



**JMI Consultants, LLC
2809 Wehrle Dr, Suite 9
Williamsville, NY 14221
(716) 428-3501**

March 13, 2019

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

Re: Application of JMI Consultants, LLC for Parties Wishing to Offer, Render, Furnish, or Supply Electricity of Electric Generation Services to the Public in the Commonwealth of Pennsylvania

Dear Sir or Madam,

Enclosed, please find JMI Consultants, LLC's ("JMI") Application for a for Parties Wishing to Offer, Render, Furnish, or Supply Electricity of Electric Generation Services to the Public in the Commonwealth of Pennsylvania.

Separately, JMI has sent a Money Order in the amount of \$350 for the Initial Filing Fee and the original version of the bond/letter of credit/parental guarantee to the Pennsylvania Public Utility Commission Secretary at the address listed above.

If you have any questions regarding JMI's submission, please do not hesitate to contact me directly at the contact information listed below. Thank you for your attention to this matter and we look forward to expanding our offering to the Commonwealth of Pennsylvania.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Matthew LaFlair', with a horizontal line extending to the right.

Matthew LaFlair, CFO
JMI Consultants, LLC
Phone: 716-428-3501
Matthew.laflair@jmiconsultants.com

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of JMI Consultants, LLC, d/b/a _____, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) [as specified in item #4b below] to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

- a. **IDENTITY OF THE APPLICANT:** Provide name (*including any fictitious name or d/b/a*), primary address, web address, and telephone number of Applicant:

JMI Consultants, LLC
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
716-428-3501

- b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

Harbor Business Compliance Corporation
1830 Colonial Village Lane
Lancaster, PA 17601
Ph: 888-995-5895
Fax: 717-202-2576

- c. **REGULATORY CONTACT:** Provide the name, title, address, telephone number, fax number, and e-mail address of the person to whom questions about this Application should be addressed.

Matthew LaFlair - CFO
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
P: 315-440-7786

- d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

Applicant is not using an attorney.

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS: (Required of ALL Applicants)** Provide the name, title, address, telephone number, FAX number, and e-mail **OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED)** responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Electric Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed EGSs.

Matthew LaFlair - CFO
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
P: 315-440-7786

Jessica Rosenberg - COO
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
P: 716-345-6088

2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as ("d/b/a")

Provide a copy of the Applicant's filing with Pennsylvania's Department of State pursuant to 54 Pa. C.S. §311, Form PA-953.

or

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**

(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)

The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.

or

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- * If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

or

The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.

Please see Exhibit 1 for Foreign Registration statement filed with the Pennsylvania Department of State on February 15, 2019

- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.

Applicant is organized in the State of New York. Please see Exhibit 2 for LLC registration.

- Give name and address of officers.

Matthew LaFlair
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221

Ian Finn
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221

Jessica Rosenberg
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

- a. **AFFILIATES:** Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

Applicant has no affiliates.

- b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

Applicant has no Predecessors.

4. OPERATIONS

a. **APPLICANT'S PRESENT OPERATIONS:** *(select and complete the appropriate statement)*

Definitions

- Supplier – an entity that sells electricity to end-use customers utilizing the jurisdictional transmission and distribution facilities of an EDC.
- Aggregator - an entity that purchases electric energy and takes title to electric energy as an intermediary for sale to retail customers.
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of electric energy but does not take title to electric energy.

The Applicant is presently doing business in Pennsylvania as a

- municipal electric corporation
- electric cooperative
- local gas distribution company
- provider of electric generation, transmission or distribution services
- broker/marketer engaged in the business of supplying electricity services
- Other; Identify the nature of service being rendered.

OR

The Applicant is not presently doing business in Pennsylvania.

b. **APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a *(may check multiple)*:

- Generator of electricity
- Supplier of electricity
- Aggregator engaged in the business of supplying electricity
- Broker/Marketer engaged in the business of supplying electricity services
 - Check here to verify that your organization will not be taking title to the electricity nor will you be making payments for customers.
- Electric Cooperative and supplier of electric power
- Other (Describe):

- c. **PROPOSED SERVICES:** Describe in detail the electric services or the electric generation services which the Applicant proposes to offer.

Applicant intends to provide traditional electricity brokering services within the Commonwealth. We will be working with customers to identify the most advantageous electricity supply options through a group of pre-vetted electric suppliers. We will not take title to the electricity and will not be making payments for customers.

- d. **PROPOSED SERVICE AREA:** Check the box of each Electric Distribution Company for which the Applicant proposes to provide service.

- | | |
|---------------------------------------------|---------------------------------------------------------------|
| <input type="checkbox"/> Citizens' Electric | <input type="checkbox"/> Pike |
| <input type="checkbox"/> Duquesne Light | <input type="checkbox"/> PPL |
| <input type="checkbox"/> Met-Ed | <input type="checkbox"/> UGI Utilities |
| <input type="checkbox"/> PECO | <input type="checkbox"/> Wellsboro |
| <input type="checkbox"/> Penelec | <input type="checkbox"/> West Penn |
| <input type="checkbox"/> Penn Power | |
| | <input checked="" type="checkbox"/> Entire Commonwealth of PA |

- e. **CUSTOMERS:** Applicant proposes to provide services to:

- | | |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | Residential Customers |
| <input type="checkbox"/> | Small Commercial Customers - (25 kW and Under) |
| <input type="checkbox"/> | Residential and Small Commercial as Mixed Meter <u>ONLY</u> (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE) |
| <input type="checkbox"/> | Large Commercial Customers - (Over 25 kW) |
| <input type="checkbox"/> | Industrial Customers |
| <input type="checkbox"/> | Governmental Customers |
| <input checked="" type="checkbox"/> | All of above (Except Mixed Meter) |
| <input type="checkbox"/> | Other (Describe): |

- f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

Applicant intends to begin actively marketing customers immediately upon approval from the PA PUC.

5. COMPLIANCE

- a. **CRIMINAL/CIVIL PROCEEDINGS:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such.

Applicant has no proceedings to report.

- b. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any such proceedings listed above.

Not Applicable

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints, in the Commonwealth of Pennsylvania or any state, filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. **Applicant should also include if it had a Pennsylvania PUC EGS or NGS license previously cancelled by the Commission.** If the Applicant has no actions or complaints to list, explicitly state such.

Applicant has no actions or complaints to list.

- d. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above.

Not Applicable

6. PROOF OF SERVICE

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.
(Example Certificate of Service is attached at Appendix C)

- a. **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Office of the Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

- b. **EDCs:** Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Electric Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each EDC is as follows.

