



159 20th St., Suite 1B
Brooklyn, NY 11232

P. 212 590 0145

info@feller.law
www.feller.law

Via FedEx

January 22, 2018

Pennsylvania Public Utility Commission
Secretary
400 North Street, Keystone Building
Harrisburg, PA 17120

RECEIVED

JAN 23 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Natural Gas Broker License Application of Electricity Ratings, LLC, Docket A-2017-2638656

Dear Commission Secretary:

Electricity Ratings, LLC ("Electricity Ratings") hereby submits its response to December 27, 2017 Data Request ("December Data Request") from the Pennsylvania Public Utilities Commission ("Commission" "PAPUC"), which requested responses to the following:

1. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide licenses for Illinois, Maryland, New Jersey, and Ohio. *Please provide the missing documentation.*
2. Reference Application, Section 11, Affidavits – The Affidavits submitted are missing the Commonwealth/State and County information. *Please resubmit the Application Affidavit and the Operations Affidavit.*

Sincerely,

A handwritten signature in black ink, appearing to read "Lena Golze Desmond".

Lena Golze Desmond, Esq.
Feller Law Group, PLLC
159 20th St, Ste 1B, Brooklyn, NY 11232
lenadesmond@feller.law
Counsel for Electricity Ratings, LLC

VERIFICATION

I, Lena Golze Desmond, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Lena Golze Desmond, Esq.
Feller Law Group, PLLC
159 20th St, Suite 1B
Brooklyn, NY 11232
lenadesmond@feller.law
Counsel for Electricity Ratings, LLC

Date: January 23, 2018

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JAN 23 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SECTION 8a
Updated License Information

Attachment 8

Previous Experience

Electricity Ratings, LLC(the “Company”) is an energy brokerage company, established in 2009, that organizes and presents offers from retail suppliers to customers. Customers may then select to purchase electricity or natural gas directly from the retail supplier.

The Company is not an electricity or natural gas supplier and will not be purchasing, or taking title to, the commodity. Further, the Company does not provide billing statements.

The Company does not charge a separate fee to the consumer for its services. As in real estate, the broker fee or commission is included in the price quoted and paid by the seller - the energy provider - after the transaction is complete.

The company is currently licensed in the following states:

License Required to Operate:

- OH Electric/ 17-1235-EL-AGG
- OH Gas / 17-1236-GA-AGG
- NJ Electric / EA-0415
- IL Electric / 17-0236
- PA Electric / A-2017-2618301
- MD Electric / IR-3891
- MD Gas / IR-3892

No License Required to Operate:

- California
- Connecticut (Gas/Electric)
- Georgia (Gas/Electric)
- New York (Gas/Electric)
- Texas

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Electricity Ratings, LLC d/b/a :
Texas Electricity Ratings :
 : 17-0236
Application for Licensure of :
Agents, Brokers and Consultants under :
Section 16-115C of the Public Utilities Act. :

By the Commission:

I. INTRODUCTION

On May 11, 2017, Electricity Ratings, LLC d/b/a Texas Electricity Ratings ("Applicant") filed a verified application with the Illinois Commerce Commission ("Commission") requesting a certificate of service authority to operate as an agent, broker, or consultant ("ABC") in Illinois pursuant to Section 16-115C of the Public Utilities Act ("Act"), 220 ILCS 5/1-101 et seq., and 83 Ill. Adm. Code 454, "Licensure of Retail Electric Agents, Brokers and Consultants" ("Part 454"). Applicant requests authority to offer services as an ABC for the procurement or sale of retail electricity supply for third parties in the State of Illinois. Upon review of the application, Staff of the Commission requested additional information and clarification of certain matters. On June 28, 2017, Applicant filed an Errata to its Application. Since all of the information to grant the requested relief was contained in the Application and Errata to the Application, the Hearing was waived.

