



# Public Utilities Commission

Competitive Retail Natural Gas Service  
(CRNGS) Provider Application

Case Number: 12 - 1134 - GA - CRS

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: North American Power and Gas, LLC  
Street Address: 1500 Rankin Road, Suite 200  
City: Houston State: TX Zip: 77073  
Telephone: 877-572-0442 Website: www.napower.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: North American Power and Gas, LLC  
Street Address: 1500 Rankin Road, Suite 200  
City: Houston State: TX Zip: 77073  
Telephone: 877-572-0442 Email: customercare@napower.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): \_\_\_\_\_  
\_\_\_\_\_

**A-5. Contact person for regulatory matters.**

Name: Clint Sandidge Title: Managing Director  
Street Address: 1500 Rankin Road, Suite 200  
City: Houston State: TX Zip: 77073  
Telephone: 713-361-7717 Email: clint.sandidge@calpine.com

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

Name: Josh Christopher Title: Counsel II  
Street Address: 1500 Ranking Road, Suite 200  
City: Houston State: TX Zip: 77073  
Telephone: 713-361-7735 Email: joshua.christopher@calpine.com

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

Street Address: 1500 Rankin Road, Suite 200  
City: Houston State: TX Zip: 77073  
Toll-free  
Telephone: 888-313-9086 Email: customer@napower.com

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

FEIN: 27-1077320

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

Sole Proprietorship <input type="checkbox"/>	Limited Liability Partnership (LLP) <input type="checkbox"/>	Corporation <input type="checkbox"/>	Partnership <input type="checkbox"/>
Limited Liability Company (LLC) <input checked="" 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: 03/01/2012

**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: KBHR Statutory Agency Title: \_\_\_\_\_  
Street Address: 65 E. State Street, Suite 1800  
City: Columbus State: OH Zip: 43215  
Telephone: 614-462-5400 Email: n/a

**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.**

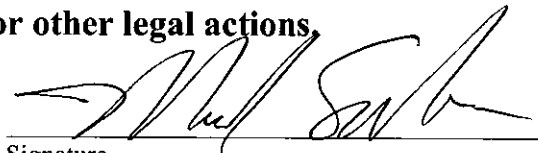
Retail natural gas brokers/aggregators: Include details of the applicant's business operations and plans for arranging and/or aggregating for the supply of natural gas to retail customers.

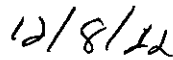
Gas Marketers: Describe the operational nature of the applicant's business, specifying whether operations will include the contracting of natural gas purchases for retail sales, the nomination and scheduling of retail natural gas for delivery, and/or the provision of retail ancillary services, as well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

  
\_\_\_\_\_  
Date

**President**  
\_\_\_\_\_

Title

# Competitive Retail Natural Gas Service Affidavit

County of Harris :

State of Texas :


Michael Sullivan, 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.

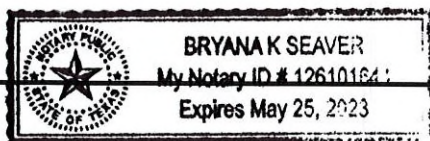
10. Affiant further saith naught.

  
Signature of Affiant & Title

Sworn and subscribed before me this 8<sup>th</sup> day of Dec, 2022  
Month Year

  
Signature of official administering oath

BRYANA SEAYER  
Print Name and Title



My commission expires on 5-26-23



**EXHIBIT A-12**  
**“Principal Officers, Directors, & Partners”**

OFFICERS:	DIRECTORS:	OTHER:
Michael Sullivan President 1500 Rankin Road, Ste. 200 Houston, Texas 77073	John B. (Thad) Hill Director 717 Texas Avenue, Suite 1000 Houston, Texas 77002	W. Thaddeus Miller Chief Legal Officer 717 Texas Avenue, Suite 1000 Houston, Texas 77002
Sean G. Fallmer Senior Vice President 401 West A Street, Suite 500 San Diego, CA 92101	W. Thaddeus Miller Director 717 Texas Avenue, Suite 1000 Houston, Texas 77002	
Bryan Kimzey Vice President 717 Texas Avenue, Suite 1000 Houston, Texas 77002		
Kaiser Malik Assistant Secretary 717 Texas Avenue, Suite 1000 Houston, Texas 77002		
W. Thaddeus Miller Corporate Secretary 717 Texas Avenue, Suite 1000 Houston, Texas 77002		
Andrew Novotny Vice President 717 Texas Avenue, Suite 1000 Houston, Texas 77002		
Zamir Rauf Chief Financial Officer 717 Texas Avenue, Suite 1000 Houston, Texas 77002		
Caleb Stephenson Vice President 717 Texas Avenue, Suite 1000 Houston, Texas 77002		