Pike County Light & Power Company:
Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

West Penn:
Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

PECO:
Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Duquesne Light:
Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

PPL:
Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

Met-Ed, Penelec, and Penn Power:
Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

UGI:
UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, Pa 19612-2677

Citizens' Electric Company:
Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Wellsboro Electric Company:
Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

7. FINANCIAL FITNESS

a. **BONDING:** In accordance with 66 Pa. C.S. Section 2809(c)(1)(i), the Applicant is required to file a bond or other instrument to ensure its financial responsibilities and obligations as an EGS. Therefore, the Applicant is...

- Furnishing the **ORIGINAL** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$250,000.
- Furnishing the **ORIGINAL** of another initial security for Commission approval, to ensure financial responsibility, such as a parental guarantee, in the amount of \$250,000.
- For Marketers and Brokers** - Filing for a modification to the \$250,000 requirement and furnishing the **ORIGINAL** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$10,000. Applicant is required to provide information supporting an amount less than \$250,000. Such supporting information must include indication that the Applicant will not take title to electricity and will not pay electricity bills on behalf of its customers. Further details for modification may be described as well.

CRITICAL BONDING NOTES:

Applicant is required to maintain a bond or other financial instrument the entire time it maintains an EGS license with the Commonwealth of Pennsylvania. If Applicant's security instrument is not continuous, Applicant **MUST** submit a Rider, Amendment, or Continuation Certificate annually based on the expiration date of its security instrument.

At least sixty days (60) prior to the security instrument's expiration date, Applicant should contact Stephen Jakab at sjakab@pa.gov to determine the appropriate bonding amount based on a percentage of Applicant's gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. Once the amount has been determined, Applicant should overnight the updated security instrument(s) at least thirty (30) days prior to the expiration date to ensure adequate time for staff review and approval of the security instrument(s).

Template versions of a continuous bond, fixed-term bond, continuous letter of credit, and parental guarantee are attached at Appendix E, F, G, & H, respectively. Applicant's security must follow language from these examples, and must include the unmodified language outlined in Appendix D. Any deviation from these examples must be identified in the application and may not be acceptable to the Commission.

- b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:

Please see Exhibit 4 for additional information regarding the financial fitness of Applicant.

- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.
- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)
- Applicant's accounting statements, including balance sheet and income statements for the past two years.
- Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports.
- A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee.

Applicant maintains substantial Business Liability Insurance (\$2MM/occurrence \$4MM/annual), sufficient to perform its obligations as a Broker/Marketer within the commonwealth.

- Audited financial statements exhibiting accounts over a minimum two year period.

Applicant is a relatively new business, and as such, cannot produce financial statements over a two year period.

- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

If necessary, financial documentation may be submitted confidentially, demonstrating the financial fitness of the Applicant's Principal Officers.

- c. **SUPPLIER FUNDING METHOD:** If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.

Not Applicable

- d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.

Applicant will collect its fees from the suppliers involved in the transactions with its customers.

- e. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

**Matthew LaFlair - CFO
2809 Wehrle Dr, Suite 9
Williamsville, NY 14221
matthew.laflair@jmiconsultants.com
315-440-7786**

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix I to this application.

All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by electric utilities does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

a. EXPERIENCE, PLAN, STRUCTURE: such information may include:

- Applicant's previous experience in the electricity industry.
- Summary and proof of licenses as a supplier of electric services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

Please see Exhibit 5 for Applicant's relevant Experience, Plan, and Structure to demonstrate Technical Fitness to perform services proposed to be provided within the Commonwealth of Pennsylvania.

b. PROPOSED MARKETING METHOD (*check all that apply*)

- Internal – Applicant will use its own internal resources/employees for marketing
- External EGS – Applicant will contract with a PUC **LICENSED EGS** broker/marketer
- Affiliate – Applicant will use a **NON-EGS** affiliate marketing company and or individuals.
- External Third-Party – Applicant will contract with a **NON-EGS** third party marketing company and or individuals
- Other (Describe):

c. DOOR TO DOOR SALES: Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

Applicant will use extreme care and caution to ensure all marketing efforts are performed in an ethical manner. Any employees who will have contact with customers within the Commonwealth will be fully screened to ensure persons have no previous allegations of unethical business practices. All staff attend weekly training sessions in order to familiarize and update staff with current energy market trends.

Applicant's Principal Officers will be involved in review and approval of any marketing collateral being furnished for customers. Their previous experience within the Commonwealth will ensure accuracy and ethical business practices.

e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience.

Matthew LaFlair - Chief Financial Officer

Jessica Rosenberg - Chief Operating Officer

Resumes of each officer directly responsible for operations of the Applicant are included as Exhibit 6 and 6.A.

f. **FERC FILING:** Applicant has:

Filed an Application with the Federal Energy Regulatory Commission to be a Power Marketer.

Received approval from FERC to be a Power Marketer at Docket or Case Number _____.

Not applicable

9. DISCLOSURE STATEMENTS:

Disclosure Statements: If proposing to serve Residential and/or Small Commercial (under 25 kW) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix J to this Application.

- Electricity should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.

Not applicable for an applicant applying for a license exclusively as a broker/marketer.

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

a. **PJM LOAD SERVING ENTITY REQUIREMENT:** As a prospective EGS, the applicant understands that those EGSs which provide retail electric supply service (i.e. takes title to electricity) must provide either:

- proof of registration as a PJM Load Serving Entity (LSE), or
- proof of a contractual arrangement with a registered PJM LSE that facilitates the retail electricity services of the EGS.

The Applicant understands that compliance with this requirement must be filed within 120 days of the Applicant receiving a license. As well, the Applicant understands that compliance with this requirement may be filed with this instant application.

(Select only one of the following)

- AGREED - Applicant has included compliance with this requirement in the instant application, labeled in correspondence with this section (10).
- AGREED - Applicant will provide compliance with this requirement within 120 days of receiving its license
- ACKNOWLEDGED - Applicant is not proposing to provide retail electric supply service at this time, and therefore is not presently obligated to provide such information

b. STANDARDS OF CONDUCT AND DISCLOSURE: As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 54.43, as well as any future amendments.