II. REQUIREMENTS FOR ALL APPLICANTS UNDER SECTION 16-115C OF THE ACT

Applicant is a business organized under the laws of Texas and authorized to transact business in Illinois. Applicant has certified that it will comply with all applicable regulations; that it will comply with informational and reporting requirements established by Commission rule; that it will comply with informational and reporting requirements pursuant to Section 16-115C of the Act; and that it will comply with all other applicable laws, regulations, terms, and conditions required to the extent they have application to the services being offered by an ABC. Applicant has agreed to ensure that any person who acts on its behalf will comply with all applicable sections of Part 454. Applicant agrees that it will remain in compliance with the provisions of the Act and Part 454, and will ensure that authorizations received from customers, and all other applicable records are retained for a period of not less than three calendar years after the calendar year in which they were created. Applicant has agreed to adopt and follow rules and procedures to preserve the confidentiality of its customers' data. The Applicant has also attested that

no complaints have been filed against it for its provision of services in the electric or gas industry in the jurisdictions where it provides or is seeking to provide services.

III. FINANCIAL, TECHNICAL, AND MANAGERIAL REQUIREMENTS OF SECTION 16-115C

Applicant is required by Section 454.60 to demonstrate that it meets the managerial qualifications necessary to provide services as an ABC. Applicant must further provide an organizational chart that indicates the position of persons which satisfy the managerial qualification. Applicant has demonstrated that it meets the managerial qualifications set forth in Section 454.60 through Attachments A and B to the Application. Attachment A to the Application contains a corporate organizational chart and identifies the occupational background information of the persons being used to meet the requirements of Section 454.60(a). Attachment B contains occupational background information on the person or persons being used to meet the requirements of Section 454.60(a).

Applicant is required by Section 454.70 to demonstrate that it meets the technical qualifications necessary to provide services as an ABC. Applicant has demonstrated that it meets the technical qualifications set forth in Section 454.70 with the information provided in Attachment B. Attachment B contains occupational background information on the person or persons being used to meet the requirements of Section 454.70(a).

Pursuant to the requirements of Section 454.80 of Part 454, Applicant provided a surety bond in the amount of \$5,000 issued by a qualifying surety authorized to transact business in Illinois. Applicant further agrees to comply with the Code of Conduct for ABCs contained in Section 454.90.

IV. COMMISSION CONCLUSION AND CERTIFICATE OF SERVICE AUTHORITY

The Commission has reviewed the application and attachments along with the supplementary information provided by Applicant regarding the technical, managerial, and financial requirements and all other requirements of the Act and Part 454 and finds that the Applicant sufficiently demonstrates compliance with the requirements. The Commission concludes, therefore, that Applicant's request for a certificate of service authority to operate as an ABC in Illinois should be granted and should include the following authority:

CERTIFICATE OF SERVICE AUTHORITY

IT IS CERTIFIED that Electricity Ratings, LLC d/b/a Texas Electricity Ratings is granted service authority to operate as an agent, broker, or consultant for the procurement or sale of retail electricity supply for third parties in the State of Illinois.

V. FINDINGS AND ORDERING PARAGRAPHS

The Commission, having reviewed the entire record, is of the opinion and finds that:

- (1) Electricity Ratings, LLC d/b/a Texas Electricity Ratings, a business organized under the laws of Texas and authorized to transact business in Illinois, seeks a certificate of service authority to operate as an ABC under Section 16-115C of the Act;
- (2) the Commission has jurisdiction over the party hereto and the subject matter hereof;
- (3) the recitals of fact and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) Electricity Ratings, LLC d/b/a Texas Electricity Ratings has demonstrated that it possesses sufficient financial, managerial, and technical resources and abilities to provide services as an ABC for the procurement or sale of retail electricity supply to third parties in the State of Illinois;
- (5) Electricity Ratings, LLC d/b/a Texas Electricity Ratings has complied with Section 16-115C of the Act and Part 454; and
- (6) Electricity Ratings, LLC d/b/a Texas Electricity Ratings should be granted a certificate of service authority to operate as an ABC as specified in this Order.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that Electricity Ratings, LLC d/b/a Texas Electricity Ratings is hereby granted a Certificate of Service Authority authorizing it to operate as an agent, broker, or consultant; said Certificate of Service Authority shall read as that set forth in Section IV of this Order.

