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June 1, 2021

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

15-0874-GA-AGG

Re: **Integrity Energy, LTD.**
Natural Gas Broker License Renewal

To Whom It May Concern:

Enclosed please find an **Natural Gas Broker License Renewal** for our client, **Integrity Energy, LTD.** Once the application has been processed, please forward evidence of approval to the mailing address on the renewal application. If there is any issue, or if you require any further information, please do not hesitate to contact us.

Thank you,

LicenseLogix
140 Grand Street, Suite 300
White Plains, NY 10601
renewals@licenselogix.com
(800) 292-0909

PUCO

2021 JUN -2 PM 1:21

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Public Utilities Commission

Competitive Retail Natural Gas Service
(CRNGS) Provider Application

Case Number: 15 4446 -GA- AGG

Please complete all information. Identify all attachments with a label and title (example: Exhibit C-2 Financial Statements). For paper filing, you can mail the original and two complete copies to the Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus, Ohio 43215-3793.

A. Application Information

A-1. Provider Type.

Select the competitive retail natural gas service (CRNGS) provider type(s) for which the applicant is seeking certification. Please note you can select more than one.

Retail Natural Gas Aggregator

☐

Retail Natural Gas Broker

☒

Retail Natural Gas Marketer

☐

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

Provide the name and contact information of the business entity.

Legal Name: Integrity Energy, LTD
Street Address: 5711 Grant Ave
City: Cleveland State: OH Zip: 44105
Telephone: (216) 502-4410 Website: www.integenergy.com

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: Integrity Energy
Street Address: 5711 Grant Ave
City: Cleveland State: OH Zip: 44105
Telephone: (216) 502-4410 Email: pnero@integenergy.com

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

Provide all business names the applicant uses in North America. You do not need to include the names provided in A-2 and A-3.

Name(s): Integrity Energy

A-5. Contact person for regulatory matters.

Name: Paul Nero Title: CEO
Street Address: 5711 Grant Ave
City: Cleveland State: OH Zip: 44105
Telephone: (216) 502-4410 Email: pnero@integenergy.com

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

Name: Paul Nero Title: CEO
Street Address: 5711 Grant Ave
City: Cleveland State: OH Zip: 44105
Telephone: (216) 502-4410 Email: pnero@integenergy.com

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

Street Address: 5711 Grant Ave
City: Cleveland State: OH Zip: 44105
Toll-free Telephone: 1-888-737-0590 Email: pnero@integenergy.com

A-8. Applicant's federal employer identification number.

FEIN: 27-2217792

A-9. Applicant's form of ownership (select one).

Sole Proprietorship <input type="checkbox"/>	Limited Liability Partnership (LLP) <input type="checkbox"/>	Corporation <input checked="" type="checkbox"/>	Partnership <input type="checkbox"/>
Limited Liability Company (LLC) <input type="checkbox"/>	Other: _____		

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 <input checked="" type="checkbox"/>	Dominion Energy Ohio <input checked="" type="checkbox"/>	Duke Energy Ohio <input checked="" type="checkbox"/>	Vectren Energy Delivery of Ohio <input checked="" type="checkbox"/>
-------------------------------------------------------------	-------------------------------------------------------------	---------------------------------------------------------	------------------------------------------------------------------------

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.

Date: _____

A-12. Principal officers, directors and partners.

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

A-13. Company history.

Provide an attachment with a concise description of the applicant's company history and principal business interests.

A-14. Secretary of State.

Provide evidence that the applicant is currently registered with the Ohio Secretary of State.

A-15. Proof of Ohio office and employee.

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.

Name: _____ Title: _____

Street Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Email: _____

B. Managerial Capability

Provide a response or attachment for each of the sections below.

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.

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.

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.

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? If yes, attach a document detailing the information.

Yes

☐

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? If yes, attach a document detailing the information.

Yes

☐

No

☒

C. Financial Capability

Provide a response or attachment for each of the sections below.

C-1. Financial reporting.

Provide a current link to the most recent Form 10-K filed with the Securities and Exchange Commission (SEC) or attach a copy of 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.

