



DIS Case Number: 15-0874-GA-AGG

Section A: Application Information

A-1. Provider type:

☒ Retail Natural Gas
Broker

☐ Retail Natural Gas
Aggregator

☐ Retail Natural Gas
Marketer

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

Legal Name: Integrity Energy LTD

Phone: 2165024410 **Extension (if applicable):**

Country: United States

Street: 5711 Grant Ave Cleveland, OH 44105

Website (if any): www.integenergy.com

City: Cleveland

Province/State:

Postal Code: 44105

A-3. Names and contact information under which the applicant will do business in Ohio

Provide the names and contact information the business entity will use for business in Ohio. This does not have to be an Ohio address and may be the same contact information given in A-2.

Name	Type	Address	Active?	Proof
Integrity Energy, LTD	Official Name	5711 Grant Avenue Cleveland, OH 44105	Yes	Link

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

Provide all business names the applicant uses in North America, including the names provided in A-2 and A-3.

Name	Type	Address	Active?	Proof
Integrity Energy, LTD	Official Name	5711 Grant Avenue Cleveland, OH 44105	Yes	Link

A-5. Contact person for regulatory matters

Mike Naughton
5711 Grant Ave
Cleveland, OH 44105
US
mnaughton@integenergy.com
2165024409

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

Mike Naughton
5711 Grant Ave
Cleveland, OH 44105
US
mnaughton@integenergy.com
2165024409

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

Phone: 888-737-0590	Extension (if applicable):	Country: United States
Fax:	Extension (if applicable):	Street: 5711 Grant Ave
Email: mike@integenergy.com		City: Cleveland
		Province/State: OH
		Postal Code: 44105

A-8. Applicant's federal employer identification number

27-2217792

A-9. Applicant's form of ownership

Form of ownership: Limited Liability Company (LLC)

A-10. Identify current or proposed service areas

Identify each service area in which the applicant is currently providing service or intends to provide service and identify each customer class that the applicant is currently serving or intends to serve.

Service area selection

Columbia Gas of Ohio
Dominion Energy Ohio
Duke Energy Ohio
CenterPoint Energy Ohio

Class of customer selection

Industrial
Residential
Small Commercial
Large Commercial

A-11. Start date

Indicate the approximate start date the applicant began/will begin offering services: 07-05-2023

A-12. Principal officers, directors, and partners

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

Name	Email	Title	Address
Renee Sanders	rsanders@integrityenergy.com	Director of Sales	5711 Grant Ave Cleveland, OH 44105 US
Mike Naughton	mnaughton@integenergy.com	CEO	5711 Grant Ave Cleveland, OH 44105 US

A-13. Company history

The company has been providing Energy Services in the Ohio for 15 years as a broker in the natural gas and electricity spaces. We have one place of business at 5711 Grant Ave Cleveland, OH 4414

A-14. Secretary of State

Secretary of State Link:

A-15. Proof of Ohio Employee and Office



Public Utilities Commission

Provide proof of an Ohio Office and Employee in accordance with Section 4929.22 of the Ohio Revised Code. List the designated Ohio employee's name, Ohio office address, telephone number and web site address

Employee Name: Mike Naughton

5711 Grant Ave

Cleveland, OH 44105

US

mnaughton@integenergy.com

2165024409

Section B: Applicant Managerial Capability and Experience

B-1. Jurisdiction of operations

List all jurisdictions in which the applicant or any affiliated interest of the applicant is certified, licensed, registered or otherwise authorized to provide retail natural gas service or retail/wholesale electric service as of the date of filing the application..

File Attached

B-2. Experience and plans

Describe the applicant's experience in providing the service(s) for which it is applying (e.g., number and type of customers served, utility service areas, amount of load, etc.). Include the plan for contracting with customers, providing contracted services, providing billing statements and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Sections 4928.10 and/or 4929.22 of the Ohio Revised Code.

Application Experience and Plan Description: Our company has been providing energy broker services for 15 years and have 40,000 commercial customers. We contact our new, renewal, and inbound customers primarily over the phone, although we sometimes will make an in person visit.

B-3. Disclosure of liabilities and investigations

For the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant, describe all existing, pending or past rulings, judgments, findings, contingent liabilities, revocation of authority, regulatory investigations, judicial actions, or other formal or

informal notices of violations, or any other matter related to competitive services in Ohio or equivalent services in another jurisdiction..

Liability and Investigations Disclosures: None

B-4. Disclosure of consumer protection violations

Has the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years?

No

B-5. Disclosure of certification, denial, curtailment, suspension or revocation

Has the applicant, affiliate, or a predecessor of the applicant had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, revoked, or cancelled or been terminated or suspended from any of Ohio's Natural Gas or Electric Utility's Choice programs within the past two years?

No

Section C: Applicant Financial Capability and Experience

C-1. Financial reporting

Provide a current link to the most recent Form 10-K filed with the Securities and Exchange Commission (SEC) or upload the form. If the applicant does not have a Form 10-K, submit the parent company's Form 10-K. If neither the applicant nor its parent is required to file Form 10-K, state that the applicant is not required to make such filings with the SEC and provide an explanation as to why it is not required.

