

June 7, 2019

Pennsylvania Public Utility Commission
Secretary
400 North Street
Harrisburg, PA 17128

Re: **KOBIONA LLC- Docket No A-2019-3009977**
Application Form for Parties Wishing to Offer, Render, Furnish, or Supply
Electricity or Electric Generation Services to the Public in the Commonwealth of
Pennsylvania

To Whom It May Concern:

Enclosed please find the documents listed below, being submitted on behalf of our client,
KOBIONA LLC:

1. NH License Renewal Letter
2. MA License Renewal Letter
3. ME License
4. OH License
5. Updated section 4.e
6. Attestation
7. Explanation of its Ethical Procedures.

If there is any issue, or if you require any further information, please do not hesitate to contact us.

Thank you,

LicenseLogix
140 Grand Street, Suite 300
White Plains, NY 10601
service@licenselogix.com
(800) 292-0909


X

Authorized Representative

Statement as per 52 PA Code § 1.36

I, Justin Vissat, 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 provide 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).



Justin Vissat
Managing Partner
KOBIONA LLC

5-30-2019

Date



MY COMMISSION EXPIRES MAY 31, 2024



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

May 22, 2019

Docket No. A-2019-3009977

Utility Code: 1122220

CERTIFIED

JUSTIN VISSAT
KOBIONA LLC
67 WEST MAIN ST STE 412
CLINTON CT 06413

RE: Electric Generation Supplier License Application

Dear Mr. Vissat:

On May 17, 2019, the Public Utility Commission accepted Kobiona LLC's application for an Electric Generation Supplier license. The application was incomplete. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached question(s).

Please be advised that you are directed to forward the requested information to the Commission within **30** days from the date of this letter. Failure to respond may result in the application being denied. As well, if Kobiona LLC has decided to withdraw its application, please reply notifying the Commission of such a decision.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

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

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, _____, 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

Docket No. A-2019-3009977
Kobiona LLC
Data Requests

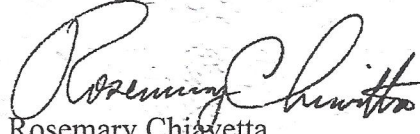
1. Reference Application, Section 4.e, Customers – Applicant incorrectly selected both Small Commercial and All of the Above. Please file an updated Application page that clarifies which customers the Applicant wishes to serve.
2. Reference Application, Section 8.a, Technical Fitness – Applicant failed to provide a license for Massachusetts, New Hampshire, Ohio, and Maine. Please provide the missing documentation.
3. Reference Application, Section 8.b, c, d, Technical Fitness – Applicant failed to provide an Explanation of its Ethical Procedures. Please provide an updated application page with the appropriate corrections.

statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite completion of the application, please also e-mail the information to Stephen Jakab at sjakab@pa.gov. Please direct any questions to Stephen Jakab, Bureau of Technical Utility Services, at sjakab@pa.gov (preferred) or (717) 783-6174.

Sincerely,

A handwritten signature in cursive script that reads "Rosemary Chiavetta". The signature is written in black ink and is positioned above the printed name and title.

Rosemary Chiavetta
Secretary

Enclosure



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

October 23, 2018

Justin Vissat, Managing Partner
Strategic Energy Partners, LLC d/b/a Kobiona, LLC
67 West Main Street, Suite 412
Clinton, CT 06413

Dear Mr. Vissat,

The Department of Public Utilities has reviewed Strategic Energy Partners, LLC d/b/a Kobiona, LLC's ("Company") application for renewal of its **Electricity Broker License, EB-373**, and is pleased to inform you that the Company's application for renewal has been approved.

As a condition of maintaining this license, the Company must file updated information within 30 days of any material or organic change in the information required by 220 CMR 11.05(2), and must comply with all relevant requirements of G.L. c. 164, and the regulations promulgated thereunder, including 220 CMR 11.00, 12.00. If the Company decides to request renewal of its license next year, please submit the renewal application no later than **July 1, 2019**. The renewal application is available at: <https://www.mass.gov/information-for-competitive-suppliers-and-electricity-brokers>.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Marini".