IT IS FURTHER ORDERED that Electricity Ratings, LLC d/b/a Texas Electricity Ratings shall comply with all applicable Commission rules and orders now and as hereafter amended.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 26th day of July, 2017.

(SIGNED) BRIEN SHEAHAN

Chairman

W. KEVIN HUGHES
CHAIRMAN

MICHAEL T. RICHARD
ANTHONY O'DONNELL
ODOGWU OBI LINTON
MINDY L. HERMAN

PUBLIC SERVICE COMMISSION

#6, 10/18/17 AM; ML#s 214995, 216108 and 217018
License Reference No.: IR-3891

October 18, 2017

Matt Oberle, Managing Member
Electricity Ratings, LLC
1502 Sawyer St., Ste. 130
Houston, TX 77007

Dear Mr. Oberle:

On May 4, 2017, Electricity Ratings, LLC ("Company") filed an Application for a License to Supply Electricity or Electric Generation Services in Maryland under COMAR 20.51. The Company proposes to provide electricity supplier services in Maryland for residential, commercial and industrial customers as described in the application. Additional information was filed on July 18, 2017 and September 26, 2017.

After considering this matter at the October 18, 2017 Administrative Meeting, the Commission granted the Company a license to supply electricity or electric generation services in Maryland (License Reference Number IR-3891). The license granted by the Commission under this Letter Order is limited solely to electricity supplier broker services for all customer classes and service territories applied for and recommended by Staff. Additionally, the Company is directed to provide marketing and training materials specific to its Maryland operations to the Commission Staff and the Office of People's Counsel 30 days prior to utilization of the materials in Maryland.

Finally, the Company is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People's Counsel.

By Direction of the Commission,

/s/ David J. Collins

David J. Collins
Executive Secretary

DJC/st

COMMISSIONERS

W. KEVIN HUGHES
CHAIRMAN

MICHAEL T. RICHARD
ANTHONY O'DONNELL
ODOGWU OBI LINTON
MINDY L. HERMAN

STATE OF MARYLAND



PUBLIC SERVICE COMMISSION

#7, 10/18/17 AM; ML#s 215063, 216107 and 217022
License Reference No.: IR-3892

October 18, 2017

Matt Oberle, Managing Member
Electricity Ratings, LLC
1502 Sawyer St., Ste. 130
Houston, TX 77007

Dear Mr. Oberle:

On May 4, 2017, Electricity Ratings, LLC ("Company") filed an Application for a License to Supply Natural Gas or Natural Gas Supply Services under COMAR 20.54. The Company proposes to provide natural gas supplier services in Maryland for residential, commercial and industrial customers as described in the application. Additional information was filed on July 18, 2017 and September 26, 2017.

After considering this matter at the October 18, 2017 Administrative Meeting, the Commission granted the Company a license to supply natural gas or natural gas supply services in Maryland (License Reference Number IR-3892). The license granted by the Commission under this Letter Order is limited solely to natural gas supplier broker services for the customer classes and service territories recommended by Staff. Additionally, the Company is directed to provide marketing and training materials specific to its Maryland operations to the Commission Staff and the Office of People's Counsel 30 days prior to utilization of the materials in Maryland.

Finally, the Company is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People's Counsel.

