# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION 

Application of National Auditing Services \& Consulting LLC , d/b/a $\qquad$ National Energy Discounters 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 $\mathrm{d} / \mathrm{b} / \mathrm{a}$ ), primary address, web address, and telephone number of Applicant:

National Auditing Services \& Consulting LLC
National Energy Discounters
500 Purdy Hill Rd., Ste 4 Monroe, CT 06851
www.nascaudits.com
203-854-8555
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.
Paracorp Incorporated
600 North Second St
Harrisburg PA 17101
888-272-3725
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.

Carmine Nuzzi - President/Managing Member
cnuzzi@nascaudits.com
203-854-8503
844-727-9813
fax
500 Purdy Hill Rd., Ste 4
Monroe CT 06468
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.

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\begin{aligned}
& \text { is not using an attomey, explicitly state so. USED } \\
& \text { ONE IS NOT BE,NNG }
\end{aligned}
$$

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.

Carmine Nuzzi
Presient/Managing Member
500 Purdy Hill Rd, Ste 4
Monroe CT 06468
cnuzzi@nascaudits.com
203-854-8503
FAX: 844-727-9813

Mario Gentile
Director of Customer Relations
500 Purdy Hill Rd, Ste 4
Monroe CT 06468
mgentile@nascaudits.com
203-854-8503 ext 1002
FAX: 844-727-9813

## 2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. FICTITIOUS NAME: (Select appropriate statement and provide supporting documentation as listed.)
x 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. See Exhibit A

## 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.)
$\square$ The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa . C.S. $\S 4124$ relating to Department of State filing requirements.
or
$\square$ The Applicant is a:
$\square$ domestic general partnership (*)
$\square$ domestic limited partnership (15 Pa. C.S. §8511)
foreign general or limited partnership (15 Pa. C.S. §4124)
domestic limited liability partnership ( $15 \mathrm{~Pa} . \mathrm{C} . \mathrm{S} . \S 8201$ )
foreign limited liability general partnership ( 15 Pa . C.S. §8211)
foreign limited liability limited partnership ( $15 \mathrm{~Pa} . \mathrm{C} . \mathrm{S} . \S 8211$ )
- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, $\mathrm{d} / \mathrm{b} / \mathrm{a}$, 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. $\S 4124$.

【 The Applicant is a:
$\square$ domestic corporation (15 Pa. C.S. §1308)
$\square$ foreign corporation (15 Pa. C.S. §4124)
domestic limited liability company (15 Pa. C.S. §8913)
区 foreign limited liability company ( 15 Pa . C.S. §8981)
Other (Describe):

## See Exhibit A

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
- Give name and address of officers.


## 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.
$\square$ The Applicant is presently doing business in Pennsylvania as amunicipal electric corporation

$\square$
electric cooperative
$\square$
$\square$
$\square$
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

ख The Applicant is not presently doing business in Pennsylvania.
b. APPLICANT'S PROPOSED OPERATIONS: The Applicant proposes to operate as a (may check multiple):
$\square$ Generator of electricity
$\square$ Supplier of electricity
Aggregator engaged in the business of supplying electricity
X Broker/Marketer engaged in the business of supplying electricity services
x] Check here to verify that your organization will not be taking title to the electricity nor will you be making payments for customers.
$\square$ Electric Cooperative and supplier of electric power
$\square$ Other (Describe):
c. PROPOSED SERVICES: Describe in detail the electric services or the electric generation services which the Applicant proposes to offer.

Procurement management/Brokership
d. PROPOSED SERVICE AREA: Check the box of each Electric Distribution Company for which the Applicant proposes to provide service.

Citizens' Electric<br>Duquesne Light<br>Met-Ed<br>- PECO<br>$\square$ Penelec<br>- Penn Power

e. CUSTOMERS: Applicant proposes to provide services to:
-1 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)
x. Industrial Customers
$\square$ Governmental Customers
$\square \quad$ All of above (Except Mixed Meter)
$\square$ Other (Describe):
f. START DATE: Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

Upon licensure

## 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. NO NE are not currently a defendant in criminal or civil
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.

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$$

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

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/affiliate/predecessor/ person identified have not had any formal or escalated actions or complaints in Commonwealth of PA or any state filed with or by a customer, regulatory agency, prosecutory agency within prior 5 years.
d. SUMMARY: If applicable; provide a statement as to the resolution or present status of any actions listed above.