Mark D. Marini
Secretary

THE STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION

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

CHAIRMAN
Martin P. Honigberg

COMMISSIONERS
Kathryn M. Bailey
Michael S. Giaimo

EXECUTIVE DIRECTOR
Debra A. Howland

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

Tel. (603) 271-2431

FAX (603) 271-3878

Website:
www.puc.nh.gov

April 23, 2018

Justin Vissat, Managing Partner
Kobiona LLC
67 West Main St., Suite 413
Clinton, CT 06413

Re: DM 18-063 Kobiona LLC
Application to Renew Registration as a Provider of Electric Aggregation Service

Dear Mr. Vissat:

On April 16, 2018, Kobiona LLC (Kobiona) submitted an application with the Commission to renew its registration as a provider of electric aggregation service. Staff reviewed the application and determined that it is complete.

Commission Staff filed a memorandum on April 23, 2018 recommending that a waiver be granted of the renewal filing deadline under N.H. Code Admin. Rules Puc 2003.06(a), and that Kobiona's registration renewal application be approved for a two-year term, beginning on June 2, 2018, pursuant to Puc 2003.06(e)(1).

The rule waiver has been granted, and Kobiona's application for registration renewal is approved, effective as of June 2, 2018, under Puc 2003.06(e)(1). The renewed registration is for a term of two years and expires at the close of business on June 2, 2020. Pursuant to Puc 2003.06(a), you must submit your next renewal application at least 60 days prior to the expiration of the approved registration term, on or before April 3, 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 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

The Public Utilities Commission of Ohio
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate

Issued pursuant to Case Number(s):
18-1620-GA-AGG

is
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:
18-682G(1)

Granted to:
Kobiona LLC

Whose office or principal place of business is located at:
67 West Main Street, Suite 412, Clinton, CT 06413

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

Certification Effective:
November 29, 2018 through November 29, 2020

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

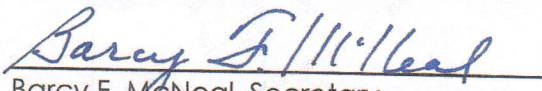
This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

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

Witness the seal of the Commission affixed at Columbus, Ohio

Dated: **December 10, 2018**

By Order of
The Public Utilities Commission of Ohio


Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Susan Patterson, Acting Secretary
Beverly Hoskinson, Acting Secretary



**Public Utilities
Commission**

Asim Z. Haque, Chairman

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

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

Certificate Number:

18-1348E (1)

Issued Pursuant to Case Number(s):

18-1621-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to, **Kobiona, LLC** whose office or principal place of business is located at **67 West Main Street, Suite 412, Clinton, CT 06413** to provide **power broker** services within the State of Ohio **effective November 29, 2018**.

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.

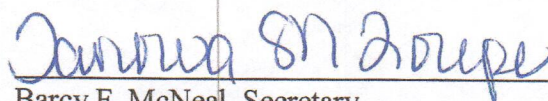
Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

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

Dated: **December 3, 2018**

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO



Barcy F. McNeal, Secretary

Tanowa M. Troupe, Acting Secretary

Susan Patterson, Acting Secretary

Beverly Hoskinson, Acting Secretary

Certificate Expires: **November 29, 2020**

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 2016-00104

July 12, 2016

Strategic Energy Partners LLC
Application for License to Operate
As A Competitive Electricity Provider

ORDER GRANTING LICENSE

VANNOY, Chairman; MCLEAN and WILLIAMSON, Commissioners

I. SUMMARY

Through this Order, Strategic Energy Partners LLC (SEP) is issued a license to operate as a competitive electricity provider furnishing aggregator/broker services to the non-residential customer classes throughout Maine's service territories pursuant to Chapter 305 of the Commission's Rules.

II. APPLICATION AND DECISION

On May 25, 2016, SEP applied to the Commission to operate in Maine as a competitive electricity provider pursuant to Chapter 305. SEP proposes to provide aggregator/broker services to the non-residential customer classes throughout Maine's service territories and has met all the Chapter 305 filing requirements.