James Wood Vice President 401 West A Street, Suite 500 San Diego, CA 92101		
Katherine Piper Assistant Corporate Secretary 1500 Rankin Road, Ste. 200 Houston, Texas 77073		

EXHIBIT A-13  
"Company History"

North American Power and Gas, LLC ("NAPG") was founded in 2009 by two former CEO's, Kerry Breitbart and Cary Turnbull. NAPG is licensed and eligible to supply natural gas in four states: New York, New Jersey, Ohio, and Pennsylvania. NAPG is also licensed and eligible to supply electricity in eleven states: Connecticut, Illinois, Maine, Pennsylvania, Maryland, New Hampshire, New Jersey, New York, Ohio, Rhode Island, and Texas.

**EXHIBIT A-14**  
**“Secretary of State”**

Please see attached proof of current registration with the Secretary of State.

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 NORTH AMERICAN POWER AND GAS, LLC, a Delaware Limited Liability Company, Registration Number 2054849, was registered in the State of Ohio on October 13, 2011, is currently authorized to transact business in this state.*



*Witness my hand and the seal of the  
Secretary of State at Columbus, Ohio  
this 8th day of December, A.D. 2022.*

A handwritten signature in blue ink, appearing to read "Frank LaRose", written in a cursive style.

**Ohio Secretary of State**

**Validation Number: 202234203310**

**EXHIBIT B-1**  
**“Jurisdictions of Operation”**

**North American Power and Gas, LLC**

***Natural Gas*** – Ohio, New Jersey, New York, and Pennsylvania

***Electricity*** – Connecticut, Illinois, Maine, Maryland, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, and Texas

**Champion Energy Services, LLC**

Connecticut, Delaware, District of Columbia, Illinois, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, and Texas

**Calpine Energy Solutions, LLC**

Arizona, California, Connecticut, Delaware, District of Columbia, Illinois, Maine, Maryland, Massachusetts, Michigan, New Hampshire, New Jersey, New York, Ohio, Oregon, Pennsylvania, Rhode Island, Texas, and Washington

**Calpine Power America-ME, LLC**

Maine

**Calpine Power America-CA, LLC**

California

**Calpine Power America, LLC**

Texas

## **EXHIBIT B-2**

### **“Experience & Plans”**

Since founding in 2009, North American Power and Gas, LLC (“NAPG”) has obtained authority to sell, market and provide gas supply in four (4) states: Ohio, New Jersey, New York, and Pennsylvania and electricity supply in eleven (11) states; Connecticut, Illinois, Maine, Pennsylvania, Maryland, New Hampshire, New Jersey, New York, Ohio, Rhode Island, and Texas.

#### **Contracting with Customers**

NAPG utilizes four main ways to contract with customers: phone enrollment, door-to-door enrollment, business reply mail, and online enrollment. For both phone and online methods, customers are mailed our Terms of Service and are given all applicable right of rescission if they do not wish to abide by these terms.

When customers enroll with NAPG, they continue to have their gas delivered to them via their utility delivery company, who also services their lines and responds to any emergencies.

Consolidated billing statements are provided to the customer through the utility company for most territories with the exception of TX. NAPG establishes how much the customer owes for that month based on their rate and usage. They then send that amount to the utility company who includes NAPG’s charges on their utility consolidated bill to the customer. In TX, consolidated billing statements are provided to the customer through NAPG. The customer will send the total invoice amount to NAPG, we include and pass through the utility delivery charges on our invoice, and we send the utilities portion of the customer’s payment to them.

For customer inquiries, NAPG has a toll-free customer service number (888-313-9086) that customers can call Monday-Friday, 8am-6pm EST. Additionally, in ensuring compliance with all federal, state, utility, and Commission rules, NAPG has a compliance department that specializes in responding to customer complaints and monitoring enrollments to ensure that the Company remains compliant with all requirements. Further, NAPG is staffed with a Regulatory Director and a General Counsel to further assure compliance with any and all regulations pursuant to which it is Gas Marketer’s license was issued, including section 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code. Additionally, as the situation requires, NAPG consults with outside local counsel on state-specific matters.

