



May 21, 2020

VIA E-FILING

David P. Zambito

Direct Phone 717-703-5892

Direct Fax 215-989-4216

dzambito@cozen.com

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

Re: Application of Suvon, LLC d/b/a FirstEnergy Advisors for Approval to Offer, Render, Furnish, or Supply Electricity or Electric Generation Services as a Broker/Marketer to the Public in the Commonwealth of Pennsylvania; Docket No. A-2020-_____

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission ("Commission") is the above-referenced application of Suvon, LLC d/b/a FirstEnergy Advisors ("Suvon"). Please note that, in accordance with Commission procedures during the COVID-19 pandemic, Suvon will file Confidential Attachments separately via e-mail. Also, please note that Suvon will supplement this filing with the required proofs of publication of newspaper notice, when they are received, as well as corrected fictitious name certificates of registration from the Pennsylvania Department of State. The enclosed certificates of registration mistakenly state that Suvon is a Delaware limited liability company rather than an Ohio limited liability company; but are otherwise correct.

The \$350 application filing fee has been paid via corporate credit card. Copies of this filing have been served as shown on the attached certificate of service.

Thank you for your attention to this matter. If you have any question or concern, please contact me.

Sincerely,

COZEN O'CONNOR

By: David P. Zambito

DPZ

Enclosures

cc: Per Certificate of Service
Scott Casto, Esq.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Suvon, LLC, d/b/a FirstEnergy Advisors, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) Broker/Marketer to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

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

Applicant: Suvon, LLC d/b/a FirstEnergy Advisors
Address: 76 S. Main Street
Akron, Ohio 44308
Telephone: (330) 374-6527
Website: www.firstenergyadvisors.com

Suvon, LLC also does business under the trade name FirstEnergy Home.

- 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.

Suvon, LLC c/o CT Corporation System
600 N. 2nd Street, Suite 401
Harrisburg, PA 17101
Tel: (866) 925-9916
Fax: Not Applicable

- 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.

Regulatory Contact:
Lorraine Rader
Director, Energy Sales
76 S. Main Street
A-GO-17
Akron, Ohio 44308
Tel: (330) 374-6527
Fax: (330) 777-3171
Email: lrader@firstenergycorp.com

Alternate Regulatory Contact:
Rick Charles
Director, FirstEnergy Product Operations
76 S. Main Street
A-GO-17
Akron, Ohio 44308
Tel: (330) 384-4689
Fax: (330) 777-3171
Email: charlesr@firstenergycorp.com

- 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.

David P. Zambito
Cozen O'Connor
17 North Second Street, Suite 1410

Harrisburg, PA 17101
Tel: (717) 703-5892
Fax: (215) 989-4216
Email: dzambito@cozen.com

- 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.

Primary Contact:
Lorraine Rader
Director, Energy Sales
76 S. Main Street
A-GO-17
Akron, Ohio 44308
Tel: (330) 374-6527
Fax: (330) 777-3171
Email: lrader@firstenergycorp.com

Alternate Contact:
Lance Bolender
Sales Consultant
76 S. Main Street
A-GO-17
Akron, Ohio 44308
Tel: (330) 315-7307
Fax: (330) 777-3171
Email: bolenderl@firstenergycorp.com

2. **BUSINESS ENTITY FILINGS AND REGISTRATION**

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

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

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

See Attachment 2a, Fictitious Name Filings.

OR

The Applicant will not be using a fictitious name.

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

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

The Applicant is a sole proprietor.

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

OR

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa. C.S. §8511)

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

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

OR

The Applicant is a:

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

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

See Attachment 2a, Fictitious Name Filings, from 2.a. above.

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

Suvon, LLC was incorporated in the state of Ohio. See Attachment 2b-1 for a copy of the Applicant's charter documentation.

- Give name and address of officers.

See Attachment 2b-2, Principal Officers, Directors & Partners.

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.

See Attachment 3a, Affiliates, for the names and addresses of affiliates currently doing business.

The following affiliates of the Applicant are jurisdictional public utilities: American Transmission System, Incorporated; Metropolitan Edison Company; Mid-Atlantic Interstate Transmission, LLC;

PATH Allegheny Transmission Company, LLC; Pennsylvania Electric Company; Pennsylvania Power Company; Trans-Allegheny Interstate Line Company; The Waverly Electric Light and Power Company; and West Penn Power Company.

Applicant does not have any affiliates that are currently applying to do business in Pennsylvania.

- 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 does not have any predecessors that have done business.

4. OPERATIONS

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

Definitions

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

- The Applicant is presently doing business in Pennsylvania as a

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

or

- The Applicant is not presently doing business in Pennsylvania.

