

CRIMSON POWER
Solutions

March 8, 2019

TO: Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA

CC: Jeff McCracken
Bureau of Technical Utility Services

RE: Response to Electric Generation Supplier License Application Letter to Crimson Power Solutions, LLC
(Docket No. A-2019-3007565)

Dear Madam Secretary,

In response to the above mentioned letter, dated February 14, 2019, please find below the requested information to complete the application for the Natural Gas Supplier License that Crimson Power Solutions, LLC filed on January 22, 2019.

1. Reference Application, Section 2.b, Formation Documents – Applicant failed to provide limited liability company formation documentation.

See attached Exhibit 1 – Amendment to Section 2.b, Formation Documents, for missing documents.

2. Reference Application, Section 7.b, Financial Fitness – Applicant failed to provide sufficient documentation to demonstrate financial fitness.

Per Mr. McCracken, see attached Exhibit 2 – Amendment to Section 7.b Financial Fitness, for Dr. Kelly's 3 recent consecutive months of bank statements.

3. Reference Application, Section 7.f, Taxation – Applicant failed to provide a Revenue ID Number

See attached Exhibit 3 – Amendment to section 7.f, Taxation for a revised Tax Certification Statement.

4. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide a license for each state or commonwealth in which it is licensed to operate in the electric or natural gas industries.

See attached Exhibit 4 – Amendment to section 8.a, Technical Fitness for missing documents.

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5. Reference Application, Section 11.b, Operations Affidavit – The Applicant submitted the Operations Affidavit from the natural gas supplier application.

See attached Exhibit 5 – Amendment to section 11.b, Operations Affidavit for a copy of the correct Operations Affidavit. Please note that the original was placed with the natural gas supplier application (Docket No. A-201-3007563).

I, Peter C. Schmitt, 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).



PETER SCHMITT
Vice President

CRIMSON POWER *Solutions*

110 State Road, Suite 8
Sagamore Beach, MA 02562
c. 585.208.2448
o. 774.413.5334 Ext. 3
f. 774.413.9781
pschmitt@crimsonpowersolutions.com
www.crimsonpowersolutions.com

Exhibit 1 – Amendment to Section 2.b, Formation Documents

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The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

Secretary of the Commonwealth, Corporations Division
 One Ashburton Place, 17th floor
 Boston, MA 02108-1512
 Telephone: (617) 727-9640

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001320727

1. The exact name of the limited liability company is: CRIMSON POWER SOLUTIONS, LLC

2a. Location of its principal office:

No. and Street: 20 OLD COUNTY ROAD
 City or Town: EAST SANDWICH State: MA Zip: 02537 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 20 OLD COUNTY ROAD
 City or Town: EAST SANDWICH State: MA Zip: 02537 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:

CRIMSON POWER SOLUTIONS IS A LIMITED LIABILITY COMPANY ORGANIZED TO RENDER ENERGY CONSULTING SERVICES TO COMMERCIAL, INDUSTRIAL CUSTOMERS.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: DR. KEVIN JOSEPH KELLY, CEO
 No. and Street: 20 OLD COUNTY ROAD
 City or Town: EAST SANDWICH State: MA Zip: 02537 Country: USA

I, DR. KEVIN JOSEPH KELLY resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	KEVIN JOSEPH KELLY	20 OLD COUNTY ROAD EAST SANDWICH, MA 02537 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	KEVIN JOSEPH KELLY	20 OLD COUNTY ROAD EAST SANDWICH, MA 02537 USA

9. Additional matters:

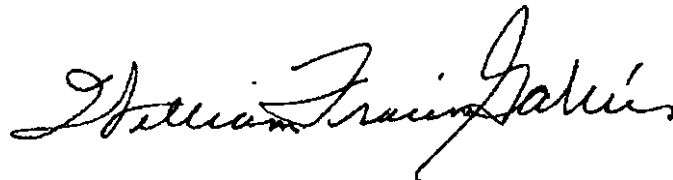
**SIGNED UNDER THE PENALTIES OF PERJURY, this 2 Day of April, 2018,
DR. KEVIN JOSEPH KELLY**

(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

April 02, 2018 02:34 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, prominent initial "W".