## 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)
See Exhibit B
a. STATUTORY AGENCIES: Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa . Code $\S 5.14$, 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 Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120
Office of the Attorney General Bureau of Consumer Protection Strawberry Square, 14th Floor 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 $\S \S 1.57$ 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 $\S 5.14$. Contact information for each EDC is as follows.

## West Penn:

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

## Duquesne Light:

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

Pike County Light \& Power Company:
Vice President - Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830
PECO:
Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

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:<br>Legal Department<br>First Energy<br>2800 Pottsville Pike<br>Reading PA, 19612

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

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

## 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 $\$ 250,000$.

区 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.

See Exhibit C

## 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:

- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.
- Published Applicant or parent company financial and credit information (i.e. 10 Q or 10 K ). (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.
- Audited financial statements exhibiting accounts over a minimum two year period.
- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

See Exhibit D
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.
N/A applicant is acting as a Broker/Marketer only
d. BROKER PAYMENT STRUCTURE: If applicant is a broker/marketer, explain how your organization will be collecting your fees.
Applicant will be collecting fees from the energy supplier.
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.

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Carmine Nuzzi
President/Managing Member
500 Purdy Hill Rd., Ste 4 Monroe CT 06468
cnuzzi@nascaudits.com
203-854-8503
844-727-9813
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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.


## See Exhibit F

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

X 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
$\square$ Other (Describe):
c. DOOR TO DOOR SALES: Will the Applicant be implementing door to door sales activities?

## $\square \quad$ Yes

If yes, will the Applicant be using verification procedures?
$\square \begin{aligned} & \text { Yes } \\ & \mathrm{No}\end{aligned}$
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.

Three (3) levels of verification process will be carried out.
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.
Carmine Nuzzi- President/Managing Member
See Exhibit G for resumes
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 $\qquad$ .

【 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）．
$\square$ AGREED－Applicant will provide compliance with this requirement within 120 days of receiving its license

区 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 $\S 54.43$ ，as well as any future amendments．

## 区 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 $\S \S 54.201$－－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 $\S 54.39$（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．

## 凶 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．

## 凶 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．$\S \S 4903$ and 4904 ，relating to perjury and falsification in official matters．

## 区 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．

## 凶 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．

## 区 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．

## 区 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．

## 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.

## See Exhibit H

## 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 <br> Times- <br> News | Harrisburg <br> Patriot- <br> News | Philadelphia Daily News | Pittsburgh <br> Post- <br> Gazette | Scranton <br> Times- <br> Tribune | Williamsport Sun-Gazette | Johnstown <br> Tribune- <br> 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 | x | X | X | X | X | X | X |

(Example Publications are provided at Appendices $K$ and $L$ )

## 13. SIGNATURE

Applicant::


By: Carmine Nuzzi
Title: President/Managing Member

## 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:
National Auditing Services \& Consulting LLC dba National Energy Discounters
$\qquad$


## Exhibit A

## Business information

| Corporations - Search Business Entities (corpsearch.aspx) $\quad$ Search UCC Transactions (uccsearch.aspx) Forms v |  |
| :--- | :--- |
| Contact Corporations (http://muw.dos.pa.gov/BusinessCharities/Pages/default.aspx) | Login (../Account/ValidateUser) |
|  | Register (../Account/Register_account) |

Search entity / Select entity / Order documents

## Order Business Documents

## Business Name History

| Name |  | Name Type |
| :---: | :---: | :---: |
| National Energy Discounters |  | Current Name |
|  | usiness Entity Details Officers |  |
| Name | National Energy Discounters |  |
| Entity Number | 6897967 |  |
| Entity Type | Fictitious Names |  |
| Status | Active |  |
| Citizenship | Domestic |  |
| Entity Creation Date | 05/31/2019 |  |
| Effective Date | 05/31/2019 |  |
| State Of Inc | PA |  |
| Address | 600 North Second Street HAR | BURG PA 17101 Dauphin |
| Name | NATIONAL AUDTING SERVICE | \& CONSULTING LLC |
| Title | OWNER |  |
| Address | 500 PURDY HILL RD STE 4 M | ROE CT 06468 |

## Filed Documents

The information presented below is for your reference. To place an order you will need to log in. If you do not have a PENN File account, you may register for an account by clicking here (/Account/Register_account).