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

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

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

As a broker, Suvon, LLC d/b/a FirstEnergy Advisors ("FE Advisors") will help customers of all classes evaluate their energy needs and facilitate the selection of retail suppliers. FE Advisors will serve as a consultant to customers, gathering data, interfacing with retail suppliers and helping customers review their options. FE Advisors will advise on market trends, price and risk associated with various options, energy efficiency opportunities, understanding utility tariffs and help coordinate the contract and renewal process.

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

- Citizens' Electric
 Duquesne Light
 Met-Ed
 PECO
 Penelec
 Penn Power

- Pike
 PPL
 UGI Utilities
 Wellsboro
 West Penn

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.

After this application is approved.

5. COMPLIANCE

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

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

The Applicant has not and is not currently a defendant in a criminal or civil proceeding. For affiliate legal matters, please see the most recent FirstEnergy Corp. SEC filings at: <https://investors.firstenergycorp.com/IRW/Docs/4056944>

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

Please see the response to 5.a. 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.

No complaints have been filed against the Applicant. For affiliate matters, please see the response to 5.a. above.

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

Please see the response to 5.a. 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)

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

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

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

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

Department of Revenue
Bureau of Compliance
PO Box 281230
Harrisburg, PA 17128-1230

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

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

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

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

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

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

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

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

UGI:
UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

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

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

See Attachment 6, Certificate of Service.

7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2809(c)(1)(i), the Applicant is required to file a bond or other instrument to ensure its financial responsibilities and obligations as an EGS. Therefore, the Applicant is...
- Furnishing the **ORIGINAL** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$250,000.
 - Furnishing the **ORIGINAL** of another initial security for Commission approval, to ensure financial responsibility, such as a parental guarantee, in the amount of \$250,000.

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

See Attachment 7a, Bonding. **CONFIDENTIAL**

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.

See Attachment 7b, Summary Organizational Structure.

- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient).

Please see the most recent SEC filings for FirstEnergy Corp. at <https://investors.firstenergycorp.com/IRW/Docs/4056944>

- 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.

See Attachment 7b, Credit Report (CONFIDENTIAL).

- 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 Attachment 7b, Forecasted Financial Statements (CONFIDENTIAL).

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.

Applicant is operating only as a broker.

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

FirstEnergy Advisors will engage in contracts with suppliers for payment of our services. Generally, suppliers pay brokers based on a cent/kWh that customer has used and paid for.

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.

**Tracy Ashton
Controller
76 S. Main Street**

Akron, Ohio 44308
Tel: (330) 761-4111
Fax: (330) 436-8016
Email: tashton@firstenergycorp.com

- 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.

See Attachment 7f, Tax Certification Statement (CONFIDENTIAL).

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 Attachment 8a, Experience, Plan, Structure. Suvon, LLC d/b/a FirstEnergy Advisors was granted a broker license in Ohio on April 23, 2020.

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

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

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

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

Not applicable.

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.

FirstEnergy Advisors' marketing will be done via phone, web, face to face and possibly mail. Eventually, FirstEnergy Advisors may engage a sales force to cover more territory to work the medium sized commercial/industrial customer base. This would be a direct customer contact sales force and may be outsourced.

FirstEnergy Advisors' process is to review its marketing material with our internal Communications group who then sends this material to our Legal department. All material is thoroughly reviewed for compliance with all Pennsylvania rules and regulations.

Before FirstEnergy Advisors considers using any outside contractor for service, an RFP will be developed and our internal vendor management team will qualify that vendor based on approval of qualifications. If FirstEnergy Advisors does engage outside contractors to handle small commercial/industrial channel customers, we would develop training process documents and require contractors to supply reports of training sessions and quality scoring. Any field training material will be vetted through Communications and Legal teams. FirstEnergy Advisors will supply training materials and face to face training. We would evaluate quality scoring from field and would record sessions and outcomes. We would also accompany any field sales group on a random basis to confirm report results.

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.

Please see the response to 2.b. for a list of officers. Brian Farley and Lorraine Rader are the officers directly responsible for operations, and their professional resumes are attached. See Attachment 8e, Professional 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 _____.
- 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.

Not applicable, as Applicant is applying for a license only as a broker.

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

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

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

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

(Select only one of the following)

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

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

AGREED

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

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

AGREED

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

AGREED

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

ACKNOWLEDGED

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

AGREED

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

AGREED

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

AGREED

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

AGREED

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

AGREED

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

PAYMENT ENCLOSED

11. AFFIDAVITS

Must be notarized before filing.

- a. APPLICATION AFFIDAVIT:** Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.

See Attachment 11a, Application Affidavit.

- 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 Attachment 11b, Operations Affidavit.

