commodity and related services, CNEG evaluates competitively priced supply options from all applicable supply basins and create supply portfolios needed to fulfill CNEG customer's requirements. CNEG shares responsibilities for scheduling, nominating, and balancing their customers' natural gas supplies and related needs. CNEG works with pipelines and negotiates with local utilities, to perform ongoing volume and balancing management. CNEG develops supply portfolios to serve its large commercial and industrial customers that are sufficiently diverse and flexible to handle supply disruptions that affect specific suppliers or pipelines. CNEG utilizes load profiles for specific types of customers as modified by weather to support its gas acquisition and management efforts.

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#: 1712320
Filing Type: FOREIGN LIMITED LIABILITY COMPANY
Original Filing Date: 07/10/2007
Location: --
Business Name: CONSTELLATION NEWENERGY - GAS DIVISION, LLC
Status: Active
Exp. Date: -

Agent/Registrant Information

CORPORATE CREATIONS NETWORK, INC.
 119 E. COURT STREET
 CINCINNATI OH 45202
 09/24/2012
 Active

Filings

Filing Type	Date of Filing	Document ID
REGISTRATION OF FOREIGN LIMITED LIABILITY CO	07/10/2007	200719200290
SUBSEQUENT AGENT APPOINT/LIMITED/LIABILTY/PARTNERS	09/24/2012	201226901509

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.



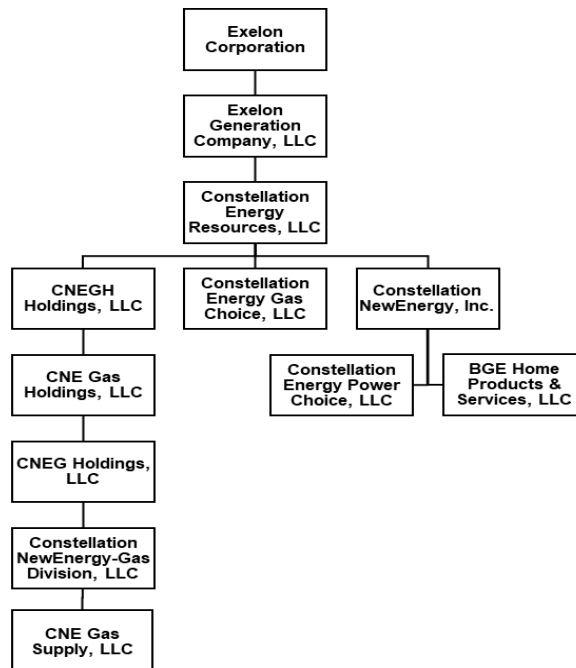
Witness my hand and the seal of the Secretary of State at Columbus, Ohio this 25th of May, A.D. 2021

Ohio Secretary of State



C-8 Exhibit C-8 “Corporate Structure” provide a graphical description of the applicant’s corporate structure. Do not provide an internal organizational chart. The graphical depiction should include all parent holding companies, subsidiaries and affiliated 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 they are a stand-alone entity with no affiliate or subsidiary companies.

Constellation NewEnergy – Gas Division, LLC is a wholly owned direct subsidiary of Constellation Energy Resources, LLC, which is a wholly owned direct subsidiary of Exelon Generation Company, LLC which is a wholly owned direct subsidiary of Exelon Corporation (“Exelon”). See chart below.



Regulated electricity or natural gas utility affiliates:

Atlantic City Electric (New Jersey)
 Baltimore Gas & Electric Company (Maryland)
 Commonwealth Edison (Illinois)
 Delmarva Power (Delaware and Maryland)
 PECO Energy Company (Pennsylvania)
 Pepco (District of Columbia, Maryland)

Affiliates other than a regulated electricity or natural gas utility engaged in the retail or wholesale supply of electricity or natural gas:

BGE Home Products and Services, LLC
 Constellation Energy Commodities Group Maine LLC
 Constellation Energy Gas Choice, LLC
 Constellation Energy Power Choice, LLC
 Constellation NewEnergy, Inc.
 Exelon Generation Company, LLC

D-2 Exhibit D-2 “Operations expertise and key technical personnel,” Provide evidence of the applicant’s experience and technical expertise in performing the operations described in this application. Include the names, titles, e-mail addresses, telephone numbers and background of key personnel involved in the operational aspects of the applicant’s business.