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Filter Records

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Corporations - Search Business Entities (corpsearch.aspx) Search UCC Transactions (uccsearch.aspx) Forms v

Contact Corporations (http://www.dos.pa.gov/BusinessCharities/Pages/default.aspx)
Login (../Account/ValidateUser)

Register (../Account/Register_account)

Search entity / Select entity / Order documents

## Order Business Documents

## Business Name History

| Name |  | Name Type |
| :--- | :--- | :--- |
| National Auditing Services \& Consulting LLC |  | Current Name |
|  | Business Entity Details <br> Officers |  |
| Name | National Auditing Services \& Consulting LLC |  |
| Entity Number | 6788031 |  |
| Entity Type | Limited Liability Company |  |
| Status | Active |  |
| Citizenship | Foreign |  |
| Entity Creation Date | $10 / 23 / 2018$ |  |
| Effective Date | $10 / 23 / 2018$ | CT |
| State Of Inc | \%PARACORP |  |
| Address |  |  |

## Filed Documents

The information presented below is for your reference. To place an order you will need to log in. If you do not have a PENN File account, you may register for an account by clicking here (/Account/Register_account).

Show 25 entries

| Select | Date | Document | Pages | Plain Copy Quantity\# | Price | Certified Copy Quantity\# | Certified Copy Price | Microfilm \# | Microfilm Start | Microfilm End | Line <br> Total |
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| $\square$ | 10/23/2018 | Foreign Registration Statement 1 | 2 | 1 | \$3.00 | 0 | \$40.00 |  |  |  |  |

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE <br> 10/23/2019 

## TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

## I DO HEREBY CERTIFY THAT,

## National Auditing Services \& Consulting LLC

is duly registered to do business under the laws of the Commonwealth of Pennsylvania and remains a registered Foreign Limited Liability Company so far as the records of this office show, as of the date herein.

I DO FURTHER CERTIFY THAT this Certificate of Registration shall not imply that all fees, taxes and penalties owed to the Commonwealth of Pennsylvania are paid.


IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the Seal of the Secretary's Office to be affixed, the day and year above written


Acting Secretary of the Commonwealth

Verify this certificate online at http://www.corporations.pa.gov/orders/verify

## ARTICLES OF ORGANIZATION <br> DOMESTIC LIMITED LIABILITY COMPANY

MAILING ADDRESS:
Commercial Recording Division
Connecticut Secretary of the State
P.O. Box 150470

Hartford, CT 06115-0470
860-509-6003

DELIVERY ADDRESS:
Commercial Recording Division
Connecticut Secretary of the State
30 Trinity Street
Hartford, CT 06106
860-509-6003

Please contact the Department of Revenue Services or your tax advisor as to any potential tax liability relating to your business.

1. NAME OF THE LIMITED LIABILITY COMPANY

## national Auditing Seruices of Consulting lle

2. NATURE OF BUSINESS TO BE TRANSACTED OR THE PURPOSES TO BE PROMOTED
UTILITY AUDITING
3. PRINCIPAL OFFICE ADDRESS (See instructions for further details)

$$
\begin{aligned}
& 65 \text { HIGA RIdge ROAD \# } 253 \\
& \text { STAMIVRO, CT O } 6905
\end{aligned}
$$

4.MAILING ADDRESS ( if other than principal office address)
5. APPOINTMENT OF STATUTORY AGENT FOR SERVICE OF PROCESS

| Name of agent <br> Carmine Nuzzi | Business address (P.O. Box is not acceptable) |
| :---: | :---: |
|  | Residence address (P.O. Box is not acceptable) $65 \mathrm{H} / G / \mathrm{Fidge}$ POAD $\# 253$ STAMERO, CT <br> 06905 |
|  | Acceptance of appointment |

6. MANAGEMENT
(Place a check mark next to the following statement only if it applies)
The management of the limited liability company shall be vested in one or more managers.
7. MANAGER(S) OR MEMBER(S) INFORMATION