12. NEWSPAPER PUBLICATIONS

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

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


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

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

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

See Attachment 12, Proof of Publication.

13. SIGNATURE

Applicant: 

By: Brian Farley

Title: VP Sales

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: Suvon, LLC d/b/a FirstEnergy Advisors

	Signature	
✓	Filing Fee (CERTIFIED CHECK OR MONEY ORDER ONLY)	
✓	Application Affidavit	
✓	Operations Affidavit	
	Proof of Publication	
✓	Bond, Letter of Credit, or Parental/Affiliate Guarantee	
✓	Tax Certification Statement	
	Commonwealth Department of State Verification	
✓	Certificate of Service	

Applicant's Use

PUC Secretary's Bureau Use

**Attachment 2a
FICTITIOUS NAME FILINGS**

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

CT Corporation System

FirstEnergy Advisors

The Bureau of Corporations and Charitable Organizations is happy to send your filed document. The Bureau is here to serve you and we would like to thank you for doing business in Pennsylvania.

Thank you for registering with the Department of State to do business in Pennsylvania. Like many other businesses, you may have employees, sell taxable products, or provide a taxable service to consumers in Pennsylvania. Please visit www.pa100.state.pa.us to register for Business Taxes with the PA Department of Revenue & Labor and Industry or visit www.Business.pa.gov to find answers to most common registration questions.

If you have any questions pertaining to the Bureau, please visit our website at www.dos.pa.gov/BusinessCharities Or you may contact us by telephone at (717)787-1057. Information regarding business and UCC filings can be found on our searchable database at www.corporations.pa.gov/Search/CorpSearch.

Entity number : 6991400

Entity# : 6991400
Date Filed : 12/23/2019
Pennsylvania Department of State

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

Return document by mail to:

CT - COUNTER


Name 12495939 So 10

Address nicole.grimme@wolterskluwer.com

City _____ State _____ Zip Code _____

Return document by email to: _____

**Registration of Fictitious Name
DSCB:54-311
(rev. 2/2017)**



TCO181224DD0232

Read all instructions prior to completing. This form may be

Fee: \$70

I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of 54 Pa.C.S. § 311 (relating to registration), the undersigned entity(ies) desiring to register a fictitious name under 54 Pa.C.S. Ch. 3 (relating to fictitious names), hereby state(s) that:

1. The fictitious name is:
FirstEnergy Advisors

2. A brief statement of the character or nature of the business or other activity to be carried on under or through the fictitious name is:
Electric power broker, e-commerce and other retail-sales of innovative consumer product offerings.

3. The address, including number and street, if any, of the principal place of business (P.O. Box alone is not acceptable):

<u>76 South Main Street</u>	<u>Akron</u>	<u>Ohio</u>	<u>44308</u>	<u>Summit</u>
Number and street	City	State	Zip	County

4. The name and address, including number and street, if any, of each individual interested in the business is:

Name	Number and Street	City	State	Zip

5. Each entity, other than an individual, interested in such business is (are):

Suvon, LLC	Limited Liability Company	Delaware
Name	Form of Organization	Organizing Jurisdiction
76 South Main Street, Akron, Ohio 44308		
Principal Office Address		
PA Registered Office, if any		
Name	Form of Organization	Organizing Jurisdiction
Principal Office Address		
PA Registered Office, if any		


6. The applicant is familiar with the provisions of 54 Pa.C.S. § 332 (relating to effect of registration) and understands that filing under the Fictitious Names Act does not create any exclusive or other right in the fictitious name.

7. (Optional): The name(s) of the agent(s), if any, any one of whom is authorized to execute amendments to, withdrawals from or cancellation of this registration in behalf of all then existing parties to the registration, is (are):


CT Corporation System

IN TESTIMONY WHEREOF, the undersigned have caused this Application for Registration of Fictitious Name to be executed this

19 day of December, 2019.

Individual Signature	Individual Signature
Individual Signature	Individual Signature
Suvon, LLC	Entity Name
	Entity Name
Signature Brett W. Reynolds	Signature
Vice President - Suvon, LLC	Title
Title	Title

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

<input type="checkbox"/> Return document by mail to: Ken System Brown Name 4400 EASTON CMNS WAY, STE 125 Address Columbus OH 43219 City State Zip Code <input type="checkbox"/> Return document by email to: _____	Registration of Fictitious Name DSCB:54-311 (rev.2/2017)  311
---	--

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

Fee: \$70.00

I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of 54 Pa.C.S. § 311 (relating to registration), the undersigned entity(ies) desiring to register a fictitious name under 54 Pa.C.S. Ch. 3 (relating to fictitious names), hereby state(s) that:

1. The fictitious name is:
FirstEnergy Home

2. A brief statement of the character or nature of the business or other activity to be carried on under or through the fictitious name is:
Electric power broker, e-commerce and other retail-sales of innovative consumer product offerings.

