

# Ohio | Public Utilities Commission

#### Competitive Retail Electric Service (CRES) **Provider Application**

Case Number: 18 \_0566 -EL-GAG

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 Util

#### A.

Application l	Information		
	pe. petitive retail electric service (CRI ease note you can select more th		the applicant is seeking
Aggregator	Power Broker	Power Marketer	Retail Electric Generation Provider
•			
A-2. Applicant's	legal name and contact informat	ion.	
Provide the nar	me and contact information of the	e business entity.	
Legal Name:	Strategic Aggregation (	Consultants, LLC	
Street Address:	3700 Massillon Road, S	Suite 341	
City:	Uniontown	State: OH	<sub>Zip:</sub> 44685
Telephone:	330-415-2268	Website: sac-save.co	om 😝 🚆
Provide the nar	contact information under which mes and contact information the an Ohio address and may be the	business entity will use for be same contact information giv	usiness in Ohio This does
Name:	Strategic Aggregation (	<del></del>	
Street Address:	3700 Massillon Road, S		44685: <b>4</b>
City:	Uniontown	State: OH	Zip: 44685 💆 🗧
Telephone:	330-415-2268	Website: sac-save.co	om
	er which the applicant does busir iness names the applicant uses in 2 and A-3.		need to include the names
Name(s):	Strategic Aggregation Consultants, LLC		
	s is to certify that the		

locument delivered in the regular course of huniper

A-5. Contact per	son for regulatory matters.	_		
Name:	Brenda Fargo	Title: Pr	Title: President	
Street Address:	3700 Massillon Roa	ad, Suite 341		
City:	Uniontown	State: OH	Zip: 44685	
Telephone:	330-415-2268		Email: bfargo.sac@gmail.com	
A-6. Contact per	son for PUCO Staff use in in	vestigating consumer comp	laints.	
Name:	Brenda Fargo	Title: PI	resident	
Street Address:	3700 Massillon Roa	ad, Suite 341		
City:	Uniontown	State: OH	Zip: 44685	
Telephone:	330-415-2268	Email: bfargo.sa		
A-7. Applicant's	address and toll-free number	er for customer service and	complaints.	
Street Address:	3700 Massillon Roa	ad, Suite 341		
City:	Uniontown	State: OH	<sub>Zip:</sub> 44685	
Toll-free Telephone:	330-415-2268		Email: bfargo.sac@gmail.com	
A-8. Applicant's	federal employer identifica	tion number.		
FEIN:	46-2155909			
A-9. Applicant's	form of ownership (select o	ne).		
Sole Proprieto	orship Limited Liabi Partnership (I	Corporation	n Partnership	
Limited Liab Company (I	Other	:		
A-10. Identify cu	rrent or proposed service a	reas.		
•	ervice area in which the app entify each customer class th		•	
Service area sele		_	<u></u>	
AES Ohio	American Electric (AEP Ohio	Duke Fnerov C	Phio FirstEnergy – Cleveland Electric Illuminating	

FirstEnergy - Ohio FirstEnergy - Toledo Edison Edison

#### Class of customer selection:

Commercial Industrial Mercantile Residential

#### A-11. Start Date.

Indicate the approximate start date the applicant began/will begin offering services.

Date: 07/01/2022

#### 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.

#### **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 ·
	<b>✓</b>

#### **B-6.** Environmental disclosure.

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

Provide a detailed description of how the applicant intends to determine its generation resource mix and environmental characteristics, including air emissions and radioactive waste. Include the annual projection methodology and the proposed approach to compiling the quarterly actual environmental disclosure data. See <u>4901:1-21-09</u> of the Ohio Administrative Code for additional details of this requirement.

# 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 forceditors or any other form of bankruptcy? If yes, Applicant Parent company of the applicant Affiliate company that guarantees the financial ob Any owner or officer of the applicant	attach a document detailing the information.
Yes	No
C-7. Merger information.	
Is the applicant currently involved in any dissolution participated in such activities within the previous information.	on, merger or acquisition activity, or otherwise 24 months? If yes, attach a document detailing the
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:

 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.

- 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.

