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2022 MAR 30 PM 12:11
PUCO

March 28, 2022

VIA PRIORITY MAIL

Public Utilities Commission of Ohio
Docketing Division
11th Floor
180 East Broad St.
Columbus, Ohio 43215-3793

RE: Renewal Application of Independent Energy Consultants, Inc. for Certification as a Competitive Retail Natural Gas Broker and Aggregator, and Motion for Protective Order Case No. 04-593-GA-AGG

Enclosed please find an original and two (2) copies of the Renewal Application of Independent Energy Consultants, Inc. for Certification as a Competitive Retail Natural Gas Broker and Aggregator.

Also included is an original and two (2) copies of Independent Energy Consultant's Motion for Protective Order regarding Sections C-2 and C-3 of the Application. The information responding to Sections C-2 and C-3 is stamped confidential and is contained in a single sealed envelope also marked confidential.

Please feel free to call me at (330) 436-8910 if you have any questions. Thank you for your assistance.

Very truly yours,


David J. Hrina

Enclosures

4895-1478-9912, v. 1

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Technician 302 Date Processed 3.30.22



Public Utilities Commission

Competitive Retail Natural Gas Service
(CRNGS) Provider Application

Case Number: 04 - 0593 - 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: Independent Energy Consultants, Inc.
Street Address: 215 W Garfield Road, Suite 210
City: Aurora State: Ohio Zip: 44202
Telephone: 330.995.2675 Website: www.naturalgas-electric.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: Independent Energy Consultants, Inc.
Street Address: 215 W Garfield Road, Suite 210
City: Aurora State: Ohio Zip: 44202
Telephone: 330.995.2675 Email: info@naturalgas-electric.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): Independent Energy Consultants, Inc.

A-5. Contact person for regulatory matters.

Name: Eric Burns Title: Director, Aggregation & Sales
Street Address: 215 W Garfield Road, Suite 210
City: Aurora State: Ohio Zip: 44202
Telephone: 330.995.2675 Email: eburns@naturalgas-electric.com

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

Name: Eric Burns Title: Director, Aggregation & Sales
Street Address: 215 W Garfield Road, Suite 210
City: Aurora State: Ohio Zip: 44202
Telephone: 330.995.2675 Email: eburns@naturalgas-electric.com

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

Street Address: 215 W Garfield Road, Suite 210
City: Aurora State: Ohio Zip: 44202
Toll-free Telephone: 888.862.6060 Email: info@naturalgas-electric.com

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

FEIN: 20-0989144

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:

CenterPoint Energy Ohio <input checked="" type="checkbox"/>	Columbis Gas of Ohio <input checked="" type="checkbox"/>	Dominion Energy Ohio <input checked="" type="checkbox"/>	Duke Energy Ohio <input checked="" type="checkbox"/>
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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: 04/08/2004

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: Eric Burns Title: Director, Aggregation & Sales
Street Address: 215 W Garfield Road, Suite 210
City: Aurora State: Ohio Zip: 44202
Telephone: 330.995.2675 Email: eburns@naturalgas-electric.com

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.

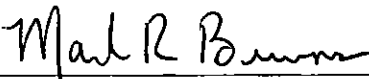
Retail natural gas brokers/aggregators: Include details of the applicant's business operations and plans for arranging and/or aggregating for the supply of natural gas to retail customers.

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. If vendors or third parties are or will be utilized for any activities listed in this application, provide the name and contact information for each and list which activities they will perform. Also indicate which activities will be performed directly by the company. Please note that this information is required to be updated within 30 days of any changes.

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

3-17-2022
Date

President

Title

Competitive Retail Natural Gas Service Affidavit

County of Portage :

State of Ohio :

Mark R Burns, 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.

Mark R Burns, PRESIDENT
Signature of Affiant & Title

Sworn and subscribed before me this

Renee L Miller
Signature of official administering oath



March, 2022
Month Year

Renee L Miller Notary
Print Name and Title

My commission expires on 12-4-22

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

Officers

Mark R. Burns, President
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns, Vice President
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns, Treasurer
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns, Secretary
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Directors

Mark R. Burns
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Regina M. Burns
215 W Garfield Road Suite 210
Aurora, Ohio 44202
(330) 995-2675

Exhibit A-13 "Company History"

Independent Energy Consultants, Inc. incorporated in the State of Ohio in April 2004 and was certified as a broker and aggregator of both natural gas and electric by the Public Utilities Commission of Ohio on May 23, 2004. The Virginia State Corporation Commission similarly licensed them as brokers and aggregators of natural gas and electricity on June 11, 2004. The State of Texas has also registered them as an aggregator and broker of electricity on June 27, 2007. The State of Illinois licensed them as an Agent/Broker/Consultant on July 18, 2011. The State of Pennsylvania licensed them as a broker/marketer on November 14, 2019. The State of Maryland licensed them to broker electricity and natural gas on May 6, 2020 and May 13, 2020, respectively.