3. The address, including number and street, if any, of the principal place of business (P.O. Box alone is not acceptable):

76 South Main Street,	Akron	OH	44308	Out Of State
Number and street	City	State	Zip	County

4. The name and address, including number and street, if any, of each individual interested in the business is:

Name	Number and Street	City	State	Zip

5. Each entity, other than an individual, interested in such business is (are):

Suvon, LLC	Limited Liability Company	DE
Name	Form of Organization	Organizing Jurisdiction
76 South Main Street, Akron, Out Of State, OH, United States, 44308		
Principal Office Address		
PA Registered Office, if any		

6. The applicant is familiar with the provisions of 54 Pa.C.S. § 332 (relating to effect of registration) and understands that filing under the Fictitious Names Act does not create any exclusive or other right in the fictitious name.

7. (Optional): The name(s) of the agent(s), if any, any one of whom is authorized to execute amendments to, withdrawals from or cancellation of this registration in behalf of all then existing parties to the registration, is (are):

IN TESTIMONY WHEREOF, the undersigned has caused this Application for Registration of Fictitious Name to be executed this

16th day of August, 2019.

Suvon, LLC

Entity Name

Brett W. Reynolds

Signature

VP, Marketing, Product Development &
Energy Effici

Title

**Attachment 2b-1
CHARTER DOCUMENTATION**

LIMITED LIABILITY COMPANY

OPERATING AGREEMENT

OF

SUVON, LLC

TABLE OF CONTENTS

	<u>Page</u>
Article 1. Organization	1
1.1 Formation of the Company; Term	1
1.2 Name.....	1
1.3 Purpose of the Company; Powers.....	1
1.4 Principal Place of Business, Office and Agent.....	1
Article 2. Definitions	1
Article 3. Capitalization; Economics.....	2
3.1 Capital.....	2
3.2 Capital Accounts; Allocations.....	2
Article 4. Management	2
4.1 Board of Managers	2
4.2 Authority of the Board.....	2
4.3 Notice of Board Meetings	2
4.4 Location of Board Meetings	3
4.5 Waiver of Notice of Meeting.....	3
4.6 Required Vote.....	3
4.7 Voting; Proxies.....	3
4.8 Written Actions of the Board	3
4.9 Officers of the Company	3
Article 5. Membership; Powers and Duties of and Limitations on the Member.....	4
5.1 Initial Member.....	4
5.2 Rights of the Member	4
5.3 Limitations on the Rights of the Member.....	4
5.4 Limited Liability of the Member	5
5.5 Membership Interests; Certificates.....	5
Article 6. Exculpation and Indemnification.....	5
6.1 Exculpation.....	5
6.2 Indemnification.....	5
Article 7. General.....	6
7.1 Dissolution.....	6
7.2 Winding Up and Liquidation.....	6
7.3 Entire Agreement; Amendment.....	6
7.4 Invalidity.....	6
7.5 Governing Law	6
7.6 Construction	6

LIMITED LIABILITY COMPANY

OPERATING AGREEMENT

OF

SUVON, LLC

This is the Limited Liability Company Operating Agreement of Suvon, LLC, an Ohio limited liability company (the "**Company**"), effective as of December 14, 2017, made by FirstEnergy Corp., an Ohio corporation and the sole member of the Company (the "**Member**"). Unless the context otherwise requires, terms that are capitalized and not otherwise defined in context have the meanings set forth or cross-referenced in Article 2.

Article 1. Organization

1.1 Formation of the Company; Term. The Company is a limited liability company under the Law and is governed by this Agreement. The Company is an entity separate from the Member, created by the execution and filing of the Articles of Organization of the Company with the Secretary of State of the State of Ohio on September 25, 2017. Unless sooner dissolved and liquidated by action of the Member, the Company is to continue in perpetuity.

1.2 Name. The name of the Company is: "Suvon, LLC."

1.3 Purpose of the Company; Powers. The purpose of the Company is to carry on any lawful act or activity for which limited liability companies may be formed under the Law. The Company shall have all the powers necessary or convenient to carry out such purposes.

1.4 Principal Place of Business, Office and Agent. The principal place of business and mailing address of the Company is 76 South Main Street, Akron, Ohio 44308. The Company may also have offices at such other locations as the business of the company may require. The address where the records required by the Law are kept is 76 South Main Street, Akron, Ohio 44308, or such other location as the Member may select from time to time. The registered office of the Company in Ohio is at the office of the registered agent of the Company in Ohio: CT Corporation System, 1300 East 9th Street, Cleveland, Ohio 44114. From time to time, the Member may change the statutory agent or the principal place of business of the Company without reflecting the change in this Agreement.