Reference an $81 / 2 \times 11$ attachment if additional space is required

Ownership for National Auditing Services \& Consulting, LLC
Officer Name and Title: Carmine Nuzzi, Member
Officer Address: 500 Purdy Hill Rd. Ste 4 Monroe CT 06468
Officer Phone: 203-854-8503
Officer Email: cnuzzi@nascaudits.com
Officer Date of Birth: 01/02/1966
Officer Social Security Number: 041-66-0827
Officer Percentage of Ownership: 100\%

## Exhibit B

## Proof of Service

## Appendix C

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

## Example CERTIFICATE OF SERVICE

On this the 29th day of October 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:

Bureau of Investigation \& Enforcement Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120
Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101
Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

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

Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

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

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

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946
Vice President - Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830
Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179
UGI Utilities, Inc.
Attn: Rates Dept. - Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, Pa 19612-2677
Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138

Wellsboro, PA 16901


Carmine Nuzzi, Président/Managing Member of National Auditing Services \& Consulting LLC dba National Energy Discounters

## Exhibit C

## Bond

Original sent directly to PA PUC

## Exhibit D

## Financial Fitness

## Confidential sent directly to PUC

## Exhibit E

Tax Certification- sent directly to PA PUC

## Exhibit F

## Technical Fitness

# Carmine Nuzzi 

35 William Street
Norwalk, CT 06851
(203) 273-7630

Email: cnuzzi@nascaudits.com

## Objective

Motivated individual with extensive experience in utility bill auditing and energy procurment.

## Knowledge/Skills

Extensive Utility Bill Auditing Skills
Understanding of Deregulated Energy Markets

## Education

Central Connecticut State University $\quad$ New Britain $\quad$ 1984-1987
BS in Accounting

## Professional Experience

Independent consultant for 26 years

## Work History

## National Auditing Services \& Consulting, Utility Bill Auditor 1988- Current

Carmine holds a BS in accounting/auditing and has spent the last 20 years as an independent contractor in the utility auditing sector. During my tenure as an independent contractor, I have secured millions of dollars in electric and gas overcharges. My utility auditing expertise provides the ability to audit electric and gas energy bills on a national basis and I have been instrumental in developing energy procurement procedures for our customers.

Carmine Nuzzi, principle of National Auditing Services Consulting LLC, $\mathrm{d} / \mathrm{b} / \mathrm{a}$ National Energy Discounters holds a BS in accounting/auditing and has spent the last 20 years as an independent contractor in the utility auditing sector and last 10 years in the energy procurement industry.

National Auditing Services LLC has been a member of the Connecticut BBB for the past 10 years and has achieved an A+ rating. National Energy Discounters is also a member of the Norwalk Chamber of Commerce and an affiliate member of the Manufacturing Alliance of Connecticut.

National Energy Discounters Procurement Program is specifically designed to accommodate enterprises or individuals that don't have the time or resources to devote to the energy procurement process but still want to secure the best prices available in the marketplace.

At National Energy Discounters we are committed to work diligently with our customers. We provide our customers different pricing options from various energy suppliers to choose from, our customers are able to choose the plan that works best for them. We offer both variable and fixed rates. We bring the complexities of the energy commodity market to them in understandable terms

National Auditing Services \& Consulting License List

IL Electric Broker 17-0931
MA Electric Broker EB-14
MA Gas Broker RA-136
NJ Energy Agent EA-0369
OH Electric Broker 16-1039-EL-AGG

## STATE OF ILLINOIS

## ILLINOIS COMMERCE COMMISSION

| National Auditing Services $\&$ | $:$ |  |
| :--- | :--- | :--- |
| Consulting, LLC | $:$ | $17-0931$ |
| Application for Licensure of | $:$ |  |
| Agents, Brokers, and Consultants | $:$ |  |
| under Section 16-115C of the | $:$ |  |
| Public Utilities Act. | $:$ |  |

## ORDER

By the Commission:

## I. INTRODUCTION

On December 11, 2017, National Auditing Services \& Consulting, LLC ("Applicant") filed a verified Application with the Illinois Commerce Commission ("Commission") requesting a certificate of service authority to operate as an agent, broker, or consultant ("ABC") in Illinois pursuant to Section 16-115C of the Public Utilities Act ("Act"), 220 ILCS 5/1-101 et seq., and 83 III. Adm. Code 454, "Licensure of Retail Electric Agents, Brokers and Consultants" ("Part 454"). Applicant requests authority to offer services as an ABC for the procurement or sale of retail electricity supply for third parties in the State of Illinois. Since all of the information to grant the requested relief was contained in the Application, the evidentiary hearing was waived.