NAPG continues to provide retail energy and gas supply services to eligible consumers and businesses through the State of Ohio.

**EXHIBIT B-3**  
**“Disclosure of Liabilities and Investigations”**

**Public Utility Commission of Texas Investigations**

On March 30, 2020, the Public Utility Commission of Texas (“PUCT”) initiated Investigation No. 2020030050 to investigate Champion Energy Services, LLC’s (“Champion”) alleged disconnection of residential customers during extreme weather emergencies, in violation of PURA § 39.101(h) and 16 TAC § 25.483. Champion complied with the PUCT’s investigations and responded to all requests for information. To date, there has been no official determination as to Champion’s culpability and Champion maintains that it acted properly and in accordance with all of its regulatory requirements.

On August 15, 2022, the Division of Compliance and Enforcement of the PUCT initiated Investigation No. SIR2022080001 into Champion's compliance with 16 Tex. Admin Code (TAC) § 25.474 and 25.478. Champion offered a deposit alternative program called "Fast Track" under which customers who would otherwise be required to pay a traditional customer deposit may instead choose to pay a one-time non-refundable charge of \$168, which was the subject of the investigation. Champion complied with the PUCT’s investigation and responded to all requests for information. On October 12, 2022 the PUCT closed the investigation and recommended no further action. Champion maintains that it acted properly and in accordance with all regulatory requirements.



**EXHIBIT C-1**  
**“Annual Reports”**

NAPG is not an SEC registrant and has not SEC reporting obligations.

The most recent 10-K for Calpine Corporation, NAPG’s ultimate, indirect parent company, may be found at: <https://sec.report/Ticker/CPN>

**EXHIBIT C-2**  
**“Financial Statements”**

This exhibit contains confidential and proprietary information and is being submitted under seal.

**EXHIBIT C-3**  
**“Forecasted Financial Statements”**

This exhibit contains confidential and proprietary information and is being submitted under seal.

**EXHIBIT C-4**  
**“Credit Rating”**

The credit rating for Calpine Corp are:

Moody's – B2

Fitch – B+

Please also see attached letter from Calpine Corp in support of NAPG's business in Ohio.



# CALPINE CORPORATION

717 TEXAS AVENUE, SUITE 1000  
HOUSTON, TX 77002  
713.830.2000 (M)

December 1, 2022

The Public Utilities Commission of Ohio  
Docket Department  
180 East Broad Street  
Columbus, OH 43215-3793

RE: North American Power and Gas, LLC – Gas Certificate No. 12-249G

Dear Sir or Madam,

Reference is made to the requirement under Exhibit C-4 Credit Rating in the PUCO Renewal Certification Application for Competitive Retail Natural Gas Suppliers. Pursuant to Exhibit C-4, I am submitting this verification of ownership and financial wherewithal.

North American Power and Gas, LLC (“NAPG”) is a wholly-owned indirect subsidiary of Calpine Corporation (“Calpine”), a Delaware corporation in good standing. Calpine’s current senior unsecured debt ratings are B+ (Fitch) and B2 (Moody’s).

Calpine will continue to maintain all appropriate credit facilities as necessary to support NAPG’s business in Ohio.