AGREED

c. REPORTING REQUIREMENTS: Applicant agrees to provide the following information to the Commission or the Department of Revenue, as appropriate:

- Retail Electricity Choice Activity Reports: The regulations at 52 Pa. Code §§ 54.201--54.204 require that all active EGSs report sales activity information. An EGS will file an annual report reporting for customer groups defined by annual usage. Reports must be filed using the appropriate report form that may be obtained from the PUC's Secretary's Bureau or the forms officer, or may be down-loaded from the PUC's internet web site.
- Reports of Gross Receipts: Applicant shall report its Pennsylvania intrastate gross receipts to the Commission on a quarterly and year to date basis no later than 30 days following the end of the quarter.
- The Treasurer or other appropriate officer of Applicant shall transmit to the Department of Revenue by March 15, an annual report, and under oath or affirmation, of the amount of gross receipts received by Applicant during the prior calendar year.
- Net Metering Reports: Applicant shall be responsible to report any Net Metering per the Standards on http://www.puc.pa.gov/consumer_info/electricity/alternative_energy.aspx. Scroll down to the Net Metering Standards Section.
- Applicant shall report to the Commission the percentages of total electricity supplied by each fuel source on an annual basis per 52 Pa. Code § 54.39(d).
- Applicant will be required to meet periodic reporting requirements as may be issued by the Commission to fulfill the Commission's duty under Chapter 28 pertaining to reliability and to inform the Governor and Legislature of the progress of the transition to a fully competitive electric market.

AGREED

- d. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. Section 2809(D). Transferee will be required to file the appropriate licensing application.

AGREED

- e. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling electricity in the Commonwealth of PA, and an annual supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.

ACKNOWLEDGED

- f. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 54.34.

AGREED

- g. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.

AGREED

- h. **NOTIFICATION OF CHANGE:** If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within twenty (20) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 54.34.

AGREED

- i. **CEASING OF OPERATIONS:** Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.

AGREED

- j. **Electronic Data Interchange:** The Applicant acknowledges the Electronic Data Interchange (EDI) requirements and the relevant contacts for each EDC, as listed at Appendix M.

AGREED

- k. **FILING FEE:** The Applicant has enclosed or paid the required, non-refundable filing fee by **CERTIFIED CHECK OR MONEY ORDER** in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. The Commission does not accept corporate or personal checks for filing fees.

PAYMENT ENCLOSED

11. AFFIDAVITS

Must be notarized before filing.

- a. **APPLICATION AFFIDAVIT:** Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.
- b. **OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the reliability protocols of the North American Electric Reliability Council, the appropriate regional reliability council(s), and the Commission, and that you agree to comply with the operational requirements of the control area(s) within which you provide retail service. An example copy of this Affidavit can be found at Appendix B.

12. NEWSPAPER PUBLICATIONS

Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.


The chart below dictates which newspapers are necessary for each EDC. For example, an applicant that wants to operate in Penn Power would need to run ads in both The Erie Times-News and the Pittsburgh Post-Gazette. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and must be supplied with this application. Applicants do not need a docket number in their publication. Docket numbers will be issued when all criteria on the item 14 checklist (see below) are satisfied.

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Citizens' Electric						X	
Duquesne				X			
Met Ed		X	X		X		
PECO			X				
Penelec	X	X			X	X	X
Penn Power	X			X			
Pike					X		
PPL		X	X		X	X	
UGI					X		
Wellsboro						X	
West Penn		X		X		X	X
Entire Commonwealth	X	X	X	X	X	X	X

(Example Publications are provided at Appendices K and L)

13. SIGNATURE

Applicant: JMI Consultants, LLC
 By: 
 Title: Chief Financial Officer

14. CHECKLIST

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections are complete.

Applicant: JMI Consultants, LLC

Applicant's Use	M	Signature		PUC Secretary's Bureau Use
	M	Filing Fee (CERTIFIED CHECK OR MONEY ORDER ONLY)		
	M	Application Affidavit		
	M	Operations Affidavit		
	M	Proof of Publication		
	M	Bond, Letter of Credit, or Parental/Affiliate Guarantee		
	M	Tax Certification Statement		
	M	Commonwealth Department of State Verification		
	M	Certificate of Service		



Exhibit 1 – Foreign Registration Statement

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS
401 NORTH STREET, ROOM 206
P.O. BOX 8722
HARRISBURG, PA 17105-8722
WWW.CORPORATIONS.PA.GOV

Matthew LaFlair
2809 Wehrle Dr Suite 9
WILLIAMSVILLE NY 14221

JMI Consultants, LLC

THE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS IS HAPPY TO SEND YOUR FILED DOCUMENT. THE BUREAU IS HERE TO SERVE YOU AND WE WOULD LIKE TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.


IF YOU HAVE ANY QUESTIONS PERTAINING TO THE BUREAU, PLEASE VISIT OUR WEBSITE AT www.dos.pa.gov/BusinessCharities OR YOU MAY CONTACT US BY TELEPHONE AT (717)787-1057. INFORMATION REGARDING BUSINESS AND UCC FILINGS CAN BE FOUND ON OUR SEARCHABLE DATABASE AT www.corporations.pa.gov/Search/CorpSearch.

ENTITY NUMBER : 6838529

Exhibit 1 (Cont) – Foreign Registration Statement

Entity# : 6838529
Date Filed : 02/15/2019
Pennsylvania Department of State

**PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

<p>Document will be returned to the name and address entered below. Matthew LaFlair</p> <hr/> <p>Name 2809 Wehrle Dr., Suite 9</p> <hr/> <p>Address WILLIAMSVILLE NY 14221</p> <hr/> <p>City State Zip Code</p>	<p>Foreign Registration Statement DSCB: 15-412 (rev. 2/2017)</p>  <p>412</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov>.

Fee: \$250.00 I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):

- | | | |
|---------------------------------------------------------------|------------------------------------------------------------------|---------------------------------------------------|
| <input type="checkbox"/> Business Corporation | <input type="checkbox"/> Limited Partnership | <input type="checkbox"/> Business Trust |
| <input type="checkbox"/> Nonprofit Corporation | <input type="checkbox"/> Limited Liability (General) Partnership | <input type="checkbox"/> Professional Association |
| <input checked="" type="checkbox"/> Limited Liability Company | <input type="checkbox"/> Limited Liability Limited Partnership | |

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:

JMI Consultants, LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation:

NY

4. The street and mailing address of the association's principal office.

2809 Wehrle Dr, Suite 9	Williamsville	NY	14221
Number and street	City	State	Zip

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association's jurisdiction of formation in that jurisdiction:

W

Number and street	City	State	Zip



Exhibit 2 – New York LLC Articles of Organization

**ARTICLES OF ORGANIZATION
OF
JMI Consultants LLC**

Under Section 203 of the Limited Liability Company Law

- FIRST:** The name of the limited liability company is:
JMI Consultants LLC
- SECOND:** To engage in any lawful act or activity within the purposes for which limited liability companies may be organized pursuant to Limited Liability Company Law provided that the limited liability company is not formed to engage in any act or activity requiring the consent or approval of any state official, department, board, agency, or other body without such consent or approval first being obtained.
- THIRD:** The county, within this state, in which the office of the limited liability company is to be located is NIAGARA.
- FOURTH:** The Secretary of State is designated as agent of the limited liability company upon whom process against it may be served. The address within or without this state to which the Secretary of State shall mail a copy of any process against the limited liability company served upon him or her is:

Matthew LaFlair
6447 Rapids Road
Lockport, NY 14094
- FIFTH:** The limited liability company shall have a perpetual existence.