As a licensed competitive electricity provider, SEP 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 competitive electricity provider 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 competitive electricity provider for violations of the provisions of this section by representatives or agents acting on the competitive electricity provider's behalf. Chapter 305 § 2(C)(3) also requires a competitive electricity provider to use reasonable efforts to avoid conducting business with any entity acting as a competitive electricity provider in Maine without a license from the Commission. Therefore, if SEP 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 competitive electricity providers. On September 12, 2009, in Docket No. 2009-260, statutory changes took effect that changed the title of this position. P.L. 2009, ch. 122. The Director of Technical Analysis is now the Director of Electric and Gas Utility Industries. All existing delegation orders that delegate Commission authority to the

Director of Technical Analysis will now read that we delegate our authority to the Director of Electric and Gas Utility Industries.

Accordingly, it is

O R D E R E D

1. That Strategic Energy Partners LLC is hereby issued a license to operate as a competitive electricity provider pursuant to Chapter 305 of the Commission's Rules, to provide aggregator/broker services to the non-residential customer classes throughout Maine's service territories pursuant to Chapter 305 of the Commission's Rules; and
2. 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 12th day of July, 2016.

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.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

Executive.Director@puc.nh.gov
amanda.noonan@puc.nh.gov
bryan.connelly@puc.nh.gov
david.goyette@puc.nh.gov
david.wiesner@puc.nh.gov
jvissat@kobiona.com
leszek.stachow@puc.nh.gov
ocalitigation@oca.nh.gov
tom.frantz@puc.nh.gov

Docket #: 18-063-1 Printed: April 23, 2018

FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with: DEBRA A HOWLAND
EXEC DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.

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

KOBIONA LLC provides competitive supplier bids to customers and assists them with the process of contracting directly with their chosen supplier. We also provide ongoing energy management consulting throughout their engagement with KOBIONA.

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:

- Residential Customers
- Small Commercial Customers - (25 kW and Under)
- Residential and Small Commercial as Mixed Meter **ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)**
- Large Commercial Customers - (Over 25 kW)
- Industrial Customers
- Governmental Customers
- All of above (Except Mixed Meter)
- Other (Describe):

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

Upon licensure.

KOBIONA Ethical Produces:

This Code of Ethics sets forth legal and ethical standards for directors, officers and employees of KOBIONA. This Code is intended to deter wrongdoing and to promote the ethical conduct of all Company business.

Compliance with Laws, Rules and Regulations

KOBIONA requires that all employees, officers and directors comply with all laws, rules and regulations applicable to the business. You are expected to use sound judgment and common sense to comply with all applicable laws, rules and regulations.

If you become aware of the violation of any law, rule or regulation by the Company, whether by its officers, employees, directors, or any third-party doing business on behalf of the Company, it is your responsibility to promptly report the matter to your supervisor.

Conflicts of Interest

Employees, officers and directors must act in the best interests of the Company. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest." It is your responsibility to disclose any transaction or relationship that reasonably could be expected to give rise to a conflict of interest.

Confidentiality

Employees, officers and directors must maintain the confidentiality of confidential information entrusted to them in their capacity with [Company name]. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities.

Honest and Ethical Conduct and Fair Dealing

Employees, officers and directors should deal honestly, ethically and fairly with the [Company name]'s suppliers, customers, competitors and employees. Statements regarding the Company's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Protection and Proper Use of Corporate Opportunities

Employees, officers and directors must advance the Company's legitimate interests when the opportunity to do so arises. You must not take for yourself personal opportunities that are discovered through your position with the Company or the use of property or information of the Company.

Accuracy of Books and Records and Public Reports

Employees, officers and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

Reporting and Compliance Procedures

Every employee, officer and director has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Code. Any employee, officer or director who knows or believes that any other employee or representative of the Company has engaged or is engaging in Company-related conduct that violates applicable law or this Code should report such information to his or her supervisor or to the General Counsel. Such reports should be made without any fear of retaliation. The Company will not discipline, discriminate against or retaliate against any employee who reports such conduct, unless it is found that the report was made with knowledge that it was false, or who cooperates in any investigation or inquiry regarding such conduct.