Article 2. Definitions

"**Affiliate**" of any Person means any other Person that, directly or indirectly, controls, is controlled by or is under common control with such Person.

"**Agreement**" means this Limited Liability Company Operating Agreement, as amended from time to time.

"Fiscal Year" means the fiscal year of the Company, which shall end December 31 or such other date as the Board shall determine from time to time.

"Law" means the Ohio Limited Liability Company Law (Ohio Rev. Code chapter 1705), as amended from time to time. Any reference to the Law automatically includes a reference to any subsequent or successor limited liability company law in the State of Ohio.

"Person" or **"person"** means any natural person and any corporation, firm, partnership, trust, estate, limited liability company or other entity resulting from any form of association.

Article 3. Capitalization; Economics

3.1 Capital. The Member hereby agrees to contribute to the Company such cash, property, or services as determined by the Member; the Member shall have no obligation to make capital contributions. The Company is to finance its operations independently of the Member and without the Member's financial support.

3.2 Capital Accounts; Allocations. All items of income, gain, loss and deduction will be allocated to the Member. The Member or its designee will keep a record of the Member's contributions to the Company, the Company's income, gains, losses and deductions, and its distributions to the Member.

Article 4. Management

4.1 Board of Managers. (a) The Company shall be managed by a Board of Managers (the **"Board"**) initially composed of three managers. The initial managers appointed by the Member are Charles E. Jones, James F. Pearson and Dennis M. Chack. From time to time, the Member may elect additional managers to serve on the Board.

(b) Each manager is to serve until the earlier of his or her death, resignation or removal. The Member may remove or replace a manager at any time. Any manager may resign at any time by delivering his or her written resignation to the Member.

4.2 Authority of the Board. (a) Except as specifically reserved to the Member in this Agreement or as provided by applicable law, the Board has all power and authority to manage, and to direct the management of, the business and affairs of the Company in the ordinary course of its business consistent with the Law. Approval by or action taken by the Board in accordance with this Agreement is the approval or action of the Company and is binding on each manager and the Company.

(b) The Board may delegate to the officers, other employees and agents of the Company the authority to conduct the business of the Company in the ordinary course, in accordance with this Agreement and any policy of delegation which may be adopted and revised from time to time by the Board. Any power not delegated by the Board remains with the Board.

4.3 Notice of Board Meetings. Regular meetings of the Board may be held at such times and places as may be fixed by the Board. Special meetings of the Board may be called by the President, by the Secretary, or by any two managers. Notice of the time and place of a special or regular meeting of the Board is effective if delivered to each member of the Board by hand, mail, telecopy, telephone or electronic mail and received not less than one day prior to the time of such special meeting. Notices of special meetings of the Board are to identify the time, place, and purpose of the special meeting or the business to be transacted at the special meeting. The failure to specifically identify an action to be taken or business to be transacted does not invalidate any action taken or any business transacted at a special meeting.

4.4 Location of Board Meetings. Board meetings may be held at any location in the world. Members of the Board may participate in a meeting of the Board by means of conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other, and such participation in a meeting is presence in person at the meeting.

4.5 Waiver of Notice of Meeting. Whenever notice of a Board meeting is required to be given, a written waiver of notice, signed by the manager entitled to notice, whether before or after the time of the meeting, is equivalent to notice. Neither the business to be transacted at, nor the purpose of, any Board meeting need to be specified in any written waiver of notice thereof. A manager's attendance at a meeting is a waiver of notice of that meeting, except when the manager attends a meeting for the express purpose of objecting, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened.

4.6 Required Vote. The vote of at least a majority of the managers on the Board is approval by, or the authorization of, the Board. No manager on the Board is disqualified from acting on any matter because the manager is interested in the matter to be acted upon by the Board.

4.7 Voting; Proxies. Each manager on the Board has one vote. A manager has no power to authorize another person to vote on behalf of the manager, whether by proxy or other power of attorney.

4.8 Written Actions of the Board. Any action required or permitted to be taken at any meeting of the Board may be taken without a meeting if a majority of the managers on the Board consents thereto in writing, and the writing or writings are filed by the Company Secretary with the minutes of proceedings of the Board.

4.9 Officers of the Company. (a) The Member shall designate the initial officers of the Company. Thereafter, the Board may, from time to time, designate officers of the Company to carry out the day-to-day business of the Company.