I certify that I have read the above statements, I am authorized to sign these Articles of Organization, that the above statements are true and correct to the best of my knowledge and belief and that my signature typed below constitutes my signature.

Michael J. Wrona, Organizer (signature)

Michael J. Wrona, ORGANIZER
484 Delaware Avenue
Buffalo, NY 14202



Exhibit 2 (Cont) – New York LLC Articles of Organization

N.Y.S. DEPARTMENT OF STATE
DIVISION OF CORPORATIONS AND STATE RECORDS ALBANY, NY 12231-0001

ONLINE FILING RECEIPT

=====

ENTITY NAME: JMI CONSULTANTS LLC

DOCUMENT TYPE: ARTICLES OF ORGANIZATION (DOM. LLC) COUNTY: NIAG

=====

FILED:01/15/2019 DURATION:***** CASH#:190115010397 FILE#:190115010397
DOS ID:5475977

FILER: _____ EXIST DATE _____
MICHAEL J WRONA 01/15/2019
484 DELAWARE AVENUE
BUFFALO, NY 14202

ADDRESS FOR PROCESS: _____
MATTHEW LAPLAIR
6447 RAPIDS ROAD
LOCKPORT, NY 14094

REGISTERED AGENT: _____



The limited liability company is required to file a Biennial Statement with the Department of State every two years pursuant to Limited Liability Company Law Section 301. Notification that the Biennial Statement is due will only be made via email. Please go to www.email.biennial.dos.ny.gov to provide an email address to receive an email notification when the Biennial Statement is due.

=====

SERVICE COMPANY: ** NO SERVICE COMPANY **
SERVICE CODE: 00

FEE:	210.00	PAYMENTS	210.00
FILING:	200.00	CHARGE	210.00
TAX:	0.00	DRAWDOWN	0.00
PLAIN COPY:	0.00		
CERT COPY:	10.00		
CERT OF EXIST:	0.00		

=====

DOS-1025 (04/2007)

Authentication Number: 1901150516 To verify the authenticity of this document you may access the Division of Corporation's Document Authentication Website at <http://ecorp.dos.ny.gov>



Exhibit 3 – Proof of Service

CERTIFICATE OF SERVICE

On this the 13th day of March 2019, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as an Electric Generation Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

First Energy
2800 Pottsville Pike
Reading PA, 19612

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, Pa 19612-2677

Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

**Matthew LaFlair, CFO
JMI Consultants, LLC**



Exhibit 4 – Financial Records, Statements, and Ratings

JMI Consultants, LLC (“JMI”) is a New York Limited Liability Company, wholly owned by its Principal Officers having substantial experience and technical fitness within the deregulated energy industry, specifically within the Commonwealth of Pennsylvania. Applicant is a relatively newly formed organization with no business activity outside of organization and staffing. If necessary, financial documentation can be submitted under seal demonstrating the financial fitness of JMI’s Principal Officers.



Exhibit 5 – Technical Fitness, Experience, Plan and Structure

JMI Consultants, LLC (JMI) was founded in February 2019 by three market veterans with extensive experience in the deregulated energy industry, including direct experience within the Commonwealth of Pennsylvania. JMI's Principal Officers have accumulated over 25 years of industry experience between them and strive to assist customers navigate the complexities of the energy industry. Over the years, its Principal Officers have assisted some of the largest energy users in the Commonwealth of Pennsylvania.

Experience:

The Principal Officers of JMI have experience in the deregulated energy industry, previously providing brokerage services to over 3,000 commercial customers throughout the United States. Mr. LaFlair served as Manager of Energy Services at BidURenergy, Inc. (BUE) from March 2010 until January 2019, joining BUE in its infancy stage. His role at BUE included the direct oversight and management of over 50 energy professionals, supplier relations, and filing and maintenance of all required licensing within each jurisdiction BUE was registered. BUE was sold to NRG Energy, Inc. in 2013. As of January 2019, BUE had brokered hundreds of electric and natural gas supply transitions within the Commonwealth of Pennsylvania with over 30 unique suppliers. Mr. LaFlair has experience working with hundreds of thousands of annual MWh's in all deregulated states and utilities. The Association of Energy Engineers (AEE) has certified Mr. LaFlair as a Certified Energy Procurement Professional (CEP Professional).

Mr. Finn joined Energy Curtailment Specialists, Inc. (ECS) in 2007, with his most recent role at NRG as the National Sales Director at NRG Distributed Energy Resources. Throughout his tenure at NRG, Mr. Finn was directly responsible for the successful implementation of advanced procurement strategies for some of the largest energy users in the Northeast. Mr. Finn was involved with the contact, design and implementation of numerous commercial, industrial, and government customers within the Commonwealth of Pennsylvania in previous roles at ECS and NRG. Mr. Finn's extensive experience within the demand response, energy procurement, utility bill management, and distributed energy fields add to JMI's expertise and fitness to provide the proposed services in the Commonwealth of Pennsylvania. Mr. Finn has experience working with hundreds of thousands of annual MWh's in all deregulated states and utilities. The AEE has certified Mr. Finn as a Certified Energy Procurement Professional, and a Certified Energy Manager (CEM).

Ms. Rosenberg is the COO of JMI Consultants and is responsible for conducting the business' analytics and managing supplier relationships. Ms. Rosenberg previously held the position of Manager of Advisory Services at NRG Energy which put hundreds of electric transactions under her direct oversight. Ms. Rosenberg's role with the Applicant will be to supply customers with innovative and optimal solutions to meet their goals and initiatives. She is well versed with tariff rate schedules and many active suppliers serving customers within the Commonwealth of Pennsylvania. The AEE has certified Ms. Rosenberg as a Certified Energy Procurement Professional.