Does not apply



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.

Preferred to file this information confidentially

C-3. Forecasted financial statements

Provide two years of forecasted income statements **based solely on the applicant's anticipated business activities in the state of Ohio**.

Include the following information with the forecast: a list of assumptions used to generate the forecast; a statement indicating that the forecast is based solely on Ohio business activities only; and the name, address, email address, and telephone number of the preparer of the forecast.

The forecast may be in one of two acceptable formats: 1) an annual format that includes the current year and the two years succeeding the current year; or 2) a monthly format showing 24 consecutive months following the month of filing this application broken down into two 12-month periods with totals for revenues, expenses, and projected net incomes for both periods. Please show revenues, expenses, and net income (revenues minus total expenses) that is expected to be earned and incurred in **business activities only in the state of Ohio** for those periods.

If the applicant is filing for both an electric certificate and a natural gas certificate, please provide a separate and distinct forecast for revenues and expenses representing Ohio electric business activities in the application for the electric certificate and another forecast representing Ohio natural gas business activities in the application for the natural gas certificate.

Preferred to file confidentially



C-4. Credit rating

Provide a credit opinion disclosing the applicant's credit rating as reported by at least one of the following ratings agencies: Moody's Investors Service, Standard & Poor's Financial Services, Fitch Ratings or the National Association of Insurance Commissioners. If the applicant does not have its own credit ratings, substitute the credit ratings of a parent or an affiliate organization and submit a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant. If an applicant or its parent does not have such a credit rating, enter 'Not Rated'.

This does not apply

C-5. Credit report

Provide a copy of the applicant's credit report from Experian, Equifax, TransUnion, Dun and Bradstreet or a similar credit reporting organization. If the applicant is a newly formed entity with no credit report, then provide a personal credit report for the principal owner of the entity seeking certification. At a minimum, the credit report must show summary information and an overall credit score. **Bank/credit account numbers and highly sensitive identification information must be redacted.** If the applicant provides an acceptable credit rating(s) in response to C-4, then the applicant may select 'This does not apply' and provide a response in the box below stating that a credit rating(s) was provided in response to C-4.

Preferred to file this information confidentially

C-6. Bankruptcy information

Within the previous 24 months, have any of the following filed for reorganization, protection from creditors or any other form of bankruptcy?

- Applicant
- Parent company of the applicant
- Affiliate company that guarantees the financial obligations of the applicant
- Any owner or officer of the applicant

No

C-7. Merger information

Is the applicant currently involved in any dissolution, merger or acquisition activity, or otherwise participated in such activities within the previous 24 months?



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.

Stand-alone entity with no affiliate or subsidiary companies

Section D: Applicant Technical Capacity

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.

Operations Description: We have a full service company with Sales, Service, Operations, Marketing, IT, and Quality Control.

D-2. Operations Expertise & Key Technical Personnel

Given the operational nature of the applicant's business, provide evidence of the applicant's experience and technical expertise in performing such operations. Include the names, titles, e-mail addresses, and background of key personnel involved in the operations of the applicant's business.