WILLIAM FRANCIS GALVIN

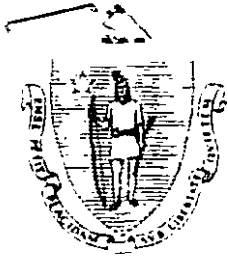
Secretary of the Commonwealth

Exhibit 4 – Amendment to section 8.a, Technical

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THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

CHARLES D. BAKER
GOVERNOR

KARYN E. POLITO
LIEUTENANT GOVERNOR

MATTHEW A. BEATON
SECRETARY OF ENERGY
AND ENVIRONMENTAL AFFAIRS

ONE SOUTH STATION
BOSTON, MA 02110
(617) 305-3500

ANGELA M. O'CONNOR
CHAIRMAN

ROBERT E. HAYDEN
COMMISSIONER

CECILE M. FRASER
COMMISSIONER

September 10, 2018

Kevin Joseph Kelly
Crimson Power Solutions, LLC
110 State Road, Suite 8
Sagamore Beach, MA 02562

RE: Electricity Broker License Application

Dear Mr. Kelly,

The Department of Public Utilities ("Department") has reviewed the application of Crimson Power Solutions, LLC ("Crimson" or "Company") for an Electricity Broker license in the Commonwealth of Massachusetts, and is pleased to inform you that the Department has approved the application. Crimson's license number is **EB-457**.

Consistent with the information provided in Crimson's application, the activities the Company is licensed to provide are limited to electricity broker services to commercial and industrial customers. If, at a later date, the Company seeks to provide electricity broker services to residential customers, it must first seek and obtain Department approval when renewing its license.

As a condition of maintaining this license, Crimson must comply with all relevant requirements of G.L. c. 164 and the regulations promulgated thereunder, including 220 CMR 11.00, 12.00 *et seq.* In addition, within 30 days of any material change in the information required by 220 CMR 11.05(2), the Company must file updated information

FILE

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

Certificate Number:
19-1357E (1)

Issued Pursuant to Case Number(s):
18-1846-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to, **Crimson Power Solutions, LLC** whose office or principal place of business is located at **110 State Road, Suite 8, Sagamore Beach, MA 02562** to provide power broker services within the State of Ohio effective **January 17, 2019**.

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.

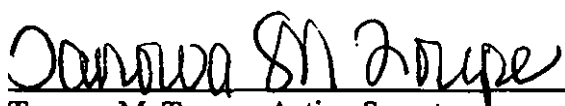
This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

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: January 17, 2019

By Order of
 PUBLIC UTILITIES COMMISSION OF OHIO



 Tanowa M. Troupe, Acting Secretary
 Susan Patterson, Acting Secretary
 Beverly Hoskinson, Acting Secretary

Certificate Expires: January 17, 2021

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.
 Technician AM Date Processed JAN 17 2019

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 2018-00206

January 31, 2019

CRIMSON POWER SOLUTIONS
Application for License to Operate
As A Competitive Electricity Provider

ORDER GRANTING LICENSE

VANNOY, Chairman; WILLIAMSON and DAVIS, Commissioners

I. SUMMARY

Through this Order, the Commission issues Crimson Power Solutions, LLC (Crimson or the Company) a license to operate as a competitive electricity provider (CEP) furnishing aggregator/broker services to the non-residential customer classes throughout Central Maine Power Company and Emera Maine's service territories pursuant to Chapter 305 of the Commission's Rules. The License for service is conditioned upon Crimson submitting within 12 months after the license issuance date, a copy of its financial statements or a filing indicating why these documents are not available.