Through their experience, JMI's Principal Officers have established relationships with multiple third-party suppliers and have learned the many nuances between them. It is through this experience that JMI's founders decided to launch an organization to continually assist customers in navigating the industry. JMI does not represent one or two energy providers and seeks to expand their service offering through continued and new supplier relationships.



Exhibit 5 (Cont) – Technical Fitness, Experience, Plan and Structure

Structure and Plan:

JMI's Principal Officers are the main contributors to the business, each with a unique set of skills and experience adding to the effectiveness of its procurement strategies. Each Principal Officer will oversee the three primary departments structured within the business (sales, analysts, operations).

JMI seeks to simplify the process of choosing a third-party supplier through smarter, more informed decisions, rather than picking a price that simply appears favorable on a given day. Exhausting all possible scenarios and understanding each customer's goals are at the forefront of any relationship JMI has with its customers.

JMI's proposed services within the Commonwealth of Pennsylvania are similar to previous go-to-market strategies implemented by its Principal Officers in previous positions. JMI will maintain a sales team, focused on initial outreach and introduction to JMI's services. Once permission has been granted to JMI from the customer via a Letter of Authorization, JMI's Analysts will work alongside the customer to devise a customized RFP to submit to JMI's platform of pre-vetted suppliers. Once bids are received back, JMI will scrutinize the results to ensure bid parody and prepare a report to share with the customer alongside the sales rep responsible for effectively communicating throughout the process with the customer. JMI will then work on the customer's behalf to negotiate any contract changes with the supplier and ensure proper enrollment with the customer's selected supplier on the meter read date agreed to on the Transaction Confirmation. JMI's brokerage services are generally performed with no obligation for the customer to choose any of the supply options presented to them.



Exhibit 6 – Resume of Matthew LaFlair, CFO of JMI Consultants, LLC

Matthew C. LaFlair
6447 Rapids Rd, Lockport, NY 14094
315-440-7786
mattlaflair7@gmail.com

Seasoned energy industry professional, committed to exceeding expectations and spearheading innovation. Recognized for building effective processes in order to drive growth, manage the launch of multiple new products and services, and improvement of sales and marketing campaigns in the ultra competitive deregulated energy industry. Skills include; providing strategic direction to business development units, managing vendor relationships, new product launches, strategic selling approaches, and training teams to implement business strategy. Adept at working with cross functional teams: marketing, legal, pricing, customer care, sales support, and IT to launch new marketing campaigns/customer acquisition strategy and surpass growth goals.

EXPERIENCE

NRG Distributed Energy Resources, Buffalo, NY **August 2017 – January 2019**

Leading Demand Response, Energy Advisory, Utility Bill Management, and Distributed Energy provider in North America, serving over 7,000 customers and 3,200 MW's of curtailable load.

Manager of Energy Services

- Manage Advisory Services, Curtailment Solutions, and Distributed Energy Resources Inside, Outside, Technical Sales, and Administrative Teams (54 total staff headcount).
- Increased Demand Response contracted margin from \$24MM in CY 2017 to \$71MM in CY 2018 in six primary markets; PJM, NYISO, ISO-NE, IESO, ERCOT, and CAISO.
- Introduced go-to-market strategy for revolutionary Distributed Energy Resources (DER) product, contracting over 15 MW's of new installations, to date.
- Devised and introduced go-to-market sales strategy for generator retrofit sales program, returning over 250 MW's to Demand Response programs.

NRG Advisory Services/BidURenergy, Inc., Buffalo, NY **January 2010 – August 2017**

Recognized as one of the largest and most advanced energy consulting firms in the industry, NRG Advisory Services/BidURenergy, Inc. focuses on energy management strategies for large industrial and commercial energy users. Company has quickly grown into one of the most recognized brands in the energy industry.

Manager of Energy Services

September 2013 – August 2017

- Supervise 25+ B2B sales employees, administrative support, and research staff.
- Develop brand strategy, focusing on increased sales, customer retention, value-added services, increased margins, enhanced market share within given sectors, and overall company growth.
- Specialize in idea development and implementation by contributing to marketing strategies, including training of staff, in the execution of Direct Mail, Telesales, and Mass Media channels.
- Continually working with internal stakeholders and provide strategic direction on the competitive landscape to drive margins and overall customer satisfaction and retention.
- Research and spearhead communication with new viable vendors to add value to supplier bidding platform and overall services offering.
- Designed complex responses to both private and public RFP's and RFQ's, ensuring company's compliance with all aspects of specific requirements.
- Grew company margin from \$4MM in CY 2014 to \$19.5 MM in CY 2017.

Senior Commodities Analyst

February 2013 – September 2013

- Personally managed all aspects of relationship with strategic/national accounts, including Business Development, Management, and Analytics.
- Developed strategic energy management programs for customers looking to gain visibility into energy procurement, green energy options, and capital-intensive energy management options.
- Collected and reviewed historical data, compiled RFP's to meet each clients individual needs regarding bidding, negotiated contracts to shield clients from avoidable risk.



Exhibit 6 (Cont)– Resume of Matthew LaFlair, CFO of JMI Consultants, LLC

MATTHEW LAFLAIR

315-440-7786 • mattlaflair7@gmail.com

- Participate in quarterly or biannual recap conference calls or meeting to ensure clients have a full understanding of current projects, offerings and bids.
- Conducted RFP process for multiple private and public sector entities ensuring full compliance with all local, state, and federal laws.

Business Development Manager - Commodities

May 2010 - February 2013

- Successfully manage and oversee staff of 15+ Inside Sales employees.
- Devised and implemented sales strategies and campaigns, resulting in revenue increase over 650% in first 18 months.
- Developed indirect sales program, producing 25% share of monthly revenues.
- Compile and organized reports for senior management on employee performance, market share, account/client status, and future revenue projections.

Sales Support Administration

March 2010 - May 2010

- Entry-level position responsible updating and maintaining extensive database of potential and current customers and prospecting for sales leads.
- Utilized various search engines, GIS data, and social media to provide potential leads to Sales Team.

SpeedwayMedia.com, Christiansburg, VA

June 2005 – November 2015

Photo Journalist/Columnist/Reporter for NASCAR Citizens Journal Media Corps accredited website.

- Founder of Matty's Picks column, a weekly column focused on providing fantasy NASCAR insight and statistics. Senior member and featured columnist of SpeedwayMedia team.
- Responsibilities included website updates, news updates, column creation, meeting deadlines, blog updates, and photo journalism.