Independent Energy Consultants is actively engaged in the design, development and ongoing support of Government Aggregation programs in Ohio. The founder of Independent Energy Consultants, Inc. helped establish the first Governmental Aggregation programs in Ohio, and has led the design, implementation and administration of many opt-out Governmental Aggregation Programs that currently impact over 100 communities.

Independent Energy Consultants, Inc. has also brokered deals for Commercial and Industrial natural gas customers and is very familiar with the PUCO rules and tariffs for each Ohio LDC.

Independent Energy Consultants' staff consists of multiple Certified Energy Managers (CEMs), and Certified Energy Procurement Professionals (CEPs).

Independent Energy Consultants, Inc. is well versed in the analysis of utility tariffs and has provided utility bill auditing services in Ohio and throughout the United States.

Independent Energy Consultants, Inc. staff members are Certified Energy Managers (CEM) and provide energy audits and energy efficiency consulting services to commercial, industrial and governmental entities.

The principals have no other business interests.

Exhibit A-14 "Secretary of State"

Independent Energy Consultants, Inc. remains registered with the Secretary of State under Charter/Registration number 1454632.

200409803290

DATE:	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
04/08/2004	200409803290	DOMESTIC ARTICLES/FOR PROFIT (ARF)	125.00	100.00	.00	.00	.00

Receipt

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

HARRINGTON HOPPE & MITCHELL, L.TD.
26 MARKET ST
SUITE 1200
YOUNGSTOWN, OH 44503

STATE OF OHIO	
CERTIFICATE	
Ohio Secretary of State, J. Kenneth Blackwell	
1454632	
It is hereby certified that the Secretary of State of Ohio has custody of the business records for	
INDEPENDENT ENERGY CONSULTANTS, INC.	
and, that said business records show the filing and recording of:	
Document(s):	Document No(s):
DOMESTIC ARTICLES/FOR PROFIT	200409803290
	Witness my hand and the seal of the Secretary of State at Columbus, Ohio this 7th day of April, A.D. 2004.
United States of America State of Ohio Office of the Secretary of State	 Ohio Secretary of State

Exhibit B-1 “Jurisdictions of Operation”

Independent Energy Consultants, Inc. is certified by the Public Utilities Commission of Ohio to provide brokerage and aggregation services of natural gas and electricity throughout all deregulated areas of Ohio. They are similarly licensed in:

- Illinois by the Illinois Commerce Commission as an Agent/Broker/Consultant,
- Virginia by the Virginia State Corporation Commission to provide Brokerage and Aggregation services of natural gas and electricity, and
- The Public Utilities Commission of Texas as an Aggregator and Broker of electricity.
- Pennsylvania by the Pennsylvania Public Utility Commission as a broker/marketer of electricity and natural gas.
- Maryland by the Public Service Commission as Broker and Aggregator of electricity and natural gas.

Exhibit B-2 "Experience & Plans"

Contract Services: With the aid of its legal counsel, Independent Energy Consultants, Inc. has developed a standard professional services agreement that it will use with its clients. It will also use the respective commodity suppliers' "Independent Agent Agreements" when brokering deals between suppliers and commercial and industrial customers.

Billing Statements: Independent Energy Consultants, Inc. brokers energy contracts for Commercial and Industrial customers and designs and implements Governmental Aggregation programs. In the process it never takes title to electricity, so there is no billing for the commodity. Independent Energy Consultants does provide invoices to its clients for consulting services rendered using a commercially available accounting system.

Customer Service Experience: Independent Energy Consultants, Inc. is currently administering Electric and/or Natural Gas Governmental Aggregation programs that impact a combination of over 100 Ohio communities. Independent Energy Consultants also provides brokerage service to many commercial and industrial customers outside of aggregation programs. Most questions and calls were answered immediately, and all were responded to within 24 hours of receipt. Customer service often came in the form of assisting residents who had contacted their local government and/or Choice supplier and who still had questions or disputes.