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

Applicant is a business organized under the laws of Connecticut and authorized to transact business in Illinois. Applicant has certified that it will comply with all applicable regulations; that it will comply with informational and reporting requirements established by Commission rule; that it will comply with informational and reporting requirements pursuant to Section 16-115C of the Act; and that it will comply with all other applicable laws, regulations, terms, and conditions required to the extent they have application to the services being offered by an $A B C$. Applicant has agreed to ensure that any person who acts on its behalf will comply with all applicable sections of Part 454. Applicant agrees that it will remain in compliance with the provisions of the Act and Part 454, and will ensure that authorizations received from customers, and all other applicable records are retained for a period of not less than three calendar years after the calendar year in which they were created. Applicant has agreed to adopt and follow rules and procedures to preserve the confidentiality of its customers' data. The Applicant has also attested that no complaints have been filed against it for its provision of services in the electric or gas industry in the jurisdictions where it provides or is seeking to provide services.

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

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

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

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

## IV. COMMISSION CONCLUSION AND CERTIFICATE OF SERVICE AUTHORITY

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

## CERTIFICATE OF SERVICE AUTHORITY

IT IS CERTIFIED that National Auditing Services \& Consulting, LLC is granted service authority to operate as an agent, broker, or consultant for the procurement or sale of retail electricity supply for third parties in the State of Illinois.

## V. FINDINGS AND ORDERING PARAGRAPHS

The Commission, having reviewed the entire record, is of the opinion and finds that:
(1) National Auditing Services \& Consulting, LLC, a business organized under the laws of Connecticut and authorized to transact business in Illinois, seeks a certificate of service authority to operate as an ABC under Section 16115C of the Act;
(2) the Commission has jurisdiction over the party hereto and the subject matter hereof;
(3) the recitals of fact and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
(4) National Auditing Services \& Consulting, LLC has demonstrated that it possesses sufficient financial, managerial, and technical resources and abilities to provide services as an ABC for the procurement or sale of retail electricity supply to third parties in the State of Illinois;
(5) National Auditing Services \& Consulting, LLC has complied with Section 16115C of the Act and Part 454; and
(6) National Auditing Services \& Consulting, LLC should be granted a certificate of service authority to operate as an ABC as specified in this Order.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that National Auditing Services \& Consulting, LLC is hereby granted a Certificate of Service Authority authorizing it to operate as an agent, broker, or consultant; said Certificate of Service Authority shall read as that set forth in Section IV of this Order.

IT IS FURTHER ORDERED that National Auditing Services \& Consulting, LLC shall comply with all applicable Commission rules and orders now and as hereafter amended.

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

By Order of the Commission this 7th day of March, 2018.

## (SIGNED) BRIEN SHEAHAN

Chairman

Phil Murphy

Lt. Governor

Governor
Sheila Oliver

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

Aida Camacho-Welch Office of the Secretary (609) 292-1599

July 10, 2019

Gregory Scheffler
C/O LicenseLogix
National Auditing Services \& Consulting, LLC
d/b/a National Energy Discounters
140 Grand Street
\#300
White Plains, New York 10601
Re: Energy Agent Renewal Registration Dkt. No. EE19040496L

Dear Mr. Scheffler:
In accordance with the Electric Discount and Energy Competition Act of 1999, N.J.S.A. 48:3-49 et seq., at its July 10, 2019 Agenda meeting, the New Jersey Board of Public Utilities renewed the REGISTRATION as an Energy Agent to National Auditing Services \& Consulting, LLC d/b/a National Energy Discounters. Your registration number is EA-0369.

The enclosed registration is effective July 10, 2019 and will expire on July 9, 2020. This registration and the rights thereunder are Non-Transferable.
This letter is not an endorsement of, nor is it intended for use in, the marketing promotions of the registrant. Registrants shall comply with all applicable law, including the Electric Discount and Energy Competition Act, which prohibits the unauthorized change of a customer's energy provider and other fraudulent and illegal marketing activities.