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.

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.

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".

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.

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? If yes, attach a document detailing the information.

Applicant

Parent company of the applicant

Affiliate company that guarantees the financial obligations of the applicant

Any owner or officer of the applicant

Yes

☐

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? If yes, attach a document detailing the information.

Yes

☐

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.

C-9. Financial arrangements.

This section is only applicable if power marketer or retail electric generation provider has been selected in A-1.

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).

D. Technical Capability

Provide an attachment for each of the sections below.

D-1. Operations.

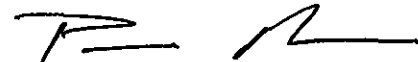
Retail natural gas brokers/aggregators: Include details of the applicant's business operations and plans for arranging and/or aggregating for the supply of natural gas to retail customers.

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.

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.

As authorized representative for the above company/organization, I certify that all the information contained in this application is true, accurate and complete. I also understand that failure to report completely and accurately may result in penalties or other legal actions.



Signature



Date

CEO

Title

Competitive Retail Natural Gas Service Affidavit

County of Summit :

State of Ohio :

PAUL NERO

, 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.

PAUL NERO CEO
Signature of Affiant & Title

Sworn and subscribed before me this 23rd day of May
Month 2021

Elizabeth Rayl
Signature of official administering oath



Elizabeth Rayl, Notary
Print Name and Title

Elizabeth Rayl
Notary Public
In and For the State of Ohio
Recorded in Summit County
My Commission Expires
February 5, 2023

My commission expires on 02/05/2023

Exhibit A-12 “Principal Officers, Directors & Partners” provide the names, titles, addresses and telephone numbers of the applicant’s principal officers, directors, partners, or other similar officials.

Paul Nero
Integrity Energy
C.E.O.
5711 Grant Ave
Cleveland Ohio 44105
216-502-4410
pnero@integenergy.com

Mike Naughton
Integrity Energy
President
5711 Grant Ave
Cleveland Ohio 44105
216-502-4409
Mnaughton@integenergy.com

Exhibit A-13 “Company History” Provide an attachment with a concise description of the applicant’s company history and principal business interests.

Integrity Communications was formed in May 2002 with the sole intention of promoting SBC network based services to commercial accounts. We strived to offer reliable telecommunication services that are competitively priced with one point of contact for sales and customer service. Since our inception in 2002 Integrity Communications has performed far above all expectations set forth by SBC/AT&T. Our company started with a single office in Cleveland Ohio and 5 employees, today we own a 36,000 square foot building and have grown to approximately 100 employees.

In May of 2008 Integrity was approached by a top 5 alternative supplier to offer their services to the small and medium sized choice customers. We started our energy campaign in Ohio and sold natural gas for the first 6 month’s. Since then we have branched out into multiple states and offer electricity as well. Integrity Energy was created and has also gained one additional alternative supplier as a client and currently sells for them both. We have highly trained, professional, and sophisticated employee’s that contact commercial accounts and have the ability to offer them a choice in their electricity supplier.

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

I, Frank LaRose, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show INTEGRITY ENERGY, LTD., an Ohio For Profit Limited Liability Company, Registration Number 1923765, was organized within the State of Ohio on March 19, 2010, is currently in FULL FORCE AND EFFECT upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 26th day of March, A.D. 2021.*

A handwritten signature in cursive script, appearing to read "Frank LaRose".

Ohio Secretary of State

Validation Number: 202108502706

Exhibit B-1 “Jurisdictions of Operation” provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail or wholesale electric service including aggregation services.

Integrity Energy is licensed and provides energy consulting services in the following states:

Connecticut (license # 10-04-18)

Massachusetts (license # EB-164)

Maine (license # 2010-315)

Rhode Island (License # D-96-6)

Pennsylvania (license # A-2010-2175245)

Illinois (license # 10-0425)

Maryland (license # IR-1985)

Ohio (license # 11-339E)

Exhibit B-2 “Experience & Plans” provide a description of the applicant’s experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with the Commission rules adopted pursuant to Section 4928.10 of the Revised Code.