Frequent communication with and detailed quarterly reports to governmental aggregators was used as a customer service technique to head off problems before they arose. This involved training of municipal personnel and preparation of material such as Frequently Asked Questions (FAQs), press releases and conducting informational town hall meetings.

Customer Complaints and Inquiries: Independent Energy Consultants, Inc. has helped facilitate the resolution of numerous customer complaints. Virtually all of the questions and complaints, however, concerned matters involving the local utility and/or the supplier of choice.

Inquiries directed to Independent Energy Consultants, Inc. usually pertain to the customers seeking advice on the aggregation process, deciding whether or not to accept an offer, help understanding utility bills, etc.

Customer complaints or inquiries can be made in a number of ways. Customers may contact Independent Energy Consultants, Inc. by:

- Calling the direct number: (330) 995-2675
- Calling the toll free number: (888) 862-6060
- Sending a fax: (800) 574-4508
- Sending an e-mail: eburns@naturalgas-electric.com;

- Contact via the Independent Energy Consultants website: info@naturalgas-electric.com

Since the onset of deregulation in Ohio, the founder of Independent Energy Consultants, Inc. has led the development and administration of many government aggregation programs that serve many communities. Independent Energy Consultants has designed implemented and administered hundreds of aggregation programs across Ohio. The cumulative total of these groups represents over 350,000 residential customers and tens of thousands of commercial customers.

Exhibit B-3 "Disclosure of Liabilities and Investigations"

Neither Independent Energy Consultants, Inc. nor any of its employees have ever had a judgment, investigation, or ruling against it. There are no circumstances that would financially or operationally impact its ability to perform the brokerage and aggregation service for which it seeks recertification.

Exhibit C-1 "Financial Reporting"

Independent Energy Consultants, Inc. is a privately held corporation, and as such, does not produce or file 10-K/8-K, 10-Q, etc., Reports with the Securities Exchange Commission.

Exhibit C-2 “Financial Statements”

Independent Energy Consultants, Inc. has filed this information separately Under Seal.

Exhibit C-3 “Forecasted Financial Statements”

Independent Energy Consultants, Inc. has filed this information separately Under Seal.

Exhibit C-4 “Credit Rating”

As a privately held S Corporation, Independent Energy Consultants, Inc. does not possess a published credit rating.

Exhibit C-5 "Credit Report"

The credit report for Independent Energy Consultants, Inc. as provided by Experian is provided on the following two pages.

Independent Energy Consultants, Inc. and the company owners possess an unblemished corporate and personal credit history.

CreditScoreSM Report

as of: 03/08/22 08:58 ET

Independent Energy Consultants, Inc

Address: 215 W Garfield Rd Ste 210
Aurora, OH 44202-8849
United States

Phone: 330-995-2675

Website: naturalgas-electric.com

Experian BIN: 750177526

Agent: C T Corporation System

Agent Address: 4701 Cox RD Ste 285
Glen Allen, VA

Key Personnel: President: Mark R Burns
Vice President: Regina M Burns
Owner: .

SIC Code: 8742-Management Consulting Services
9121-Legislative Bodies
8748-Business Consulting Services, Nec

NAICS Code: 541612-Human Resources Consulting Services
541611-Administrative Management And General Management Consulting Services
921120-Legislative Bodies

Business Type: Corporation

Experian File Established: April 2004

Experian Years on File: 18 Years

Years in Business: 18 Years

Total Employees: 1

Sales: \$113,000

Filing Data Provided by: Ohio

Date of Incorporation: 05/14/2004

Experian Business Credit Score

95
Business
Credit Score



Low Risk

The objective of the Experian Business Credit Score is to predict payment behavior. High Risk means that there is a significant probability of delinquent payment. Low Risk means that there is a good probability of on-time payment.

Key Score Factors:

- Number of recently active commercial accounts.
- Length of time on Experian's file.
- Ratio of total bal to total high bal across all comm acct.

Business Credit Scores range from a low of 1 to high of 100 with this company receiving a score of 95. Higher scores indicate lower risk. This score predicts the likelihood of serious credit delinquencies within the next 12 months. This score uses tradeline and collections information, public filings as well as other variables to predict future risk.

2

**Financial
Stability Risk
Rating**



Low-Medium Risk

A Financial Stability Risk Rating of 2 indicates a 1.11% potential risk of severe financial distress within the next 12 months.

Key Rating Factors:

- Number of active commercial accounts.
- Risk associated with the company's industry sector.
- Risk associated with the business type.
- Employee size of business.