(b) The officers of the Company shall be comprised of one or more individuals designated from time to time by the Board. Each officer shall hold his or her office for such term and shall have such authority and exercise such powers and perform such duties as shall be determined from time to time by the Board. Any number of offices may be held by the

same individual. The salaries or other compensation, if any, of the officers and agents of the Company shall be fixed from time to time by the Board.

(c) The officers of the Company shall consist of a president, controller, secretary and treasurer. The Board may also designate one or more vice presidents, assistant controllers, assistant secretaries, and assistant treasurers. The Board may designate such other officers and assistant officers and agents as the Board shall deem necessary.

(d) Any officer, including the initial officers, may be removed as such at any time by the Board, either with or without cause, in the sole discretion of the Board.

(e) The officers of the Company, to the extent of their powers set forth in this Agreement or otherwise vested in them by action of the Board not inconsistent with this Agreement, are agents of the Company for the purpose of the Company's business, and, the actions of the officers of the Company taken in accordance with such powers shall bind the Company.

(f) Unless otherwise specified elsewhere in this Agreement or by the Board from time to time, the officers of the Company will have such authority and perform such duties as are customarily incidental to their offices.

(g) The following persons be, and each of them hereby is, appointed to serve in the office of the Company set opposite his or her respective name, each to hold such offices from and after the date of this Agreement until his or her removal pursuant to this Agreement or until his or her respective successor is duly elected and qualified or until his or her earlier resignation or removal:

Dennis M. Chack	President
Brett W. Reynolds	Vice President, Marketing and Product Development
Steven R. Staub	Vice President and Treasurer
Ebony L. Yeboah-Amankwah	Vice President and Corporate Secretary
Jason S. Petrik	Controller
Gregory J. Gawlik	Assistant Controller, Tax Planning
Emily A. Ludgate	Assistant Controller, Tax Operations
Daniel M. Dunlap	Assistant Corporate Secretary
Ermal Fatusha	Assistant Treasurer

Article 5. Membership; Powers and Duties of and Limitations on the Member

5.1 Initial Member. The Member owns 100% of the membership interests in the Company.

5.2 Rights of the Member. The Member is entitled to have such rights and powers as are provided in this Agreement or by mandatory requirements of applicable law.

5.3 Limitations on the Rights of the Member. Subject to any mandatory requirements of applicable law, the Member (in its capacity as a Member) has no right to take

any part whatsoever in the management and control of the ordinary business of the Company, sign for or bind the Company, compel a sale or appraisal of Company assets or sell or assign its interest in the Company except as provided in this Agreement.

5.4 Limited Liability of the Member. The Member (solely in its capacity as a Member) has no obligation to contribute to the Company or any liability for any Company obligations. Any liability to return distributions made by the Company is limited to mandatory requirements of the Law or of any other applicable law.

5.5 Membership Interests; Certificates. The Company will not issue any certificates to evidence ownership of the membership interests.

Article 6. Exculpation and Indemnification

6.1 Exculpation. No manager of the Company (or any predecessor of the Company) shall be personally liable to the Company or the Member for monetary damages for any breach of fiduciary duty by such a manager as a manager to the full extent authorized or permitted by law (as now or hereafter in effect). Notwithstanding the foregoing sentence, a manager shall be liable to the extent provided by applicable law (i) for any breach of the manager's duty of loyalty to the Company or its Member, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law or (iii) for any transaction from which the manager derived an improper personal benefit. No amendment to or repeal of this Section 6.1 shall apply to or have any effect on the liability or alleged liability of any manager of the Company for or with respect to any acts or omissions of such manager occurring prior to such amendment or repeal.

6.2 Indemnification. (a) The Company shall indemnify to the fullest extent authorized or permitted by law (as now or hereafter in effect) any person made, or threatened to be made a party to or otherwise involved in any action or proceeding (whether civil or criminal or otherwise) by reason of the fact that he or she, his or her testator or intestate, is or was a manager or officer of the Company (or any predecessor of the Company) or by reason of the fact that such manager or officer, at the request of the Company, is or was serving any other corporation, partnership, joint venture, trust, employee benefit plan or other enterprise, in any capacity, against expenses reasonably incurred by him or her in connection with the defense or settlement of such action if he or she acted in good faith and in a manner reasonably believed to be in or not opposed to the best interests of the Company, except in relation to matters as to which he or she is adjudged in such action or proceeding to be liable for negligence or misconduct in the performance of duty to the company. Nothing contained herein shall affect any rights to indemnification to which employees other than managers and officers may be entitled by law. No amendment or repeal of this Section 6.2 shall apply to or have any effect on any right to indemnification provided hereunder with respect to any acts or omissions occurring prior to such amendment or repeal.