Integrity Energy is currently working with multiple suppliers in many different jurisdictions. Integrity Energy does not take title to the power and solely provides consulting, brokering, and energy planning services. Integrity works with 14 - 16 different suppliers to contract power for a specific customer. We have successfully enrolled over 4,000 commercial and Industrial accounts with competitive energy suppliers.

The contracts that are signed by the customer are from the supplier directly and not Integrity. All contracted services and billing statements come directly from the specific supplier that the customer chooses. Customer inquiries, questions, concerns, or complaints will be handled from our office or the supplier depending on which route the customer takes. All contact information is provided to every customer after the completion of a contract signed.

Exhibit B-3 “Disclosure of Liabilities and Investigations”

Integrity Energy does not have any judgments, liabilities, or rulings that are pending nor have there been any in the past.

Exhibit C-1 “SEC Filings”

Integrity Energy is not required to file with the SEC.

Exhibit C-2 “Financial Statements,”

Integrity Energy is owner managed. The financial statements are not audited, but are reviewed by our outside accountants. The owners Paul Nero and Mike Naughton certify that the following 6 pages that detail our financial statements are accurate. Please keep these confidential.

Exhibit 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.

C-3 Forecasted Financial Statement

Integrity Energy Forecasted Financial Statement

January - December 2021

Total Income	\$ 4,250,000.00
Total Expenses	<u>\$ 2,250,000.00</u>
Net Income	\$ 2,000,000.00

January - December 2022

Total Income	\$ 5,000,000.00
Total Expenses	<u>\$ 2,750,000.00</u>
Net Income	\$ 2,250,000.00

C-3 Forecasted Financial Statement

Integrity Energy Forecasted Financial Statement

January - December 2021

Total Income	\$ 4,250,000.00
Total Expenses	<u>\$ 2,250,000.00</u>
Net Income	\$ 2,000,000.00

January - December 2022

Total Income	\$ 5,000,000.00
Total Expenses	<u>\$ 2,750,000.00</u>
Net Income	\$ 2,250,000.00

Exhibit C-4 “Credit Rating,” provide a statement disclosing the applicant’s credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody’s Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant’s parent or affiliate organization that guarantees the obligations of the applicant.

Integrity Energy is a start-up company therefore no credit rating exists from any of the above agencies.

Exhibit C-6 “Bankruptcy Information,” provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.

Integrity Energy has not been through any type of reorganization nor has it ever filed for bankruptcy protection.

Exhibit C-7 “Merger Information,” provide a statement describing any dissolution or merger or acquisition of the applicant within the five most recent years preceding the application.

Integrity Energy has not gone through any type of dissolution, merger, or acquisition.

Exhibit C-8 “Corporate Structure” provide a description of the applicant’s corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers and companies that aggregate 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.

Integrity Energy is an Ohio corporation that does not have any affiliations or subsidiary companies that supply retail or wholesale electricity or natural gas to customers that aggregate customers in North America.

Exhibit D-1 & D-2 “Operations, Expertise and Key Technical Personnel”

Power brokers/aggregators: Include details of the applicant’s business operations and plans for arranging and/or aggregating for the supply of electricity to retail customers.

Provide evidence of the applicant’s experience and technical expertise in performing the operations described in this application.

Integrity Communications was formed in May 2002 with the sole intention of promoting SBC network based services to commercial accounts. We strived to offer reliable telecommunication services that are competitively priced with one point of contact for sales and customer service.

In May of 2008 Integrity was approached by a top 5 alternative supplier to offer their services to the small and medium sized choice customers. We started our energy campaign in Ohio and sold natural gas for the first 6 month’s. Since then we have branched out into multiple states and offer electricity as well. Integrity Energy was created and has also gained one additional alternative supplier as a client and currently sells for them both. We have highly trained, professional, and sophisticated employee’s that contact commercial accounts and have the ability to offer them a choice in their electricity supplier.

Integrity Energy Org Chart