By Direction of the Commission,

/s/ David J. Collins

David J. Collins
Executive Secretary

DJC/st



Chris Christie
Governor

Kim Guadagno
Lt. Governor

STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

Irene Kim Asbury
Secretary to the Board
(609) 292-1599

July 26, 2017

Matt Oberle, VP Operations
Electricity Ratings, LLC
1502 Sawyer Street, Suite 130
Houston, Texas 77007

Re: **Energy Agent Initial Registration**
Docket No. EE17020112L

Dear Mr. Oberle:

In accordance with the Electric Discount and Energy Competition Act of 1999, N.J.S.A. 48:3-49 et seq., at its July 26, 2017 Agenda meeting, the New Jersey Board of Public Utilities voted to issue a **REGISTRATION** as an Energy Agent to Electricity Ratings, LLC. Your registration number is EA-0415.

The enclosed registration is effective July 26, 2017 and expires on July 25, 2018. This registration and the rights thereunder are **Non-Transferable**.

This letter is not an endorsement of, nor is it intended for use in, the marketing promotions of the registrant. Registrants shall comply with all applicable law, including the Electric Discount and Energy Competition Act, which prohibits the unauthorized change of a customer's energy provider and other fraudulent and illegal marketing activities.

If you have any questions, please contact Dante Cusi at (609) 292-1356.

Sincerely,

A handwritten signature in black ink that reads "Irene Kim Asbury".

Irene Kim Asbury
Secretary of the Board

IKA/dec
Encl. (s)

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350

HEREBY REGISTERS

Electricity Ratings, LLC

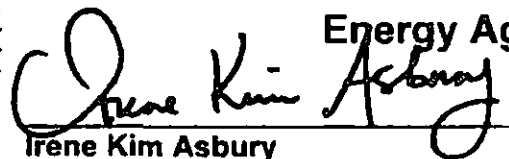
1502 Sawyer Street

Suite 130

Houston, Texas 77007

To conduct business in the State of New Jersey as an

Energy Agent


Irene Kim Asbury

Secretary of the Board

Registration No. EA-0415
Effective Date: July 26, 2017
Expiration Date: July 25, 2018

FILE

Ohio

**Public Utilities
Commission**

Asim Z. Haque, Chairman

Commissioners
M. Beth Trombold
Thomas W. Johnson
Lawrence K. Friedeman
Daniel R. Conway

3

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

Certificate Number:

17-1234E (1)

Issued Pursuant to Case Number(s):

17-1235-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to, **Electricity Ratings, LLC** whose office or principal place of business is located at **1502 Sawyer St, Suite 130, Houston, TX 77007** to provide **power broker** services within the State of Ohio effective **June 11, 2017**.

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.


Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: **June 16, 2017**

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO



Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Felecia D. Burdett, Acting Secretary

Certificate Expires: June 11, 2019

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

180 East Broad Street
Columbus, Ohio 43215-3793

Date Processed **JUN 16 2017**

(614) 466-3016
www.PUCO.ohio.gov

CRES AUTOMATIC CASE ACTION FORM

Date: **6-16-17**

Case Number: **17-1235-EL-AGG**

Company Name and Company Name d/b/a: **Electricity Ratings, LLC**

Company Address: **1502 Sawyer St Suite 130**

Company City/State/Zip: **Houston TX 77007**

Regulatory Contact: **Matt Oberle**

Phone: **866-303-9147**

Email: **moberle@texaselectricityratings.com**

Address: **1502 Sawyer St Suite 130**

City/State/Zip: **Houston TX 77007**

Renewal

Action Needed:

Issue Certificate Number to: **Electricity Ratings, LLC**

Effective Date of Certificate: **6-11-17** Certificate Expires: **6-11-19**

Renew Certificate Number from: to:

Effective Date of Certificate: Certificate Expires:

Certified To Provide the Following Services:

Retail Generation

Aggregation

Power Marketer

Power Broker

Governmental Aggregation

Revise Certificate Number: to (check all applicable):

Reflect name change from: to

Reflect address change from: to

Correct Administrative Error:

Reflect Change of Ownership to:

Cancel Certificate Number.