New York Compensation Managers, Inc., Syracuse, NY

May 2010 - August 2010

Internship for credit towards Bachelor's degree for mid-sized insurance firm in underwriting, marketing, and data analytics departments|

- Compiled and presented extensive research project involving former clients to develop brand strategy and improve customer retention.
- Contributed to execution of comprehensive marketing campaigns for NYCM, USA-TPA, and Xclaim Software.
- Aided in implementation of marketing strategy for new trust fund, introduced in mid-2009.

EDUCATION

B.A., Economics/Business Administration,
West Virginia University, Morgantown, WV

December 2009

- Studied Economics with a minor concentration in Business Administration at the Eberly College of Arts and Sciences
- Member of the West Virginia University Wrestling Team

CERTIFICATIONS

Certified Energy Procurement Professional (CEP Professional®)

October 2013

- The Association of Energy Engineers Certified Energy Procurement Professional (CEP) program is designed to award special recognition to professionals who have demonstrated a high level of knowledge, experience, competence and ethical fitness covering the full spectrum of activities related to the purchase, sale and marketing of electricity and natural gas.



Exhibit 6 – Resume of Jessica Rosenberg, COO of JMI Consultants, LLC

JESSICA ROSENBERG

6562 Royal Pkwy S Lockport, NY 14094 · 832-283-1422

jessica.rosenberg3@outlook.com · <https://www.linkedin.com/in/jessica-rosenberg-650a925a>

Experienced energy consultant highly skilled in the development and implementation of new products, unique and customized energy management solutions, financial modeling, and analytic processes.

EXPERIENCE

FEBRUARY 2019 – PRESENT

COO, JMI CONSULTANTS

Managing partner of energy consulting firm, specializing in large commercial and industrial energy management solutions

SEPTEMBER 2015 – FEBRUARY 2019

MANAGER OF ADVISORY SERVICES, NRG ENERGY

Manage a team of analysts responsible for providing large commercial and industrial customers with customized energy solutions; New product development and implementation; Develop and maintain relationships with high profile and national clients

FEBRUARY 2013 – SEPTEMBER 2015

SENIOR COMMODITIES ANALYST, NRG ENERGY

Providing advisory services to large industrial and commercial customers; Supplying clients with optimal and innovative solutions to their energy needs; Utilizing versatile background in energy to come up with these creative solutions by viewing client utility and energy needs as a whole, rather than separate matters; Maintaining/fostering relationships with third party suppliers in regards to brokerage; Helping to develop intelligent resources that give customers insight to their energy usage and current market condition

EDUCATION

MAY 2013

B.A. ECONOMICS & PSYCHOLOGY, UNIVERSITY AT BUFFALO

Accounting, Econometrics, Economics of Money & Banking, Economics of Regulation, Industrial Organization, international Economics, Macroeconomic Theory, Microeconomic Theory, Social Psychology

SKILLS & CERTIFICATIONS

- CEP, Certified Energy Procurement Professional
- Financial Modeling
- Analysis
- Microsoft Office products; i.e. Excel, VBA
- Customer Service
- Project Management



Exhibit 7 – Proof of Publication

Following Exhibit 7 are the required Proofs of Publication from the following publications:

Philadelphia Daily News – Exhibit 7(A)

Johnstown Tribune-Democrat – Exhibit 7(B)

Erie Times News – Exhibit 7(C)

Williamsport Sun-Gazette – Exhibit 7(D)

Harrisburg Patriot News – Exhibit 7(E)

Scranton Times-Tribune – Exhibit 7(F)

Pittsburgh Post-Gazette – Exhibit 7(G)

Exhibit 7(A) – Proof of Publication, Philadelphia Daily News

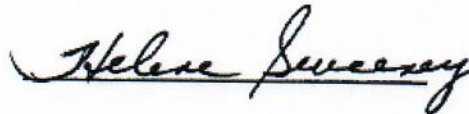
**Proof of Publication in The Philadelphia Daily News
Under Act. No 587, Approved May 16, 1929**

STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Helene Sweeney being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said newspaper on the following dates:

March 4, 2019

Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

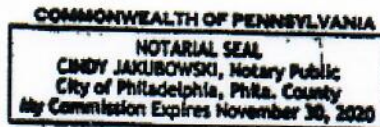


Sworn to and subscribed before me this 4th day of
March, 2019.



Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE
Applications of JMI Consultants, LLC ("JMI") For Approval To Offer, Render, or Furnish Service as a Marketer/Broker Engaged in The Business Of Natural Gas and Electricity Supply Services, To The Public in The Commonwealth Of Pennsylvania.
JMI will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. JMI will also be filing an application with the PUC for a license to provide electric generation services as a broker/marketer engaged in the business of providing electricity supply services. JMI proposes to provide natural gas services within Columbia Gas, National Fuel Gas, PECO, Peoples, PGW, UGI, and Valley Energy. JMI proposes to provide electric supply services within Citizens' Electric, Duquesne Light, Met-Ed, PECO, Pensacola, Penn Power, Pike, PPL, UGI, Watsboro, and West Penn under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.
The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of JMI Consultants, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3266, Harrisburg, PA 17105-3266. You should send copies of any protest to JMI at the address listed below.
JMI Consultants, LLC
2800 White Drive, Suite 9
Williamsville, NY 14221
716-428-3501

Exhibit 7(B) – Proof of Publication, Johnstown Tribune-Democrat

COMMONWEALTH OF PENNSYLVANIA }
County of Cambria } **SS**

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

Applications of JMI Consultants, LLC ("JMI") For Approval To Offer, Render, or Furnish Services as a Marketer/Broker Engaged in The Business Of Natural Gas and Electricity Supply Services, To The Public in The Commonwealth Of Pennsylvania.

JMI will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. JMI will also be filing an application with the PUC for a license to provide electric generation services as a broker/marketer engaged in the business of providing electricity supply services. JMI proposes to provide natural gas services within Columbia Gas, National Fuel Gas, PECO, Peoples, PGW, UGI, and Valley Energy. JMI proposes to provide electric supply services within Citizens' Electric, Duquesne Light, Met-Ed, PECO, Penalec, Penn Power, Pike, PPL, UGI, Wallsboro, and West Penn under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of JMI Consultants, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to JMI at the address listed below.