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

<u>Power Marketers/Generators</u>: Describe the operational nature of the applicant's business, specifying whether operations will include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services, as well as other services used to arrange for the purchase and delivery of electricity to 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, 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.

#### D-3. FERC power marketer authorization.

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

Provide the FERC docket granting the applicant power marketer authority.

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

Bund Jarge	05/30/2022	
Signature	Date	
President		
Title		

# Competitive Retail Electric Service Affidavit

County of Summit	:
State of Ohio	<u>.:</u>
Brenda Fargo	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, gross earnings, and sales of kilowatt-hours of electricity pursuant to Sections 4905.10(A), 4911.18(A), and 4928.06(F), Ohio Revised Code.
- 3. The applicant will timely pay any assessment made pursuant to Sections 4905.10, 4911.18, and 4928.06(F), Ohio Revised Code.
- 4. The applicant will comply with all applicable rules and orders adopted by the Public Utilities Commission of Ohio pursuant to <u>Title 49</u>, Ohio Revised Code.
- 5. The 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. The applicant will fully comply with Section <u>4928.09</u>, Ohio Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
- 7. The applicant will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
- 8. The applicant will use its best efforts to verify that any entity with whom it has a contractual relationship to purchase power is in compliance with all applicable licensing requirements of the Federal Energy Regulatory Commission and the Public Utilities Commission of Ohio.
- 9. The applicant will cooperate fully with the Public Utilities Commission of Ohio, the electric distribution companies, the regional transmission entities, and other electric suppliers in the event of an emergency condition that may jeopardize the safety and reliability of the electric service in accordance with the emergency plans and other procedures as may be determined appropriate by the Commission.
- 10. If applicable to the service(s) the applicant will provide, it will adhere to the reliability standards of (1) the North American Electric Reliability Council (NERC), (2) the appropriate regional reliability council(s), and (3) the Public Utilities Commission of Ohio.
- 11. The 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.

	trate to the best of his/her knowledge, information, and belief and le to prove the same at any hearing hereof.
13. Affiant further sayeth naught.	•
Bund J. Faro, Francisco Signature of Affiant & Title	esident
Sworn and subscribed before me this 3157	day of $May$ , $2022$
Signature of official administering oath	Month Year  James Dudek, Branch  Print Name and Title Manager
$\setminus$	1 22 24

RIAL

My commission expires on 1-22-24

JAMIE L. DUDEK Notary Public, State of Ohio My Commission Expires 01-22-2024

# **Aggregation Consultants, LLC**

#### **EXHIBIT A-12**

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

Brenda Fargo, President, Member 3700 Massillon Rd., Suite 341 Uniontown, Ohio 44685

330-899-9960 (Office) 330-899-9969 (Fax)

Michael Fargo, Member 3700 Massillon Rd., Suite 341 Uniontown, Ohio 44685

330-899-9960 (Office) 330-899-9969 (Fax)

#### **EXHIBIT A-13**

#### Exhibit A-13 "Company History"

Strategic Aggregation Consultants, LLC was founded by Brenda Fargo in 2013 following 16 years with FirstEnergy Solutions (FES) to provide energy consulting services. During her tenure at FES, she was responsible for the 2001 creation and continued implementation of the electric aggregation program. Under her guidance, the FirstEnergy Solutions electric aggregation program grew to serve more than 2 million accounts in 450 Ohio and Illinois communities. She continues to use her expertise to assist communities with their decisions about the right CRES supplier for them.

#### **EXHIBIT A-14**

Exhibit A-14 "Secretary of State"

See attached



# **Aggregation Consultants, LLC**

Joc ID -->

201302501465



DOCUMENT ID DESCRIPTION DOMESTIC FOR PROFIT LLC - ARTICLES OF ORG (LCP)

EXPED PENALTY

Receipt

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

**BRENDA S. FARGO** STRATEGIC AGGREGATION CONSULTANTS, LLC 3538 SADDLEBORO DR. UNIONTOWN, OH 44685

# STATE OF OHIO

# CERTIFICATE

Ohio Secretary of State, Jon Husted

2168557

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

STRATEGIC AGGREGATION CONSULTANTS, LLC

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

Pocument(s)