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

Sincerely,

ACW/dec
Encl.(s)


# PUBLIC UTILITIES COMMISSION OF OHIO <br> Certified as a Competitive Retail Electric Service Provider 

RENEWAL<br>Certificate Number:<br>16-1086E (2)

Issued Pursuant to Case Number(s):

## 16-1039-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to National Auditing Services \& Consulting LLC, whose office or principal place of business is located at 500 Purdy Hill Road, Ste 4, Monroe, CT 06468 to provide power broker services within the State of Ohio effective June 15, 2018.

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(0113) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

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

Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.
Witness the seal of the Commission affixed at Columbus, Ohio.
Dated June 20, 2018

> By Order of

## PUBLIC UTILITIES COMMISSION OF OHIO



Certificate Expires: June 15, 2020




## CRES AUTOMATIC CASE ACTION FORM

## Date: 6-19-18

Case Number: 16-1039-EL-AGG
Company Name and Company Name d/b/a: National Auditing Services \&
Consulting LLC
Company Address: 500 Purdy Hill Road Suite 4 Company City/State/Zip: Monroe CT 06468

Regulatory Contact: Carmine Nuzzi
Phone: 203-854-8503
Email: cnuzzi@nascaudits.com
Address: 500 Purdy Hill Road Suite 4
City/State/Zip: Monroe CT 06468

## Q Renewal

## Action Needed:

Issue Certificate Number to:
Effective Date of Certificate: Certificate Expires:
$\triangle$ Renew Certificate Number from: 16-1086E (1) to: 16-1086E (2)
Effective Date of Certificate: 6-15-18 Certificate Expires: 6-15-20
】Certified To Provide the Following Services:Retail GenerationAggregation
$\square$ Power Marketer
$\triangle$ Power Broker
$\square$ Governmental Aggregation
$\square$ Revise Certificate Number: to (check all applicable):
$\square$ Reflect name change from:
to
$\square$ Reflect address change from:
to
$\square$ Correct Administrative Error:
$\square$ Reflect Change of Ownership to:
$\square$ Cancel Certificate Number:Protect Un-redacted copies until:
$\square$ Close Case File, Case Withdrawn at Applicant's Request
$\square$ Close Case File


APPLICANT
PARTY OF RECORD
TING SERVICES \& CONSULTING LLC NONE
NATIONAL AUDITING SERVICES \& CONSULTING LLC NONE
CARMINE NUZZI
500 PURDY HILL RD, STE 4
MONROE,CT 06468
Phone:203-854-8503
Fax:888-673-0249
Email:CN@NATIONALENERGYDISCOUNTERS.COM
ATTORNEY
$\qquad$

## THE COMMONWEALTH OF MASSACHUSETTS

## DEPARTMENT OF PUBLIC UTILITIES

## CHARLES D. BAKER

GOVERNOR
KARYN E. POLITO
LIEUTENANT GOVERNOR
KATHLEEN A. THEOHARIDES
SECRETARY OF ENERGY
AND ENVIRONMENTAL AFFAIRS

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

July 22, 2019

Robine Guillaume, Assistant Account Manager
National Energy Discounters d/b/a National Auditing Services \& Consulting 140 Grand Street, Suite 300
White Plains, NY 10601
Dear Ms. Guillaume,
The Department of Public Utilities has reviewed National Energy Discounters d/b/a National Auditing Services \& Consulting's ("Company") application for renewal of its Electricity Broker License, EB-314, 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 May 1, 2020. The renewal application is available at: https://www.mass.gov/information-for-competitive-suppliers-and-electricity-brokers.

Sincerely,


Cecile M. Fraser Delegated Commissioner

THE COMMONWEALTH OF MASSACHUSETTS

## DEPARTMENT OF PUBLIC UTILITIES

CHARLES D. BAKER
GOVERNOR
KARYN E. POLITO
LIEUTENANT GOVERNOR
KATHLEEN A. THEOHARIDES
SECRETARY OF ENERGY
AND ENVIRONMENTAL AFFAIRS

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

MATTHEW H. NELSON
CHAIR
ROBERT E. HAYDEN
COMMISSIONER
CECILE M. FRASER
COMMIISSIONER

June 5, 2019
Robine Guillaume
National Auditing Services \& Consulting, LLC
140 Grand Street, Suite 300
White Plains, NY 10601
Ms. Guillaume,
The Department of Public Utilities has reviewed National Auditing Services \& Consulting, LLC d/b/a National Energy Discounters' ("NED") renewal application for its Gas Retail Agent license to serve residential and commercial and industrial customers in the Commonwealth of Massachusetts. I am pleased to inform you that the Company's renewal application has been approved. NED's license number is RA-136.