Sincerely,

Jeffery Koshkin  
Senior Vice President  
Calpine Corporation

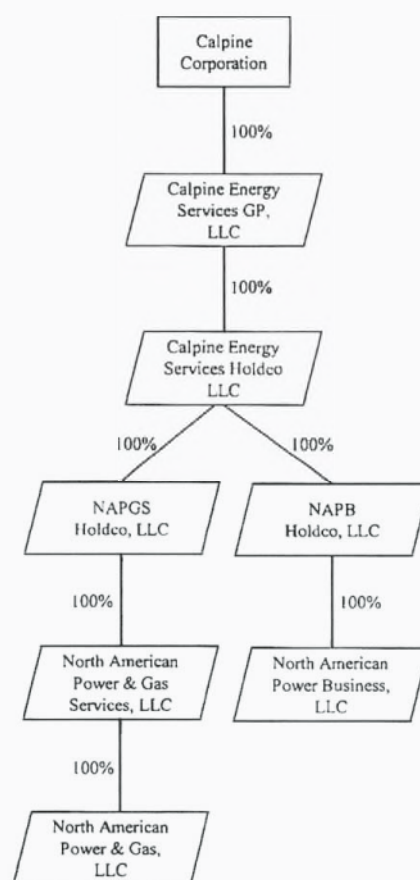
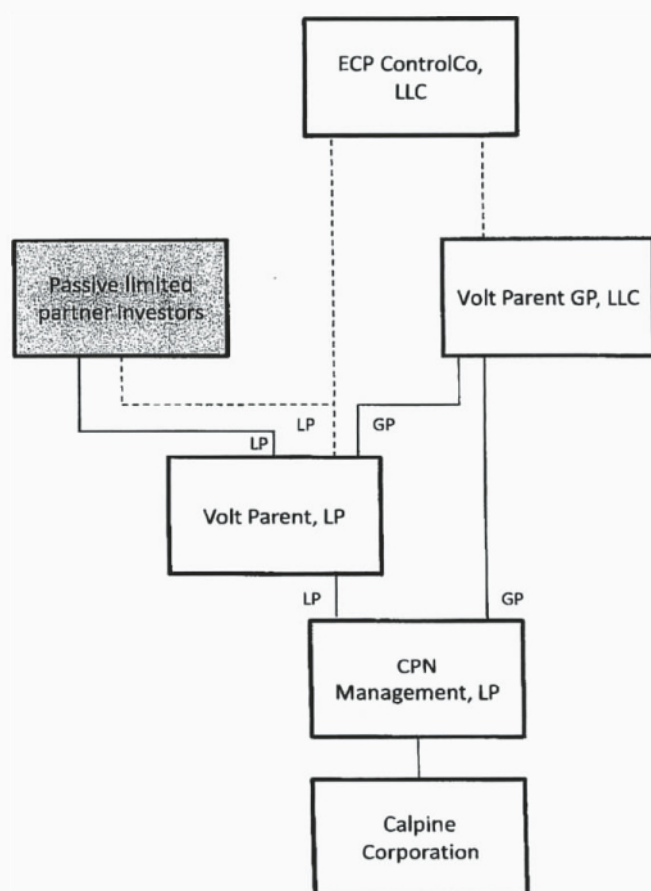
**EXHIBIT C-5**  
**“Credit Report”**

This exhibit contains confidential and proprietary information and is being submitted under seal.

**EXHIBIT C-8**  
**“Corporate Structure”**

Please see attached.

Exhibit C-8





# Exhibit C-8

Name of Member/Applicant
North American Power and Gas, LLC

Immediate Corporate Parent(s) of Member/Applicant
North American Power and Gas Services, LLC

Ultimate Corporate Parent(s) of Member/Applicant
ECP ControlCo, LLC

Member Affiliates of Member/Applicant
Calpine Mid-Atlantic Marketing LLC
Calpine Bethlehem, LLC
Calpine Energy Services, L.P.
Champion Energy Services, LLC
Calpine Energy Solutions, LLC
Champion Energy, LLC
Champion Energy Marketing LLC
Wheelabrator Baltimore, L.P.
Wheelabrator Falls Inc.
Wheelabrator Frackville Energy Co., Inc.
Wheelabrator Gloucester Company, L.P.
Wheelabrator Portsmouth, Inc.

**EXHIBIT C-9**  
**“Financial Arrangements”**

Please find attached a letter from Dominion demonstrating that NAPG meets the collateral requirements.



**Dominion Energy Ohio**  
1201 East 55<sup>th</sup> Street  
Cleveland, OH 44103

November 30, 2022

To date, North American Power & Gas, LLC has met all natural gas obligations to be an approved supplier on The East Ohio Gas Company dba Dominion Energy Ohio.

Thank you,

**Dina M Longo**

Dina M. Longo  
Transportation Services Program Manager

## **EXHIBIT D-1**

### **“Operations”**

North American Power and Gas, LLC’s (“NAPG”) operations include acquiring customers, purchasing and managing supply, and providing accurate bills and customer service.

NAPG has established business processes and systems to manage all aspects of supplying retail natural gas in Ohio. NAPG’s operations will not include the production of natural gas from owned assets. Instead, NAPG, through its affiliate Calpine Energy Solutions, LLC, (“CES”) will purchase physical natural gas via its wholesale supply arrangement with a AA rated wholesale supplier. NAPG utilizes various financial hedging approaches to ensure that its supply obligation is properly managed under its corporate risk management policies and procedures.

Billing and customer service are provided by NAPG from our home office in Houston, Texas that is fully staffed with experienced employees who understand the customer base and deregulation. NAPG remains exclusively responsible for customer service questions and complaints regarding its products and services. Such services will primarily be delivered via toll-free telephone (888.313.9086). Customers may inquire about complaints, charges, service or any other pertinent business issues 24 hours a day, 7 days a week.