Financial Stability Risk Ratings range from a low of 1 to high of 5 with this company receiving a rating of 2. Lower ratings indicate lower risk. Experian categorizes all businesses to fit within one of the five risk segments. This rating predicts the likelihood of payment default and/or bankruptcy within the next 12 months. This rating uses tradeline and collections information, public filings as well as other variables to predict future risk.

Credit Summary

This location does not yet have an estimated Days Beyond Terms (DBT), or a Payment Trend Indicator. This is often the result of too few Payment Tradelines.

Lowest 6 Month Balance: \$951
Highest 6 Month Balance: \$3,566
Current Total Account Balance: \$0
Highest Credit Amount Extended: \$0

Payment Tradelines: 1

UCC Filings: 0

✓ **Businesses Scoring Worse:** 94%

✓ **Bankruptcies:** 0

✓ **Liens:** 0

✓ **Judgments Filed:** 0

✓ **Collections:** 0

* The information herein is furnished in confidence for your exclusive use for legitimate business purposes and shall not be reproduced, disclosed, or shared to any third party per the restrictions in the Terms and Conditions that you accepted. Neither Experian nor its sources or distributors warrant such information nor shall they be liable for your use or reliance upon

It. (Ref# 502234)

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Exhibit C-8 “Corporate Structure”

Independent Energy Consultants, Inc. is a stand-alone entity with no affiliate or subsidiary companies.

Exhibit D-1 “Operations”

As a broker and aggregator Independent Energy Consultants, Inc. targets its consulting services to two types of clients; Governmental Aggregators, and Commercial and Industrial customers. For Governmental Aggregators, Independent Energy Consultants, Inc. provides from start to finish all of the steps needed to design, implement and administer a program. Those steps will include but not be limited to:

- Assisting a community in preparing and filing an ordinance to put the opt-out aggregation issue on the ballot;
- Draft a Plan of Operation and Governance;
- Assist with the completion and filing of client's PUCO Certification Application;
- Conduct Public Hearings;
- Prepare Request for Proposal (RFP);
- Analyze supplier bids and make recommendations to community leaders;
- Review of Supplier Agreements;
- Design Opt-Out Notification Forms;
- Identify Eligible Customers through various data scrubbing techniques;
- Assist with the Customer Switching Process;
- Provide ongoing assistance during the life of the program;
- Prepare client's quarterly and annual reports to the PUCO;
- Prepare quarterly reports to community leaders to track progress; and
- Keep clients aware of any utility and/or regulatory changes that could impact their program.

For commercial and industrial customers, Independent Energy Consultants, Inc. provides among other things:

- Gather and analyze client's load data;
- Analyze for proper rate code classification;
- Prepare and issue a customized RFP to all qualified suppliers;
- Negotiate with suppliers;
- Assist in the completion of Supplier and LDC contract paperwork;
- Assist in the customer switching process;
- Audit bills;
- Provide ongoing client support during the term of the agreement.

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

Independent Energy Consultants, Inc. provides consulting services to assist customers in making wise decisions concerning their natural gas supply. It provides this advice for governmental aggregation buying groups and to individual commercial and industrial customers. In providing this service, the company at no time will own title to natural gas. It does not purchase natural gas for sale or resale.

Independent Energy Consultants, Inc. is very familiar with the Local Distribution Company Rules and PUCO regulations for doing business in Ohio's natural gas markets. As an aggregator and broker we have experience working with LDC forms and supplier contracts to effectively broker deals in Ohio's Choice programs and traditional Transportation programs.

Mr. Burns, and multiple members of the IEC staff, have experienced all stages of the customers support “life cycle” here in Ohio's natural gas markets. That life cycle includes, but is not limited to: (i) customer inquiry, (ii) customer acquisition, (iii) customer load data assembly and analysis, (iv) supplier negotiation and selection, (v) customer switching (vi) ongoing customer support and finally (vii) customer renewal.

Finally, Mr. Burns has provided Risk Management oversight to a \$1 billion electric and gas trading operation. He uses that experience to help clients understand and manage their risk exposure when making decisions concerning their natural gas purchase agreements.

Mark R. Burns
President
mburns@naturalgas-electric.com
(330) 995-2675 x304
(Resume attached)

Eric Burns
Operations Manager
eburns@naturalgas-electric.com
(330) 995-2675 x301
(Resume attached)

Rebecca Bergdorf
Senior Analyst
rbergdorf@naturalgas-electric.com
(330) 995-2675 x303
(Resume attached)

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

Mark R. Burns
President, Independent Energy Consultants, Inc.