II. APPLICATION AND DECISION

On July 31, 2018, Crimson applied to the Commission to operate in Maine as a CEP pursuant to Chapter 305. The Company proposes to provide aggregator/broker service to the non-residential customer classes throughout Central Maine Power Company and Emera Maine's service territories. Upon filing its application, Crimson informed the Commission that it was unable to provide, as required by section 2(B)(1) of Chapter 305, copies of its most recent financial disclosures. With regard to demonstrating financial capability, Crimson states it does not have a corporate parent since the company is newly formed. Thus, subject to the condition set forth below, Crimson has met all the Chapter 305 filing requirements.

As a licensed CEP, Crimson is required to comply with all applicable requirements and regulations, including all conditions of licensing, assignments, customer protection rules, and the filing of annual reports. To the extent that a licensed CEP uses third-parties to assist in obtaining customers during the course of its business, Chapter 305 § 4(C) of the Commission's rules places the responsibility on the CEP for violations of the provisions of this section by representatives or agents acting on the CEP's behalf. Chapter 305 § 2(C)(3) also requires a CEP to use reasonable efforts to avoid conducting business with any entity acting as a CEP in Maine without a license from the Commission. Therefore, if the Company uses a third party to market its services, it is responsible to ensure that the third party has met any licensing requirements of the Commission.

Pursuant to a Delegation Order dated April 23, 2008 in Docket No. 2008-185, *PUBLIC UTILITIES COMMISSION, Delegation of Authority to License Competitive Electricity Providers*, the Commission delegated to the Director of Technical Analysis the authority under 35-A M.R.S. §§ 3203 (1) & (2) and Chapter 305, § 2 to license CEPs. The Commission no longer has a Director of Technical Analysis and all existing delegation orders that delegate Commission authority to the Director of Technical Analysis is now delegated to the Director of Electric and Gas Utility Industries.

Accordingly, it is

ORDERED

1. That Crimson Power Solutions, LLC is hereby issued a license to operate as a CEP pursuant to Chapter 305 of the Commission's Rules, to provide aggregator/broker services to the non-residential customer classes throughout Central Maine Power Company and Emera Maine's service territories pursuant to Chapter 305 of the Commission's Rules; and
2. That Crimson Power Solutions, LLC submit no later than January 31, 2020, a copy of its financial statements or a filing indicating why these documents are not available.
3. That this license is effective on the date of this Order and valid until revoked or suspended by the Commission pursuant to section 3(A)(4) of Chapter 305, or abandoned by the licensee pursuant to sections 2(D)(10) and 2(D)(11) of Chapter 305 of the Commission's Rules.

Dated at Hallowell, Maine, this 31st day of January, 2019.

BY ORDER OF THE DIRECTOR OF ELECTRIC AND GAS UTILITY INDUSTRIES



Faith Huntington

NOTICE OF RIGHTS TO REVIEW OR APPEAL

5 M.R.S. § 9061 requires the Public Utilities Commission to give each party to an adjudicatory proceeding written notice of the party's rights to review or appeal of its decision made at the conclusion of the adjudicatory proceeding. The methods of review or appeal of PUC decisions at the conclusion of an adjudicatory proceeding are as follows:

1. Reconsideration of the Commission's Order may be requested under Section 1004 of the Commission's Rules of Practice and Procedure (65-407 C.M.R.110) within 20 days of the date of the Order by filing a petition with the Commission stating the grounds upon which reconsideration is sought. Any petition not granted within 20 days from the date of filing is denied.
2. Appeal of a final decision of the Commission may be taken to the Law Court by filing, within 21 days of the date of the Order, a Notice of Appeal with the Administrative Director of the Commission, pursuant to 35-A M.R.S. § 1320(1)-(4) and the Maine Rules of Appellate Procedure.
3. Additional court review of constitutional issues or issues involving the justness or reasonableness of rates may be had by the filing of an appeal with the Law Court, pursuant to 35-A M.R.S. § 1320(5).

Note: The attachment of this Notice to a document does not indicate the Commission's view that the particular document may be subject to review or appeal. Similarly, the failure of the Commission to attach a copy of this Notice to a document does not indicate the Commission's view that the document is not subject to review or appeal.