File(s) attached



Public Utilities
Commission

Application Attachments

Business Licenses Detail Report

Entity	Jurisdiction	License	Number	Department	Fee	Frequency	Submit By	Renewal	Filed / Approved	Status
Integrity Energy, LTD (CT)	State of Connecticut	Electric Aggregator	10-04-18	Public Utilities Regulatory Authority						Complete
Integrity Energy, LTD (OH)	State of Ohio	Electric Broker	11-339E(5)	Public Utilities Commission		Every 2 Years	03/11/2023	04/11/2023	3/11/2021 4/11/2021	Complete
Integrity Energy, LTD (PA)	State of Pennsylvania	Natural Gas Broker	A-2018-3002875	Public Utility Commission	\$350.00	Every Year		04/30/2022	3/24/2021 7/23/2021	Renewal Pending
Integrity Energy, LTD (DC)	State of District of Columbia	Electric Broker License	EA2021-10	Public Service Commission		Every 5 Years		08/11/2026	5/17/2021 9/2/2021	Complete
Integrity Energy, LTD (DC)	State of District of Columbia	Natural Gas Broker License	GA2021-07	Public Service Commission		Every 5 Years		08/11/2026	5/17/2021 9/2/2021	Complete
Integrity Energy, LTD (OH)	State of Ohio	Natural Gas Broker	15-444G(3)	Public Utilities Commission		Every 2 Years	06/03/2023	07/03/2023	6/1/2021 7/22/2021	Complete
Integrity Energy, LTD (MA)	State of Massachusetts	Electric Broker	EB-164	Department of Public Utilities		Every Year	07/01/2023	07/01/2023	6/1/2021 11/17/2022	Complete
Integrity Energy, LTD (DC)	State of District of Columbia	Business Tax Registration	260-001365458	Office of Tax Revenue		Every Year		12/31/2021	7/8/2021 7/27/2021	Expired
Integrity Energy, LTD (NH)	State of New Hampshire	Electric Broker License	EA 21-011	Public Utilities Commission		Every Year		09/02/2023	8/13/2021 12/21/2021	Complete
Integrity Energy, LTD (DC)	State of District of Columbia	Business Tax Registration	260-001365458	Office of Tax Revenue		Every Year		12/31/2022		Missing Prerequisite
Integrity Energy, LTD (IL)	State of Illinois	Electric Broker	10-0425	Illinois Commerce Commission		Every Year	03/31/2023	03/31/2023	3/30/2022 7/6/2022	Complete
Integrity Energy, LTD (MD)	State of Maryland	Electric Broker	IR-1985	Public Service Commission		Every Year	04/15/2022	04/15/2023	4/6/2022	Complete
Integrity Energy, LTD (NH)	State of New Hampshire	Foreign Qualification	876811	Department of State, Corporations Division		Every Year		04/01/2023	2/21/2022 2/21/2022	Complete
Integrity Energy, LTD (OH)	State of Ohio	Electric Broker Annual Report	11-339E(5)	Public Utility Commission		Every Year	04/01/2022	03/01/2023	2/28/2022 4/7/2022	Complete
Integrity Energy, LTD (OH)	State of Ohio	Electric Broker Quarterly Report	11-339E(5)	Public Utility Commission		Quarterly	03/11/2023	04/11/2023	4/7/2022 5/26/2022	Complete
Integrity Energy, LTD (OH)	State of Ohio	Natural Gas Broker Annual Report	15-444G(3)	Public Utility Commission		Every Year	04/01/2022	07/03/2023	5/26/2022	Complete
Integrity Energy, LTD (VA)	State of Virginia	Electric Aggregator	A-71	State Corporation Commission	\$100.00	Every Year	03/31/2022	03/31/2023	4/18/2022 6/22/2022	Complete
Integrity Energy, LTD (PA)	State of Pennsylvania	Electric Broker	A-2010-2175245	Public Utility Commission	\$350.00	Every Year	04/30/2023	04/30/2023	3/25/2022 12/6/2022	Complete
Integrity Energy, LTD (PA)	State of Pennsylvania	Natural Gas Broker	A-2018-3002875	Public Utility Commission	\$350.00	Every Year		04/30/2023	3/25/2022	Filed
Integrity Energy, LTD (ME)	State of Maine	Electric Broker	2010-315	Public Utilities Commission		Every Year	07/01/2023	07/01/2023	6/2/2022 6/2/2022	Complete
Integrity Energy, LTD (TX)	State of Texas	Electric Broker	BR190166	Public Utility Commission		Every 3 Years	07/01/2025	07/01/2025	6/25/2022 8/12/2022	Complete
Integrity Energy, LTD (NJ)	State of New Jersey	Energy Agent	EA-0331	Board of Public Utilities	\$201.50	Every Year	12/12/2023	01/12/2024	11/28/2022 1/13/2023	Complete
Integrity Energy, LTD (RI)	State of Rhode Island	Electric Broker	D-96-6(M4)	Public Utilities Commission	\$100.00	Every Year	10/31/2023	12/31/2023	9/30/2022 10/12/2022	Complete

Entity#: 1923765
Filing Type: DOMESTIC LIMITED LIABILITY COMPANY
Original Filing Date: 03/19/2010
Location: ---
Business Name: INTEGRITY ENERGY, LTD.

Status: Active
Exp. Date: -

Agent/Registrant Information

SEAN P. ALLAN
323 W LAKESIDE AVE STE 210
CLEVELAND OH 44113
03/20/2014
Active

Filings

Filing Type	Date of Filing	Document ID
OHIO LLC - ARTICLES OF ORGANIZATION	03/19/2010	201008200534
AGENT ADDRESS CHANGE/LIMITED/LIABILITY/PARTNERS	02/15/2012	201204700623
SUBSEQUENT AGENT APPOINT/LIMITED/LIABILITY/PARTNERS	03/20/2014	201408000913
AGENT ADDRESS CHANGE/LIMITED/LIABILITY/PARTNERS	12/08/2022	202234201000

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

I, Frank LaRose, Secretary of State of the State of Ohio, do hereby certify that this is a list of all records approved on this business entity and in the custody of the Secretary of State.



Witness my hand and the seal of the Secretary of State at Columbus, Ohio this 5th of July, A.D. 2023

Ohio Secretary of State

A handwritten signature in blue ink, reading "Frank LaRose".

Competitive Retail Electric Service Affidavit

County of Cuyahoga:

State of Ohio :

Michael Naughton, 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 Title 49, 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 4928.09, 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.

12. 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.

13. Affiant further sayeth naught.

[Signature] President
Signature of Affiant & Title

Sworn and subscribed before me this 18th day of January, 2023
Month Year

[Signature]
Signature of official administering oath

LEAH MCNEA, NOTARY
Print Name and Title

My commission expires on 8/22/24



LEAH MCNEA
Notary Public, State of Ohio
My Commission Expires
August 22, 2024

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

7/5/2023 9:25:45 AM

in

Case No(s). 15-0874-GA-AGG

Summary: In the Matter of the Application of Integrity Energy LTD