Document No(s):

JMESTIC FOR PROFIT LLC - ARTICLES OF ORG

201302501465



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

Witness my hand and the seal of the Secretary of State at Columbus, Ohio this 25th day of January, A.D. 2013:

Ohio Secretary of State



# **Aggregation Consultants, LLC**

)oc ID -->

201302501465



Form 633A Prescribed by: Ohio Secretary of State JON HUSTED Ohio Secretary of State

Central Orio: (814) 468-3810 Toll Free: (877) SOS-FILE (787-3453) June Otto Sconting Office, por Outsing Otto Sconting Office, por Mad this form to one of the following

Regular Filing (non expedite) P.O. Box 676 Columbus, OH 43216

Especito Filing (Pero-Analesses day precapating data ringeless on additional \$150,000. P.O. Box 1300 Calumbus, OH 43218

#### Articles of Organization for a Domestic Limited Liability Company Filing Fee: \$125

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limited its	bility company shall ex	dist for Perfod of Educate	ince	
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# **Aggregation Consultants, LLC**

Joc ID -->

201302501465

By signing and submitting this form to the Ohio Secretary of State, the undersigned hereby certifies that he or she has the requisite authority to execute this document.

Required Articles and original appointment of agent must be aloned by a member, manager or other representative.

If auchorized representative is an includual, then they must alon in the "argusture" box and print their name in the "Print Name" box.

If authorized representative is a business entity, not an individual, then please print the business name in the "signature" box, an euriforized representative of the business entity must align in the "By" box and print their reame in the "Print Name" box.

Brenda Farqo  Print Name  Signature  By (if applicable)  Print Name	
Brenda Farqo  Print Name  Signature  By (if applicable)  Print Name	Solina Jango
Brenda Farqo  Print Name  Signature  By (if applicable)  Print Name	
Signature  By (if applicable)  Print Name	By (if epplicable)
By (if applicable)  Print Name  Signature	
Print Name Signature	Signature
Print Name Signature	
Signature	By (if applicable)
	Print Name
By (If app/lcable)	Signature
	By (If applicable)



#### Aggregation Consultants, LLC

#### **B. APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE**

#### Exhibit B-1

#### Exhibit B-1 "Jurisdictions of Operation"

Strategic Aggregation Consultants, LLC will provide energy consulting services to communities and/or commercial/mercantile/industrial accounts in all Ohio Electric Distribution Companies. Strategic Aggregation Consultants, LLC may also work directly for other CRES to provide services.

#### Exhibit B-2

#### Exhibit B-2: "Experience and Plans"

Strategic Aggregation Consultants, LLC was founded by Brenda Fargo in 2013 following 16 years with FirstEnergy Solutions (FES) to provide energy consulting services. During her tenure at FES, she was responsible for the 2001 creation and continued implementation of the electric aggregation program. Under her guidance, the FirstEnergy Solutions electric aggregation program grew to serve more than 2 Million accounts in 450 Ohio and Illinois communities.

Over the past 12 years, Brenda worked directly with many communities to implement and maintain their aggregation programs. A partial list of those is listed below.

Cities: Akron, Ashland, Barberton, Bay Village, Canal Fulton, Cleveland, Cleveland Heights, Defiance, East Liverpool, East Palestine, Fairlawn, Green, London, Lordstown, Mansfield, Medina, Parma, Ravenna, Richmond Heights, Rossford, Salem, Seven Hills, Springfield, Tallmadge, Westlake, and Youngstown.

Villages: Archbold, Andover, Boston Heights, Creston, Doylestown, East Canton, Mantua, Mogadore, Lisbon, Navarre, Ottawa Hills, Richwood, and Sebring

**Townships:** Bath, Boston, Copley, Coventry, Franklin, Northfield Center, Richfield, Sagamore Hills, Springfield, Twinsburg in Summit County, Fairfield Township in Columbiana County Boardman Township in Mahoning County, and Troy and Burton Townships in Geauga County.