THE STATE OF NEW HAMPSHIRE

CHAIRMAN
Martin P. Honigberg

COMMISSIONERS
Kathryn M. Bailey
Michael S. Giaimo

EXECUTIVE DIRECTOR
Debra A. Howland



PUBLIC UTILITIES COMMISSION
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website:
www.puc.nh.gov

July 12, 2018

Kevin Joseph Kelly, CEO
Crimson Power Solutions, LLC
20 Old County Road
East Sandwich, MA 02537

Re: DM 18-060 Crimson Power Solutions, LLC
Application to Register as Provider of Electric Aggregation Service

Dear Mr. Kelly:

On June 11, 2018, Crimson Power Solutions, LLC (Crimson Power) submitted an application with the Commission to register as a provider of electric aggregation service. Staff reviewed the application and determined that it is complete.

Commission Staff filed a memorandum on July 11, 2018 recommending approval of Crimson Power's registration application for a two-year term beginning on the date of the Executive Director's approval letter, pursuant to N.H. Code Admin. Rules Puc 2003.05(g)(1).

Your application for registration is approved effective as of July 11, 2018, under Puc 2003.05(g)(1). The registration is for a term of two years and expires at the close of business on July 11, 2020. Pursuant to Puc 2003.06(a), you must submit your renewal application at least 60 days prior to the expiration of the approved registration term, on or before May 12, 2020.

Please be aware that registered providers of electric aggregation service are subject to specific requirements contained in N.H. Code Admin. Rules Puc 2000 – Competitive Electric Power Supplier and Aggregator Rules. These rules are available at:
<http://www.puc.nh.gov/Regulatory/Rules/PUC2000.pdf>.

Please note that, effective as of July 1, 2014, each registered electric load aggregator is subject to an annual assessment of \$2,000, unless it demonstrates that its gross revenue in New Hampshire during the preceding fiscal year (from July 1 through June 30) was less than \$10,000, pursuant to RSA 363-A:2, III and 5.

Sincerely,

A handwritten signature in black ink that reads "Debra A. Howland".

Debra A. Howland
Executive Director

cc: Service List/Docket File

Exhibit 5 – Amendment to section 11.b, Operations Affidavit

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SECRETARY'S BUREAU

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Massachusetts :

ss.

COPY

County of Barnstable :

Dr. Kevin J. Kelly , Affiant, being duly [sworn/affirmed] according to law,
deposes and says that:

[He/she is the President + CEO (Office of Affiant) of Crimson Power Solutions, LLC
(Name of Applicant);]

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

That Crimson Power Solutions, 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 Crimson Power Solutions, LLC , the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render electric 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 Crimson Power Solutions, 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 28 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 Gross Receipts and power 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).

As provided by 66 Pa. C.S. §2810 (C)(6)(iv), 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.

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OPERATIONS AFFIDAVIT (Continued)

COPY

That Crimson Power Solutions, LLC, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506, §2807 (C), §2807(D)(2), §2809(B) and the standards and billing practices of 62 PA. Code Chapter 56.

That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Bureau of Public Liaison 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.

[Handwritten Signature]
Signature of Affiant

Sworn and subscribed before me this 15th day of January, 2019.

[Handwritten Signature]
Signature of official administering oath

My commission expires 9/14/23



MICHELLE ALDRICH
Notary Public
Commonwealth of Massachusetts
My Commission Expires September 14, 2023

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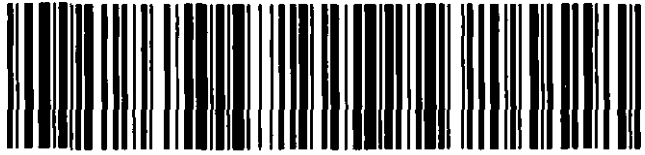
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CRIMSON POWER
Solutions

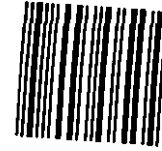
110 State Road, Suite 8
Sagamore Beach, MA 02562

TO:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120



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