(b) Expenses incurred in defending any action or proceeding, civil or criminal, may be paid by the Company in advance of the final disposition of such action or proceeding notwithstanding any provisions of this Article to the contrary. But the manager, officer, employee, or agent so defended shall repay such expenses to the Company if it is

judicially determined that such manager, officer, employee, or agent is not entitled to indemnification as provided in this Article.

(c) The Company may purchase and maintain insurance on behalf of any person who is or was a manager, officer, employee or agent of the Company (or any predecessor of the Company) or was serving at the request of the Company as a manager, officer, employee or agent of another corporation, partnership, joint venture, trust, employee benefit plan or other enterprise against any liability asserted against him or her and incurred by him or her in any such capacity, or arising out of his or her status as such, whether or not the Company would have the power to indemnify him or her against such liability under the provisions of the law. The Company may create a trust fund, grant a security interest and use any other means (including, without limitation, letters of credit, surety bonds and other similar arrangements), as well as enter into contracts providing for indemnification to the fullest extent authorized or permitted by law and including as part thereof any or all of the foregoing, to ensure the payment of such sums as may become necessary to effect full indemnification.

(d) The rights to indemnification conferred in this Section 6.2 shall not be exclusive of any other right which any person may have or hereafter acquire under any statute, this Agreement or any agreement, any vote of members or managers or otherwise.

Article 7. General

7.1 Dissolution. The Company shall be dissolved only by action of the Member approving such dissolution or as otherwise required by applicable law.

7.2 Winding Up and Liquidation. If the Company is required to wind up its affairs and liquidate its assets, it will first pay or make provision to pay all of its obligations as required by law and any assets remaining will be distributed to the Member.

7.3 Entire Agreement; Amendment. This Agreement is the entire declaration of the Member with respect to the subject matter hereof and will only be amended by a writing duly signed by the Member that refers to this Agreement.

7.4 Invalidity. In the event that any provision of this Agreement is invalid, the validity of the remaining provisions of the Agreement are not in any way to be affected thereby.

7.5 Governing Law. This Agreement is governed by and is to be construed under the laws of the State of Ohio, without giving effect to its conflicts of laws rules.

7.6 Construction. The headings contained in this Agreement are for reference purposes only and do not affect the meaning or interpretation of this Agreement. All personal pronouns used in this Agreement, whether used in the masculine, feminine or neutral gender, include all other genders. Unless otherwise specifically stated, references to Sections or Articles refer to the Sections and Articles of this Agreement.

[Signature on the Following Page]

IN WITNESS WHEREOF, the undersigned has duly executed this Limited Liability Company Operating Agreement as of the date first above written.

FIRSTENERGY CORP.

By: 

Name: **Ebony L. Yeboah-Amankwah**

Its: **Vice President, Corporate Secretary
and Chief Ethics Officer**

**Attachment 2b-2
PRINCIPAL OFFICERS, DIRECTORS & PARTNERS**

Name	Title	Address
Dennis M. Chack	President and Manager	Suvon, LLC 76 S. Main Street Akron, OH 44308
Brett W. Reynolds	Vice President, Marketing and Product Development and Energy Efficiency	Suvon, LLC 76 S. Main Street Akron, OH 44308
Steven R. Staub	Vice President and Treasurer	Suvon, LLC 76 S. Main Street Akron, OH 44308
Ebony L. Yeboah-Amankwah	Vice President, Deputy General Counsel and Corporate Secretary	Suvon, LLC 76 S. Main Street Akron, OH 44308
Tracy M. Ashton	Controller	Suvon, LLC 76 S. Main Street Akron, OH 44308
Marlene A. Barwood	Assistant Controller	Suvon, LLC 76 S. Main Street Akron, OH 44308
Gregory J. Gawlik	Assistant Controller	Suvon, LLC 76 S. Main Street Akron, OH 44308
Charles E. Jones	Manager	Suvon, LLC 76 S. Main Street Akron, OH 44308
Steven E. Strah	Manager	Suvon, LLC 76 S. Main Street Akron, OH 44308
Lorraine M. Rader	Director, Energy Sales	Suvon, LLC 76 S. Main Street Akron, OH 44308
Brian A. Farley	Vice President, Sales	Suvon, LLC 76 S. Main Street Akron, OH 44308