JMI Consultants, LLC
2809 Wehrle Drive, Suite 9
Williamsport, NY 14221
716-428-3501

pu
th
of
in
of

On this 4th day of March A.D. 2019, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Christine Marhefka, who being duly sworn according to law, deposes and says as Sales Manager / Major Accounts of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,

County of Cambria, and Commonwealth of Pennsylvania and above matter published in said publication in the regular issues n, PA, on March 2, 2019; and that the Affiant is not interested g and that all of the allegations as to time, place and character

Christine Marhefka

STATEMENT OF ADVERTISING COSTS

Signed and sworn to before me on
4th day of March, 2019,
by Christine Marhefka making the statement.

Vivian Ohs

0.00 Lines @ \$2.50 per line	0.00
7 Inches @ \$25.00 per inch	175.00
Notary Fee	5.00
Clerical Fee	2.50
Total Cost	182.50

Commonwealth of Pennsylvania - Notary Seal
Vivian Ohs, Notary Public
Cambria County
My commission expires December 6, 2020
Commission number 1123017
Member, Pennsylvania Association of Notaries

To The Tribune-Democrat, Johnstown, PA
For publishing the notice or publication
attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

_____ for publisher of _____
a newspaper of general circulation, hereby acknowledges receipt of the aforesaid
and publication costs and certifies that the same has been duly paid.

(Name of Newspaper)

By _____

Exhibit 7(C) – Proof of Publication, Erie Times News

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

JMI Consultants
2809 Wehrle Dr Suite 9
Williamsville NY 14221

REFERENCE: 97897 353562
PUC Notice

STATE OF PENNSYLVANIA)
COUNTY OF ERIE) SS:

Jennifer L. Trott, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, a true and correct copy of which is attached, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 03/03/19

TOTAL COST: \$677.00 AD SPACE: 0 Lines

FILED ON: 03/03/19

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

Applications of JMI Consultants, LLC ("JMI") For Approval To Offer, Render, or Furnish Services as a Marketer/Broker Engaged In The Business Of Natural Gas and Electricity Supply Services, To The Public In The Commonwealth Of Pennsylvania.

JMI will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. JMI will also be filing an application with the PUC for a license to provide electric generation services as a broker/marketer engaged in the business of providing electricity supply services. JMI proposes to provide natural gas services within Columbia Gas, National Fuel Gas, PECO, Peoples, PGW, UGI, and Valley Energy. JMI proposes to provide electric supply services within Citizens Electric, Duquesne Light, Met-Ed, PECO, Penelec, Penn Power, Pike, PPL, UGI, Wellsboro, and West Penn under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of JMI Consultants, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to JMI at the address listed below.

JMI Consultants, LLC
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
716-428-3501

Sworn to and subscribed before me this 4th day of March 2019

Affiant: Jennifer L. Trott

NOTARY: Ann K. Wilson

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Ann K. Wilson, Notary Public
City of Erie, Erie County
My Commission Expires March 16, 2019
NEW YORK PENNSYLVANIA ASSOCIATION OF NOTARIES

Exhibit 7(D) – Proof of Publication, Williamsport Sun-Gazette

**PROOF OF PUBLICATION OF NOTICE IN THE WILLIAMSPORT
SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929**

STATE OF PENNSYLVANIA

COUNTY OF LYCOMING

SS:

Robert O. Rolley, Jr., Publisher of the Sun-Gazette LLC publishers of the Williamsport Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport Sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

March 4, 2019

Affiant further deposes that he is an officer duly authorized by the Sun-Gazette LLC, publisher of the Williamsport Sun-Gazette, to verify the foregoing statement under oath and declare that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all the allegations in the foregoing statement as to time, place and character of publication are true.

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Applications of JMI Consultants, LLC ("JMI") For Approval To Offer, Render, or Furnish Services as a Marketer / Broker Engaged in The Business Of Natural Gas and Electricity Supply Services To The Public in The Commonwealth Of Pennsylvania

JMI will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. JMI will also be filing an application with the PUC for a license to provide electric generation services as a broker/marketer engaged in the business of providing electricity supply services. JMI proposes to provide natural gas services within Columbia Gas, National Fuel Gas, PECC, Peoples, PGW, UGI, and Valley Energy. JMI proposes to provide electric supply services

within Citizens' Electric, Duquesne Light, Met-Ed, PECC, Penelec, Penn Power, Pike, PPL, UGI, Wellbora, and West Penn under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of JMI Consultants, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3065, Harrisburg, PA 17105-3265. You should send copies of any protest to JMI at the address listed below.

JMI Consultants, LLC
2809 Wehrle Drive,
Suite 9
Williamsport, NY 14221
716-426-3601

SUN-GAZETTE LLC

Sworn to and subscribed before me

The 4th day of March 2019

BETH A. MILLER
COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
BETH A MILLER
Notary Public
CITY OF WILLIAMSPORT, LYCOMING COUNTY
My Commission Expires Apr 18, 2020

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr :

For publishing the notice attached

Hereto on the above state dates.....\$ 279.36

Probated same.....\$

Total.....\$ 279.36

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE SUN-GAZETTE LLC hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid

SUN-GAZETTE LLC
BY Robert O. Rolley, Jr.

Exhibit 7(E) – Proof of Publication, Harrisburg Patriot News



The Patriot News
LEGAL AFFIDAVIT

AD# 0009048596

Commonwealth of Pennsylvania,) ss
County of Cumberland)

Victoria Soto being duly sworn, deposes that he/she is principal clerk of PA Media Group, that The Patriot News is a public newspaper published in the city of Mechanicsburg, with general circulation in Cumberland and Dauphin and surrounding counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Patriot News 03/05/2019

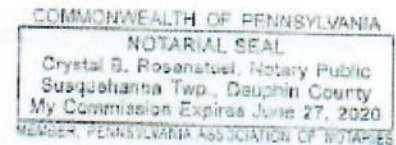
Victoria Soto

Principal Clerk of the Publisher

Sworn to and subscribed before me this 6th day of March 2019

Crystal B. Rosenstiel

Notary Public



**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

Applications of JMI Consultants, LLC ("JMI") For Approval To Offer, Render, or Furnish Services as a Marketer/Broker Engaged in The Business Of Natural Gas and Electricity Supply Services, To The Public in The Commonwealth Of Pennsylvania.

JMI will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. JMI will also be filing an application with the PUC for a license to provide electric generation services as a broker/marketer engaged in the business of providing electricity supply services. JMI proposes to provide natural gas services within Columbia Gas, National Fuel Gas, PECO, Peoples, PGW, UGI, and Valley Energy. JMI proposes to provide electric supply services within Citizens' Electric, Duquesne Light, Met-Ed, PECO, Penelec, Penn Power, Pike, PPL, UGI, Wellsboro, and West Penn under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of JMI Consultants, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to JMI at the address listed below.