## **EXHIBIT D-2**

### **“Operations Expertise”**

#### **Members and Years of Retail and Wholesale Energy Experience**

- Michael Sullivan, President  
21 Years
- Alon Erlichman, VP – Information Technology  
19 Years
- John Ballenger, VP – Marketing Operations  
13 Years

#### **Customer Acquisition and Contracting**

Management has over 40 years combined experience in contracting with retail energy customers. Experience includes developing products and services in deregulated markets to sell gas and power to mid-size and large energy consumers. Management has contracted with power and gas customers in Delaware, Connecticut, Maine, Texas, Illinois, Pennsylvania, Ohio, New Jersey, Maryland, Rhode Island, New Hampshire, and New York developing and selling contracts that complied with the local utility commission rules and supply customers with a valuable product.

#### **Physical Supply and Risk Management**

Management has over 40 years combined experience in supplying physical energy and managing risk associated with delivering energy including (i) complying with pipeline, utility, Independent System Operator, and public utility commission rules for the respective markets; (ii) identifying and managing all risks associated with supplying energy to retail customers in multiple markets in the United States; and (iii) providing expert risk management allowed for stable products and services to a diverse group of customers.

#### **Customer Service**

Management has over 40 years of combined experience in a wide range of customer service areas and retains significant experience in dealing directly with customers to ensure products and services exceed customer requirements. Management has developed customer service systems to answer thousands of customer questions in a timely manner, which required a thorough understanding of applicable utility commission rules and full compliance with those rules.

**EXHIBIT D-2 Continued**  
**“Key Technical Personnel”**

**Michael Sullivan**

*President*

- Michael Sullivan serves as President of North American Power and Gas, LLC (“NAPG”). Michael served as Chief Operating Officer for Champion Energy Services, LLC (“Champion”) from 2010 to 2015. Prior to joining Champion, Michael was a founding partner of Ambridge Energy, LLC, which merged with Champion in 2008. Prior to founding Ambridge, he held several operations and marketing support roles at Reliant Energy between 2002 and 2007. Michael's career began at Andersen Consulting and later spent several years at Arthur Andersen. He earned a Bachelor of Science in Finance from the University of South Alabama and a Master of Business Administration from Baylor University.

**Alon Erlichman**

*Vice President, Information Technology*

- Alon Erlichman leads NAPG's Information Technology team which provides system infrastructure, application development, and business process optimization support to the organization. He is responsible for maintaining and expanding the company's information technology platform to support growth, as well as introducing innovative technology to improve our customers' experience. Alon has 16 years of leadership experience in the retail electricity industry and previously oversaw Champion's Customer Operations and Customer Care functions across all markets. Prior to joining Champion in 2011, he held several roles at Reliant Energy, including market settlements, and customer operations. Alon's career began at Arthur Andersen in the Business Consulting practice after he earned a Bachelor of Business Administration in Marketing from the Business Honors Program at the University of Texas in Austin.

**Sean Fallmer**

*Senior Vice President, Commodity Pricing and Supply*

As Senior Vice President of Pricing & Supply, Sean leads Calpine's and NAPG's Portfolio Management, Commodity Structuring, Scheduling & Forecasting as well as the Regulatory & ISO Analytics team(s) for the firms' North American retail platform that includes residential, mass-market and commercial and industrial business segments for both power

and gas. Sean began his commodity career as a floor trader and member of the Chicago Mercantile Exchange. He later progressed to lead commodity risk management and derivative (e.g., FASB 133/IAS 39) engagements with Fortune 500 firms as a member of KPMG's Financial Risk Management group. Immediately prior to joining Calpine Energy Solutions in 2007, Sean led ABN AMBRO's North American Credit Risk & Analytics group, where he was responsible for developing and overseeing retail credit risk analytics and policies for a \$24 billion credit derivative portfolio. In addition to the Chicago Mercantile Exchange, Sean has been a member of the United States Association of Energy Economics (USAEE) and the National Futures Association. He has made several presentations on risk management, commodity hedging and renewables to various leaders in the energy industry, contributed to regulatory-position papers to ISO' and FERC, and contributed to texts authored by notable economists such as Arthur Laffer. Sean holds a B.S.B.A in Finance from the University of Arizona and an M.B.A. from the University of Chicago.

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