Protect Un-redacted copies until:

Close Case File, Case Withdrawn at Applicant's Request

Close Case File

CASE NUMBER: 17-1235-EL-AGG
CASE DESCRIPTION: ELECTRICITY RATINGS, LLC
DATE OF SERVICE: 6/16/2017
DOCUMENT SIGNED ON: 6/16/2017

Sign Here: _____ *SMA*

PARTY OF RECORD	APPLICANT	ATTORNEY
ELECTRICITY RATINGS LLC MATT OBERLE 1502 SAWYER ST, STE 130 HOUSTON, TX 77007 Phone:866-303-9147	NONE	

FILE

3

The Public Utilities Commission of Ohio

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate

Issued pursuant to Case Number(s):
17-1236-GA-AGG

is
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:
17-607G(1)

Granted to:
Electricity Ratings, LLC

Whose office or principal place of business is located at:
1502 Sawyer St, Suite 130, Houston, TX 77007

And is hereby certified to provide:
Retail Natural Gas Aggregator/Broker Services
within the state of Ohio, for a two-year period.

Certification Effective:
June 11, 2017 through June 11, 2019

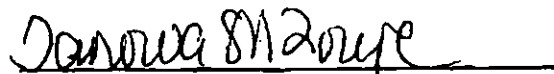
The certification of Ohio competitive retail natural gas aggregators/brokers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

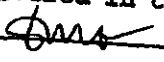
Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio
Dated: **June 12, 2017**

By Order of
The Public Utilities Commission of Ohio


Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Felecia D. Burdett, Acting Secretary

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

Form No. CRNGS/AGG/B-06 Technician  Date Processed **JUN 12 2017**

CRNGS AUTOMATIC CASE ACTION FORM

Date: **June 12, 2017**

Case Number: **17-1236-GA-AGG**

Company Name and Company Name d/b/a: **Electricity Ratings, LLC**

Company Address: **1502 Sawyer St., Suite 130**

Company City/State/Zip: **Houston, TX 77007**

Regulatory Contact: **Matt Oberle**

Phone: **866-303-9147**

Email: **moberle@texaselectricityratings.com**

Address: **1502 Sawyer St., Suite 130**

City/State/Zip: **Houston, TX 77007**

Renewal

Action Needed:

Issue Certificate Number: **17-607G (1)** to: **Electricity Ratings, LLC**
Effective Date of Certificate: **6/11/2017** Certificate Expires: **6/11/2019**

Renew Certificate Number from: _____ to: _____
Effective Date of Certificate: _____ Certificate Expires: _____

Certified To Provide the Following Services:

- Retail Natural Gas Aggregator
- Retail Natural Gas Broker
- Retail Natural Gas Supplier/Marketer
- Natural Gas Governmental Aggregator

Revise Certificate Number: _____ to (check all applicable):

- Reflect name change from: _____ to _____
- Reflect address change from: _____ to _____
- Correct Administrative Error:
- Reflect Change of Ownership to: _____

Cancel Certificate Number:

Protect Un-redacted copies until:

Close Case File, Case Withdrawn at Applicant's Request

Close Case File

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17120**

Public Meeting held October 5, 2017

Commissioners Present:

Gladys M. Brown, Chairman
Andrew G. Place, Vice Chairman
David W. Sweet
John F. Coleman, Jr.

Application of Electricity Ratings, LLC for
Approval to Offer, Render, Furnish or Supply
Electricity or Electric Generation Services
as a Broker/Marketer

Docket Number:
A-2017-2618301

ORDER

BY THE COMMISSION:

On August 11, 2017, the Commission accepted Electricity Ratings, LLC's (Electricity Ratings), Utility Code 1120140, application seeking to become a licensed electric generation supplier (EGS) as a broker/marketer in all of the electric distribution company service territories throughout the Commonwealth of Pennsylvania. The application was filed pursuant to the Commission's regulations at 52 Pa. Code §§ 54.31-54.43, which became effective on August 8, 1998, and which were established under Section 2809 of the Public Utility Code, 66 Pa. C.S. § 2809.