Counties: Ashland, Fulton, Huron, Medina, Ottawa, Richland, and Sandusky

In addition, she has assisted the Public Utilities Commission of Ohio (PUCO) and Office of the Ohio Consumers' Counsel (OCC), the Illinois Commerce Commission (ICC), and the New Jersey Division of the

Rate Counsel with aggregation related issues and provided suggestions to make the programs in those states more beneficial to communities and their participants.

Once a CRES supplier has been selected and executes a contract with the community and/or commercial/mercantile/industrial account, all customer service inquiries and complaints will be handled by the selected CRES supplier. Any supplier chosen as a result of Strategic Aggregation Consultants' efforts will have a robust customer service organization that will meet or exceed the PUCO requirements. All billing will be handled by the selected CRES suppliers.



# **Aggregation Consultants, LLC**

#### **Exhibit B-3**

#### Exhibit 8-3 "Disclosure of Liabilities and Investigations"

Strategic Aggregation consultants, LLC has no existing, pending, or past judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact Strategic Aggregation Consultants, LLC financial or operational status or ability to provide the services it is seeking to be certified to perform.

#### **Exhibit B-4**

Exhibit B-4 "Disclosure of Consumer Protection violations"

See application Page 4

#### **Exhibit B-5**

Exhibit B-5 "Disclosure of Certification denial, curtailment, suspension, or revocation"

See Application Form, page 4

#### **Exhibit B-6**

Exhibit B-6 "Environmental Disclosure"

**Not Applicable** 

#### C. APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

#### Exhibit C-1

Exhibit C-1 "Financial Reporting"

As a Limited Liability Corporation, Strategic Aggregation Consultants, does not, nor is required to prepare annual reports or make SEC filings. As such, none are contained within this application.

#### Exhibit C-2 — FILED SEPARATELY UNDER SEAL

Exhibit C-2 "Financial Statements"

# **Aggregation Consultants, LLC**

#### Exhibit C-3 - FILED SEPARATELY UNDER SEAL

Exhibit C-3 "Forecasted Financial Statements"

#### **Exhibit C-4**

#### Exhibit C-4 "Credit Rating"

Strategic Aggregation Consultants, LLC has not established a credit rating as it has not sought to obtain any credit nor intends to in the future. A Duns number has been established.

#### **Exhibit C-5**

#### Exhibit C-5 "Credit Report"

Strategic Aggregation Consultants, LLC has not established a credit rating as it has not sought to obtain any credit nor intends to in the future. A Duns number has been established.

#### **Exhibit C-6**

#### Exhibit C-6 "Bankruptcy Information"

See Application Form, Page 6

#### **Exhibit C-7**

#### Exhibit C-7 "Merger Information"

See Application Form, Page 6

#### Exhibit C-8

#### Exhibit C-8 "Corporate Structure"

Not applicable - Stand-alone entity with no affiliate or subsidiary companies.

#### **Exhibit C-9**

Exhibit C-9 "Financial Arrangements"



## **Aggregation Consultants, LLC**

Strategic Aggregation Consultants, LLC will be operating as a consultant/aggregator and not taking title to any physical power. As such, no financial arrangements are needed.

#### D. TECHNICAL CAPABILITY

#### **Exhibit D-1**

#### Exhibit D-1 "Operations"

Strategic Aggregation Consultants provides bidding services and community consulting to its clients. Once a CRES supplier has been selected and executes a contract with the community and/or commercial/mercantile/industrial account, all customer service inquiries and complaints will be handled by the selected CRES supplier. Any supplier chosen as a result of Strategic Aggregation Consultants' efforts will have a robust customer service organization that will meet or exceed the PUCO requirements. All aggregation billing will be handled by the selected CRES suppliers.

#### **Exhibit D-2**

#### Exhibit D-2 "Operations Expertise and Key Technical People"

Strategic Aggregation Consultants, LLC is a stand-alone entity. The President, Brenda Fargo, provides all needed services to its customers. Please see Exhibit B-2 for her experience.

Brenda Fargo, President

Email: bfargo.sac@gmail.com

Phone number: 330-415-2268

#### Exhibit D-3

Exhibit D-3 "FERC Power Marketer Authorization"

Not applicable.