Education:

- Master of Business Administration - Baldwin-Wallace College, 1993.
- Bachelor of Electrical Engineering Technology - Youngstown State University, 1982.
- 30+ years extensive training and professional development.

Certifications and Licenses:

- Public Utilities Commission of Ohio Electric Broker and Aggregator (04-116(8)).
- Public Utilities Commission of Ohio Natural Gas Broker and Aggregator (04-078(8)).
- Virginia State Corporation Commission Electric and Natural Gas Aggregator (A-17).
- Public Utilities Commission of Texas Aggregator Registration (80-252)
- Illinois Commerce Commission licensed Agent/Broker/Consultant
- Formerly licensed Senior Reactor Operator from the Nuclear Regulatory Commission (SOP-30781)
- Certified Energy Manager (CEM) – Association of Energy Engineers
- Certified Energy Procurement Professional (CEP) - Association of Energy Engineers
- Certified Thermographer
- Private Pilot

Experience:

- Owner & Founder of two successful energy consulting services companies.
- Possesses 30-years broad background experience in engineering and management in the Electric and Natural Gas industries.
- Expertise includes providing energy brokerage and aggregation services for governments, and commercial and industrial customers.
- Conduct facility energy audits and recommending efficiency projects.
- Utility tariff analysis and utility bill auditing.
- Operational, financial, and credit risk management.
- Designed, implemented and administered 100+ Governmental Aggregation Programs (natural gas and electric) since the deregulation of Ohio's utilities in 2001.
- Risk Control oversight of a \$1 Billion Gas and Electric trading group (FirstEnergy Corporation)
- Trained Company Spokesperson (Toledo Edison)
- Utility Company Strategic Planning Manager (Centerior Energy)
- Shift Manager Davis-Besse Nuclear Power Station (Toledo Edison)
- Instrument and Control Engineer Davis-Besse Nuclear Power Station (Toledo Edison)
- Electrical Test Engineer of Naval Nuclear Submarines (Newport News Shipbuilding)

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

Eric Burns, Director, Aggregation & Sales

Experience:

Independent Energy Consultants Inc.

Operations Manager

December 2016 - Present

- Prepare natural gas and electric price quotes for clients
- Analyze supplier bids and prepare decision support models for clients
- Responding to requests for proposals
- Maintain supplier relations
- Competitive market intelligence gathering and database maintenance
- Geocode customers lists to ensure accurate mailings Competitive market intelligence gathering and database maintenance
- Create and foster relationships with suppliers
- Oversee maintenance of pricing matrixes for U.S. deregulated energy markets
- Maintain company CRM system

Analyst

January 2009 - November 2016

- Basic intra-office accounting
- Audit accounts receivable
- Spreadsheet analysis

Nestle USA

External Collections Specialist

May 2016 - November 2016

- Reduce and manage accounts receivable portfolio of approximately \$25 million
- Support credit analyst in managing customer lines of credit

Education:

The University of Akron, College of Business Administration

2015

Bachelor of Business Administration in Corporate Financial Management

Skills /Licenses:

- Certified Energy Manager (CEM)
- Certified Energy Procurement (CEP) Professional
- Instrument Rated Private Pilot

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

Rebecca Bergdorf, Senior Analyst

Independent Energy Consultants, Inc.

Senior Analyst – responsibilities include:

Jan 2016 – present

- Maintain FileMaker Pro database of accounts
- Maintain database of supplier contacts
- Utility bill auditing
- Commission auditing
- Audit supplier's contracts for accuracy – rate, term, account numbers
- Maintain and analyze data in the EnergyCAP software
- Maintain general office functions as assigned by company president

Analyst - responsibilities include:

May 2012 - Dec 2016

- Utility bill auditing
- Commission auditing
- Maintain general office functions as assigned by company president

Parker Hannifin Corporation

Aug. 2011- April 2012

- Quality Control
- Warehousing

Chrysler Corporation – Twinsburg Stamping

1995 - 2010

- Auditing of bills
- Recording and analyzing data

Education and Training

- Bachelor of Education – University of Akron, 1999
- Microsoft Excel 2010 basics
- Natural Gas Market Fundamentals Training
- Electric Markets Fundamentals Training
- EnergyCAP Training – Energy Accounting and Utility Bill Auditing
- Business Writing for Results
- PJM Fundamentals Training
- Microsoft Excel 2010 Intermediate
- Mistake-free Grammar and Proof Reading
- Breaking Bad Communication Habits
- Communication skills for Women