As a condition of maintaining its license, NED must file updated information within 30 days of any material change in the information required by 220 CMR 14.04(2), and must comply with all relevant requirements of G.L. c. 164, and the regulations promulgated thereunder, including 220 CMR 12.00, 14.00. If you decide to request a renewal of NED's license next year, please submit the renewal application no later than April 1, 2019.

Sincerely,


Exhibit G
Affidavits

## Appendix A

## APPLICATION AFFIDAVIT

[Commonwealth/State] of $\qquad$ :
ss.


Carmine $\mathrm{Nuzzi}_{\mathrm{Zz}}$, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:
[He/she is the President/Managing Member (Office of Affiant) of or $\begin{aligned} & \text { National Auditing Services \& Consulting Lac } \\ & \text { Locational Energy Discounters }\end{aligned}$ (Name of Applicant);]
[That he/she is authorized to and does make this affidavit for said Applicant;]
 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 $\begin{aligned} & \text { National Auden Sevicoss } 8 \text { Consulting } \text { dec } \\ & \text { Notional Energy Discounters }\end{aligned}$ has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

National Auditing Services \& Consulting LLC
That the Applicant herein doa National Energy Discounters acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.
 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.


Sworn and subscribed before me this $\qquad$ day of $\qquad$ November .2018.


Signature of official administering oath

My commission expires $1 / 31 / 2022$

Appendix B

## OPERATIONS AFFIDAVIT

[Commonwealth/State] of $\qquad$ : : ss.

## County of $F_{A} \mid R$ F, ẼCD

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

National Auditing Services \& Consulting, LLC d/b/a National Energy Discounters
[ $\mathrm{He} /$ she is the President/Managing Member (Office of Affiant) of $\qquad$ (Name of Applicant);]
[That he/she is authorized to and does make this affidavit for said Applicant;]

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

National Auditing Services 8 Consulting LLC
aba National Energy Discounters
That $\qquad$ _, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render electric service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That $\qquad$ 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. $\S 2810$ (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)

National Auditing Services \& Consulting LLC
That doa National Energy Discounters , the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. $\S 506, \S 2807$ (C), $\S 2807(D)(2), \S 2809(B)$ 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.


Sworn and subscribed before me this $\qquad$ day of November , 20 $\qquad$


My commission expires $\qquad$ $1 / 31 / 2022$

Exhibit H

Publications

# 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:

August 14, 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 14th day of August 2019.


My Commission Expires:


COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAS
CIMOY JAKUBOWSKI, Notary Public

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

## LICENSELOGIX

SUITE 300
140 GRAND STREET WHITE PLAINS NY 10601

Account \# 629558
Order \# 82364262
Ad Price: 342.15

## NATIONAL AUDITING SERVICE

## Ann Marie Fortes

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:

08/13/2019
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
 $-$

Sworn and subscribed to before me this 13th day of August A.D., 2019

(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

# PROOF OF PUBLICATON OF NOTICE IN THE WILLIAMSPORT 

## SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929

## STATE OF PENNSYLVANIA

## COUNTY OF LYCOMING

## SS:


#### Abstract

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:




Affiant further deposes that he is an officer daily 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.


THE SUN-GAZEITE 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.

## COMMONWEALTH OF PENNSYLVANIA County of Cambria

On this 16th day of August 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 TribuneDemocrat, 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,
ty of Cambria, and Commonwealth of Pennsylvania and e matter published in said publication in the regular issues on August 13, 2019; and that the Affiant is not interested
that all of the allegations as to time, place and character


| 0.00 Lines © $\$ 2.50$ per line | 0.00 |
| :--- | :--- |
| 8 Inches © $\$ 25.00$ per inch | 200.00 |
| Notary Fee | 5.00 |
| Clerical Fee | 2.50 |
| Total Cost | 207.50 |

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

$\qquad$ for publisher of $\qquad$
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 $\qquad$

## LICENSE LOGIX

140 GRAND ST SUITE 300 WHITE PLAINS NY 10601

REFERENCE: 122994373325
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: 08/15/19

TOTAL COST: \$543.00 AD SPACE: 0 Lines

FILED ON: 08/15/19

## PENNSYLVANIA

PUBLIC UTILITY COMMISSION NOTICE
Applications of National Auditing Services \& Conrufing LLC dible National' Energy Discounters For Approval To Offer. Render, or Furnish Services as a Sapplier, Aggregator, and MarketerlBroker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Suppty or Electric Generarion Services. To The Public In The Commonwealth Of Pennsylvania.