Constellation NewEnergy-Gas Division, LLC (CNEG) is comprised of professionals located in its headquarters in Louisville, KY and other regional offices throughout the U.S. CNEG’s management has significant experience in the natural gas market and intimate knowledge of the day to day operations of an energy management company. CNEG shares responsibilities for scheduling, nominating, and balancing their customers’ natural gas supplies and related needs. CNEG works with pipelines and negotiates with local utilities, to perform ongoing volume and balancing management. CNEG develops supply portfolios to serve its large commercial and industrial customers that are sufficiently diverse and flexible to handle supply disruptions that affect specific suppliers or pipelines. CNEG utilizes load profiles for specific types of customers as modified by weather to support its gas acquisition and management efforts. CNEG has been licensed Ohio Competitive Retail Natural Gas Supplier since July 2009.

Mark Huston – Senior VP, Exelon Corporation, Head of Retail, Constellation
Mark.Huston@constellation.com / 410-470-2846

A 30-year veteran of the energy utility industry, Mr. Huston oversees Constellation’s industry leading retail energy business and is responsible for marketing, sales, operations, fulfillment and product development of energy solutions in support of commercial, industrial and residential customers.

Mr. Huston has overseen the development of Constellation’s retail business into a national leader offering customers a range of solutions to manage energy related costs over time. He has been a leader in the retail business since 2006 and led a series of acquisitions which became the foundation for Constellation’s retail business including AES NewEnergy, Alliance Energy Services, Kaztex Energy Management, Blackhawk Energy Services, StarTex Power, MXenergy, ONEOK Energy Marketing, Integrys Energy Services, and ConEdison Solutions.

Mr. Huston’s prior leadership positions at Constellation include: Co-President of Customer Supply overseeing competitive retail and wholesale businesses; VP of Electric Transmission & Distribution for BGE overseeing the design, engineering, construction and operations for the utility’s electric system; VP Corporate Strategy & Development overseeing strategy and acquisitions. Huston began his Constellation career as a summer student/scholarship recipient in 1981 and worked as a co-operative engineering student until joining the company full time in 1986.

Huston received a bachelor’s degree in mechanical engineering under the co-operative education program from the University of Maryland, College Park and a master’s degree in applied management from the University of Maryland, University College.

Leonardo Caro – Senior Vice President
Dino.caro@constellation.com / 779-231-1905

Mr. Caro is responsible for Constellation's sales of natural gas to more than 100,000 commercial and industrial customers, and supports sales of the full range of Constellation products including power, energy efficiency, and on-site generation.

Mr. Caro joined Constellation in connection with its acquisition of Integrys Energy Services, Inc. where he oversaw direct mass market and C&I sales, marketing, account management and channel partner management as senior vice president. He joined Integrys in 2002 in a structuring and valuation role where he created the models used to price and hedge retail electric products, and assisted in the company's expansion into Michigan, New York, the Mid-Atlantic, Illinois and Texas.

Prior to joining Integrys, Mr. Caro worked in forecasting, scheduling, supply acquisition and risk management for Westcoast Energy. There, he helped launch Union Energy, an unregulated affiliated gas marketing company, and oversaw all supply-related issues required to source and deliver gas to residential and small commercial customers in Ontario, Canada. He also held leadership positions at Engage Energy, another unregulated affiliate of Westcoast Energy, where he was responsible for the structuring and valuation of large wholesale power and gas transactions.

Mr. Caro received a Bachelor of Applied Science degree in Mechanical Engineering from the University of Windsor (Windsor, ON) in 1991 and a Masters of Business Administration also from the University of Windsor in 1997. He is a registered Professional Engineer in the Province of Ontario.