§ 2809 provides in pertinent part that:

License Requirement.--No person or corporation,
including municipal corporations which choose to provide

financial and technical fitness in order to be licensed as a broker/marketer of retail electric power in the Commonwealth of Pennsylvania.

Since Electricity Ratings will be providing electric generation supplier services to residential customers, it is required to comply with, and be governed by, applicable Chapter 56 residential service regulations as set forth in the Commission Order *Guidelines for Maintaining Customer Service at the Same Level of Quality Pursuant to 66 Pa. C.S. § 2807(d), and Assuring Conformance with 52 Pa. Code Chapter 56 Pursuant to 66 Pa. C.S. § 2809(e) and (f)*, at Docket No. M-00960890 F0011, Order entered July 11, 1997. Thus, we deem it appropriate to reiterate certain items with respect to Chapter 56 of our regulations. Chapter 56 (52 Pa Code Chapter 56) is applicable to residential accounts. An electric generation supplier cannot physically disconnect a residential customer from the electricity grid; therefore, the rules relating to residential service termination are not applicable to electric generation suppliers. An electric generation supplier may seek to terminate its generation service through an appropriate written notice to the customer and the distribution company. The residential customer can then attempt to repair their relationship with the supplier, seek a new supplier, or return to utility service at default service rates in accordance with the utility's obligations under Section 2807(e), 66 Pa. C.S. § 2807(e). The customer would only be disconnected from the electricity grid pursuant to appropriate regulations if the customer failed to meet its obligations to the utility or the electric generation supplier that has been designated by the Commission as the provider of last resort.

Additionally, we specifically note that the licensee must comply with, and ensure that its employees, agents, representatives and independent contractors comply with, the standards of conduct and disclosure for licensees set out in Commission regulations at 52 Pa. Code § 54.43 that were enacted to protect consumers of this Commonwealth. These standards include, *inter alia*, the provision of timely and accurate information about the services offered by the licensee, the practice of nondiscrimination in service in regard to

business. In the case of Premier, the company explained that it requested an EGS license to become EDI certified with the utilities, in order to be able to efficiently and effectively obtain electricity usage information for the customers to whom it provides consulting services. Premier intended to utilize the information to help its customers reduce their overall spending for electricity. Premier also stated that it will not take title to power.

The Commission believes that Electricity Ratings operates in a similar manner and therefore should be granted similar relief and be permitted to provide a bond or other approved security in the reduced amount of \$10,000. However, Electricity Ratings' bonding level is contingent upon the company's business model as described in this Order. If Electricity Ratings takes title to generation supply for its customers, and/or charges customers directly for that generation supply, a \$10,000 level of bonding may not be appropriate. Therefore, we will direct Electricity Ratings to notify the Commission 45 days prior to a change in its business model, whereby Electricity Ratings takes title to generation supply and/or bills its customers directly for that generation supply. This will provide the Commission with an opportunity to review and adjust Electricity Ratings' approved bonding level prior to Electricity Ratings implementing those changes.

Electricity Ratings has provided proofs of publication in the Pennsylvania newspapers and proofs of service to the interested parties as required by the Commission.

As of September 26, 2017, no protests have been filed.

We find that the applicant:

1. Is fit, willing and able to properly perform the service proposed in conformance with applicable provisions of the Public Utility Code and lawful Commission orders and regulations.

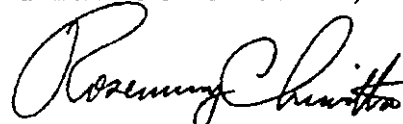
kW demand), industrial, and governmental customers in all of the electric distribution company service territories throughout the Commonwealth of Pennsylvania.