National Auditing Servicen \& Consulting LLC dba National Eoergy Discounters will be filing an application with the Peansylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a brokerimarketer engaged in the business of providing natural gas services National Auditing Services \& Consulting LLC dba National Energy Discounters will also be filing an application with the PUC for a license to supply electricity or electric generation services as a broker/marketer enguged in the business of supplying electricity. National Auditing Services \& Consuling L.LC dba National Energy Discomters proposes to sell electricity, natural gas and related services throughout all of Pennsylvania under the provisions of the new Natural Gas Choice, and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PỤC may consider this application without a hearing. Protests directed to the technical or financial fitness of Natlooal Additing Serrices \& Cousulting LLC dba Nationel Energy Discounters msy be filed within IS days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to National Asditing Services \& Consulting LLC dba National Energy Discouaters at the address listed below.
National Auditing Services \& Consulting LLC dba Nutioual Energy Discounters Address 500 Purdy Hill Rd., Ste 4 Monroe, CT 06851

Pbone: 203-854-8555
Fax: 844-727-9813

COMMONWEALTH OF PENNSYLVANIA

| NOTARIAL SEAL. |
| :---: |
| Barbara J. Moore, Notary Public |
| City of Erie, Erie County |
| My Commission Expires March 23, 2020 |
| MEMSER. PENNSYMANA ASSOCIAYON OF NOTARES |

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 D. Rullo $\qquad$ , being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Commonwealth aforesaid, was Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette whe Pitsburgh Press and the Pittsburgh PostPittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Pest-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 $\qquad$ editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

14 of August, 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.


Sworn to and subscribed before me this day of: August 14, 2019


## STATEMENT OF ADVERTISING COSTS

LicenseLogix LLC
140 GRAND ST STE 300
AttN: Shayna Desai
WHITE PLAINS NY 10601-4840

## To PG Publishing Company

Total $\$ 573.50$

## 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 aforsaid 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.

| COPY OF NOTICE or PUBLICATION |
| :---: |
|  |

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 08/13/2019


Principal Clerk of the Publisher
Sworn to and subscribed before me this 14th day of August 2019


COMMONWEALTH OF PENNSYLVANIA NOTARIAL SEAL
Crystal B. Rosensteel, Notary Public Susquehanna Twp., Dauphin County My Commission Expires June 27, 2020 MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

PENNSYLVANIA
PUBLIC UTILITY COMMISSION NOTICE
Applications of National Auditing
Services \& Consulting LLC d/b/a National Energy Discounters For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, and
Marketer/Broker Engaged In The
Business Of Supplying Natural Gas
Supply Services and Electricity Supply
or Electric Generation Services, To The
Public In The Commonwealth Of
Pennsylvania.
National Auditing Services \&
Consulting LLC dba National Energy
Discounters 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. National Auditing Services \&
Consulting LLC dba National Energy
Discounters will also be filing an
application with the PUC for a license
to supply electricity or electric
generation services as a
broker/marketer ensaged in the
business of supplying electricity.
National Auditing Services \&
Consulting LLC dba National Energy
Discounters proposes to sell electricity,
natural gas, and related services
throughout all of Pennsylvania 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 National Auditing Services \&
Consulting LLC dba National Energy
Discounters may be filed within 15 days
of the date of this notice with the
Secretary of the PUC, 400 North Street,
Harrisburg, PA 17120 . You should send
copies of any protest to National
Auditing Services \& Consulting LLC
dba National Energy Discounters of the
address listed below.
National Auditing Services \&
Consulting LLC dba National Energy Discounters Address 500 Purdy Hill Rd., Ste 4

Monroe, CT 06851
Phone: 203-854-8555
Fax: 844-727-9813