Alison Quigg- Manager, Sales Support, Great Lakes
Alison.quigg@constellation.com / 734-761-2270

Alison joined Constellation through the Integrys merger. She is currently the Manager of Sales Support for the Great Lakes Region. In this role she is responsible for the sales support team, including the set-up of deals along with renewals within a certain size range. She is also the team lead for system transformation; including making sure information is relayed down to all team members. Alison works together with cross functional teams to standardize and implement best practices and confirm the team has a full understanding of the various functional areas that support customers and impact the customer's experience. Alison ensures direct reports are focused on those processes that will maintain and increase throughput and accuracy as it relates to prospecting activities.

Alison joined Integrys Energy Services (IES) in June 2000. Alison started as a pricing analyst for Michigan. She continued on the pricing desk and added Ohio and the New England region (CT, MA, ME, NH and RI). She then moved to the Regional Pricing Leader in 2006 for both the Great Lakes and New England regions, which earned her Regional Operational Leader (ROL) for New England in 2009. As the ROL, Alison developed an expert level of understanding of the LDC's, ISO's, as well as the accountability of timeliness and accuracy of invoicing for that region. In 2012, Alison moved into the Account Management department where she provides direction and support to ensure contracts and confirmations are accurately prepared along with getting all needed information into our systems for both pricing and billing. In this position she is

responsible for the development, coaching and motivation of the Account Management Pre Deal Team.

In addition to the above mentioned responsibilities, Ms. Quigg played a dual role coordinating the transfer of IES customer care items to the care team in Houston. Alison demonstrates a sound knowledge of details contained within customer proposals or contracts, understand the products and services offered by the company and supports day to day processes and activities in assigned markets with an emphasis on meeting and exceeding customer and Sales expectations. Alison holds a Bachelor of Business Administration.

Amy Klaviter – Senior Analyst, Legal Compliance

Amy.Klaviter@constellation.com / 312-681-1855

Ms. Klaviter began her career at Peoples Energy Services in July 1999 as an Account Analyst with Gas Nominations learning the tariffs and balancing pools. After a short time as an Account Analyst, Ms. Klaviter moved to the Gas Billing team working on reconciling account balances, daily billing activities, implementing a new system, addressing customers' issues and streamlining processes. In late 2001, Ms. Klaviter accepted the role of Electric Billing Specialist. Her primary responsibilities included daily billing activities, reconciling account balances and publishing monthly unbilled lists. She also assisted in training new employees on the electric market. Ms. Klaviter accepted the role of Market Analyst in 2004. Her focus was on completing all compliance filings in IL, MI, OH and NY, researching any requirements for new market entry and completing new market registrations. During that time, she became very familiar with the intricacies of each of the markets, specifically their rules and requirements. Upon the merger with WPS Energy Services to create Integrys Energy Services in 2007, Ms. Klaviter became a Regulatory Compliance Analyst that expanded the area of filings and requirements to the entire Integrys footprint and included completing registration for new markets. In 2015, Ms. Klaviter became a Legal Compliance Analyst as the Integrys business was acquired by Exelon. Ms. Klaviter oversees all retail electric filings. In 2018, Ms. Klaviter took over the retail natural gas filings in addition to the electric filings and became a Senior Analyst. Ms. Klaviter received her Bachelors degree in Finance from Butler University.

Competitive Retail Natural Gas Service Affidavit

County of Jefferson :

State of Kentucky :

Joseph Kirwan, 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] Assistant Secretary
Signature of Affiant & Title

Sworn and subscribed before me this 28th day of May, 2021
Month Year

Andrea Whitaker Kullman
Signature of official administering oath

Andrea Whitaker Kullman, Notary Public
Print Name and Title ID: KY NP 6967

My commission expires on May 4, 2024

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/1/2021 5:44:11 PM

in

Case No(s). 09-0459-GA-CRS

Summary: In the Matter of the Application of Constellation NewEnergy-Gas Division LLC