5. That if Electricity Ratings, LLC proposes to change its business model as described in Ordering Paragraph No. 3, it must notify the Commission at least 45 days prior to the changes. With the notice, the Company must provide an update to the nature and scope of business information that was required by 52 Pa. Code § 54.40(c) to justify the modification granted in Ordering Paragraph No. 3. This will provide the Commission the opportunity to review Electricity Ratings, LLC's bonding level and adjust as appropriate, prior to Electricity Ratings, LLC implementing the proposed changes to its business model.

6. That if Electricity Ratings, LLC changes its business model without providing to the Commission the notice and information required in Ordering Paragraph No. 5, then the reduced bonding level permitted by Ordering Paragraph No. 2 shall cease effective with the date of the change in the business model. The level of bonding effective at that time shall be \$250,000 or the level required by 52 Pa. Code § 54.40, whichever is greater.

7. That this proceeding at Docket No. A-2017-2618301 be closed.

BY THE COMMISSION,



Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: October 5, 2017

ORDER ENTERED: October 5, 2017

SECTION 11
Updated Affidavits

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Texas :

ss. **Houston**

County of Harris :

Matt Oberle, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Managing Member (Office of Affiant) of Electricity Ratings, LLC (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein **Electricity Ratings, LLC** has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein **Electricity Ratings, LLC** has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein **Electricity Ratings, LLC** acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein **Electricity Ratings, LLC** acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

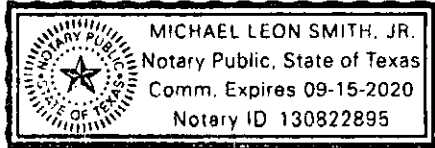
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Handwritten Signature]
Signature of Affiant

Sworn and subscribed before me this 20th day of JANUARY, 2018.

[Handwritten Signature]
Signature of official administering oath

My commission expires 9/15/2020.



RECEIVED
JAN 23 2018
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Texas :

ss. **Houston**

County of Harris :

Matt Oberle, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

He is the Managing Member of Electricity Ratings, LLC

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Electricity Ratings, LLC, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That Electricity Ratings, LLC, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That Electricity Ratings, LLC, the Applicant herein, certifies to the Commission that it is subject to, will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 22 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28 shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional natural gas sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That Electricity Ratings, LLC, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 and the standards and billing practices of 52 PA. Code Chapter 56.

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



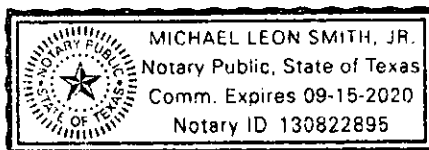
Signature of Affiant

Sworn and subscribed before me this 20TH day of JANUARY, 2018.



Signature of official administering oath

My commission expires Michael Leon Smith, Jr. ^{MCS, JR} 9/15/2020.



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JAN 23 2018
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SECRETARY'S BUREAU

ORIGIN ID:FBTA (212) 590-0145
NATARA FELLER
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159 20TH ST.
SUITE 1B
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UNITED STATES US

SHIP DATE: 23 JAN 18
ACTWGT: 0.30 LB
CAD: 103874883/INET3980
BILL SENDER

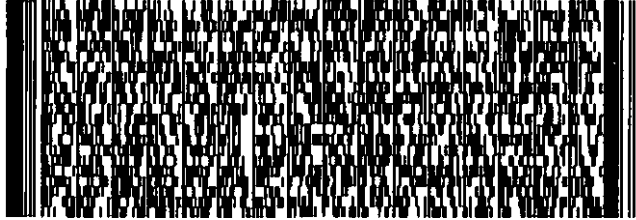
TO **SECRETARY**
PENNSYLVANIA PUBLIC UTILITY COMMISS
400 NORTH STREET
KEYSTONE BUILDING
HARRISBURG PA 17120

562.116040DC06

(717) 783-5242
INV.
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REF: ER PA REQUESTED DATA

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WED - 24 JAN 3:00P

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