JMI Consultants, LLC
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
716-428-3501



Exhibit 7(F) – Proof of Publication, Scranton Times--Tribune

The Scranton Times (Under act P.L. 877 No 160. July 9, 1976)
Commonwealth of Pennsylvania, County of Lackawanna

JMI CONSULTANTS
MATTHEW LAFLAIR
2809 WERHLE DR., STE 9 WILLIAMSVILLE NY 14221
14221

Account # 632900
Order # 82312917
Ad Price: 273.90

LEGAL NOTICE PENNSYLVANIA

Ann Marie Fortese

Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

03/02/2019

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true *Ann Marie Fortese*

Sworn and subscribed to before me
this 4th day of March A.D., 2019

Sharon Venturi
(Notary Public)

Commonwealth of Pennsylvania - Notary Seal
Sharon Venturi, Notary Public
Lackawanna County
My commission expires February 12, 2022
Commission number 1254228
Member, Pennsylvania Association of Notaries

LEGAL NOTICE

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
Applications of JMI Consultants, LLC ("JMI") For Approval To Offer, Render, or Furnish Services as a Marketer/Broker Engaged in The Business Of Natural Gas and Electricity Supply Services To The Public In The Commonwealth Of Pennsylvania.

JMI will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. JMI will also be filing an application with the PUC for a license to provide electric generation services as a broker/marketer engaged in the business of providing electricity supply services. JMI proposes to provide natural gas services within Columbia Gas, National Fuel Gas, PECCO, Peoples, PGW, UGI, and Valley Energy. JMI proposes to provide electric supply services within Citizens Electric, Duquesne Light, Met-Ed, PECCO, Penelec, Penn Power, Pike, PPL, UGI, Wellsboro, and West Penn under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of JMI Consultants, LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to JMI at the address listed below.

JMI Consultants, LLC
2809 Werhle Drive, Suite 9
Williamsville, NY 14221
716-428-3501

Exhibit 7(G) – Proof of Publication, Pittsburgh Post-Gazette

No. _____ Term, _____


Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss K. Flaherty, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the _____ regular _____ editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

06 of March, 2019

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.


PG Publishing Company

Sworn to and subscribed before me this day of
March 06, 2019



Commonwealth of Pennsylvania - Notary Seal
Elizabeth R. Chmura, Notary Public
Allegheny County
My commission expires February 8, 2022
Commission number 1326781
Member, Pennsylvania Association of Notaries

STATEMENT OF ADVERTISING COSTS
JMI Consultants
2809 Werhle Dr, Suite 9
Williamsville New York 14221

To PG Publishing Company

Total ----- \$465.00

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office
2201 Sweeney Drive
CLINTON, PA 15026
Phone 412-263-1338

PG Publishing Company, a Corporation, Publisher of
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By 

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

Attorney For

COPY OF NOTICE OR PUBLICATION

PENNSYLVANIA
PUBLIC UTILITY
COMMISSION NOTICE

Applications of JMI Consultants, LLC ("JMI") for Approval to Offer, Render or Furnish Services as a Marketer/Broker Engaged in the Business of Natural Gas and Electricity Supply Services to the Public in the Commonwealth of Pennsylvania

JMI will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/market engaged in the business of providing natural gas services. JMI will also be filing an application with the PUC for a license to provide electric generation services as a broker/market engaged in the business of providing electricity supply services. JMI proposes to provide natural gas services within Columbia Gas, National Fuel Gas, PECO, Peoples Power, UGI and Valley Energy. JMI proposes to provide electric supply services within Citizens Electric, Duquesne Light, MetEd, PECO, Penelec, Penn Power, Phe, PPL, UGI, Wellston, and West Penn under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider the application without a hearing. Protests directed to the technical or financial fitness of JMI Consultants, LLC may be filed with the PUC, PO Box 3200, Harrisburg, PA 17105-3200. You should send copies of any protest to JMI at the address listed below.

JMI Consultants, LLC
2809 Werhle Drive, Suite 9
Williamsville, NY 14221
716-428-3511

Appendix A

APPLICATION AFFIDAVIT

State of New York:

County of Erie:

Matthew LaFlair, Affiant, being duly sworn according to law, deposes and says that:

He is the Chief Financial Officer of JMI Consultants, LLC;

That he is authorized to and does make this affidavit for said Applicant;

That the Applicant herein JMI Consultants, LLC has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as an electric generation supplier pursuant to 66 Pa. C.S. § 2809 (B).

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

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

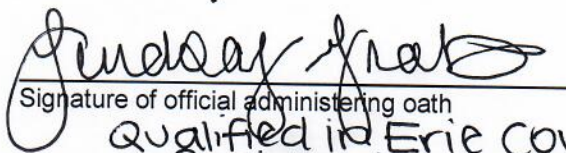
That the Applicant herein JMI Consultants, LLC acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

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.



Signature of Affiant

Sworn and subscribed before me this 14th day of March, 2019.



Signature of official administering oath

qualified in Erie County

Registration # 01GR6306874

My commission expires June 30, 2019.

Appendix B

OPERATIONS AFFIDAVIT

State of New York:

County of Erie

Matthew LaFlair, Affiant, being duly sworn according to law, deposes and says that:

He is the Chief Financial Officer of JMI Consultants, LLC;

That he is authorized to and does make this affidavit for said Applicant;

That JMI Consultants, LLC, the Applicant herein, acknowledges that JMI Consultants, LLC 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 JMI Consultants, LLC, the Applicant herein, asserts that 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 JMI Consultants, 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).

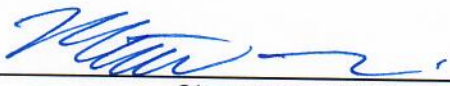
As provided by 66 Pa. C.S. §2810 (C)(6)(iv), Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That JMI Consultants, 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 52 PA. Code Chapter 56.

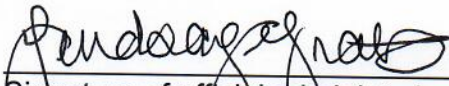
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Bureau of Public Liaison or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the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

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



Signature of Affiant

Sworn and subscribed before me this 14th day of March, 2019.



Signature of official administering oath
Qualified in Erie County
Registration # 016-R6306874

My commission expires June 30, 2021.