**Attachment 3a
AFFILIATES**

*Indicates Pennsylvania jurisdictional public utility

Name	Address
AE Supply Renaissance Southwest, LLC	101 Convention Center Drive, Suite 850 Las Vegas, NV 89109
AET PATH Company, LLC	800 Cabin Hill Drive Greensburg, PA 15601
*American Transmission System, Incorporated	76 South Main Street Akron, OH 44308
Allegheny Energy Service Corporation	800 Cabin Hill Drive Greensburg, PA 15601
Allegheny Energy Supply Company, LLC	800 Cabin Hill Drive Greensburg, PA 15601
Allegheny Generating Company	800 Cabin Hill Drive Greensburg, PA 15601 and 210 S. Cameron Street Winchester, VA 22601
Allegheny Pittsburgh Coal Company	800 Cabin Hill Drive Greensburg, PA 15601
AYE Series, Potomac-Appalachian Transmission Highline, LLC	800 Cabin Hill Drive Greensburg, PA 15601
Allegheny Ventures, Inc.	800 Cabin Hill Drive Greensburg, PA 15601
Bay Shore Power Company	76 South Main Street Akron, OH 44308
Buchanan Energy Company of Virginia, LLC	800 Cabin Hill Drive Greensburg, PA 15601
CEI Funding LLC	76 South Main Street Akron, OH 44308
The Cleveland Electric Illuminating Company	76 South Main Street Akron, OH 44308
FirstEnergy Corp.	76 South Main Street Akron, OH 44308
FirstEnergy Fiber Holdings Corp.	76 South Main Street Akron, OH 44308
FirstEnergy Foundation	76 South Main Street Akron, OH 44308
FirstEnergy Properties, Inc.	76 South Main Street Akron, OH 44308

FirstEnergy Service Company	76 South Main Street Akron, OH 44308
FirstEnergy Transmission, LLC	5001 NASA Boulevard Fairmont, WV 26554
FirstEnergy Ventures Corp.	76 South Main Street Akron, OH 44308
FELHC, Inc.	76 South Main Street Akron, OH 44308
GPU Nuclear, Inc.	300 Madison Avenue Morristown, NJ 07962
Green Valley Hydro, LLC	800 Cabin Hill Drive Greensburg, PA 15601
Imperio, LLC	76 South Main Street Akron, OH 44308
Jersey Central Power & Light Company	300 Madison Avenue Morristown, NJ 07962
JCP&L Transition Funding II LLC	103 Foulk Road, Suite 202 Wilmington, DE 19803
*Metropolitan Edison Company	2800 Pottsville Pike Reading, PA 19605
*Mid-Atlantic Interstate Transmission, LLC	76 South Main Street Akron, OH 44308
Monongahela Power Company	5001 NASA Boulevard Fairmont, WV 26554
MP Environmental Funding LLC	101 Convention Center Drive, Suite 850 Las Vegas, NV 89109
MP Renaissance Funding, LLC	101 Convention Center Drive, Suite 850 Las Vegas, NV 89109
OE Funding LLC	76 South Main Street Akron, OH 44308
OES Ventures, Incorporated	76 South Main Street Akron, OH 44308
Ohio Edison Company	76 South Main Street Akron, OH 44308
PATH – Allegheny Land Acquisition Company	800 Cabin Hill Drive Greensburg, PA 15601
PATH Allegheny Maryland Transmission Company, LLC	800 Cabin Hill Drive Greensburg, PA 15601
*PATH Allegheny Transmission Company, LLC	800 Cabin Hill Drive Greensburg, PA 15601

PATH Allegheny Virginia Transmission Corporation	800 Cabin Hill Drive Greensburg, PA 15601
PE Environmental Funding LLC	101 Convention Center Drive, Suite 850 Las Vegas, NV 89109
PE Renaissance Funding, LLC	101 Convention Center Drive, Suite 850 Las Vegas, NV 89109
*Pennsylvania Electric Company	5404 Evans Road Erie, PA 16509
*Pennsylvania Power Company	233 Frenz Drive New Castle, PA 16101
The Potomac Edison Company	10802 Bower Avenue Williamsport, MD 21795
TE Funding LLC	76 South Main Street Akron, OH 44308
The Toledo Edison Company	76 South Main Street Akron, OH 44308
*Trans-Allegheny Interstate Line Company	800 Cabin Hill Drive Greensburg, PA 15601
Warrenton River Terminal, Ltd.	76 South Main Street Akron, OH 44308
*The Waverly Electric Light and Power Company	707 Main Street Towanda, PA 18848
*West Penn Power Company	800 Cabin Hill Drive Greensburg, PA 15601
West Penn Southwest, LLC	101 Convention Center Drive, Suite 850 Las Vegas, NV 89109
The West Virginia Power & Transmission Company	800 Cabin Hill Drive Greensburg, PA 15601

**Attachment 6
CERTIFICATE OF SERVICE**

On this the 21st day of May 2020, 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 the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

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

Department of Revenue
Bureau of Compliance
PO Box 281230
Harrisburg, PA 17128-1230

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

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

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

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

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

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

Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

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

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



Suvon, LLC d/b/a FirstEnergy Advisors

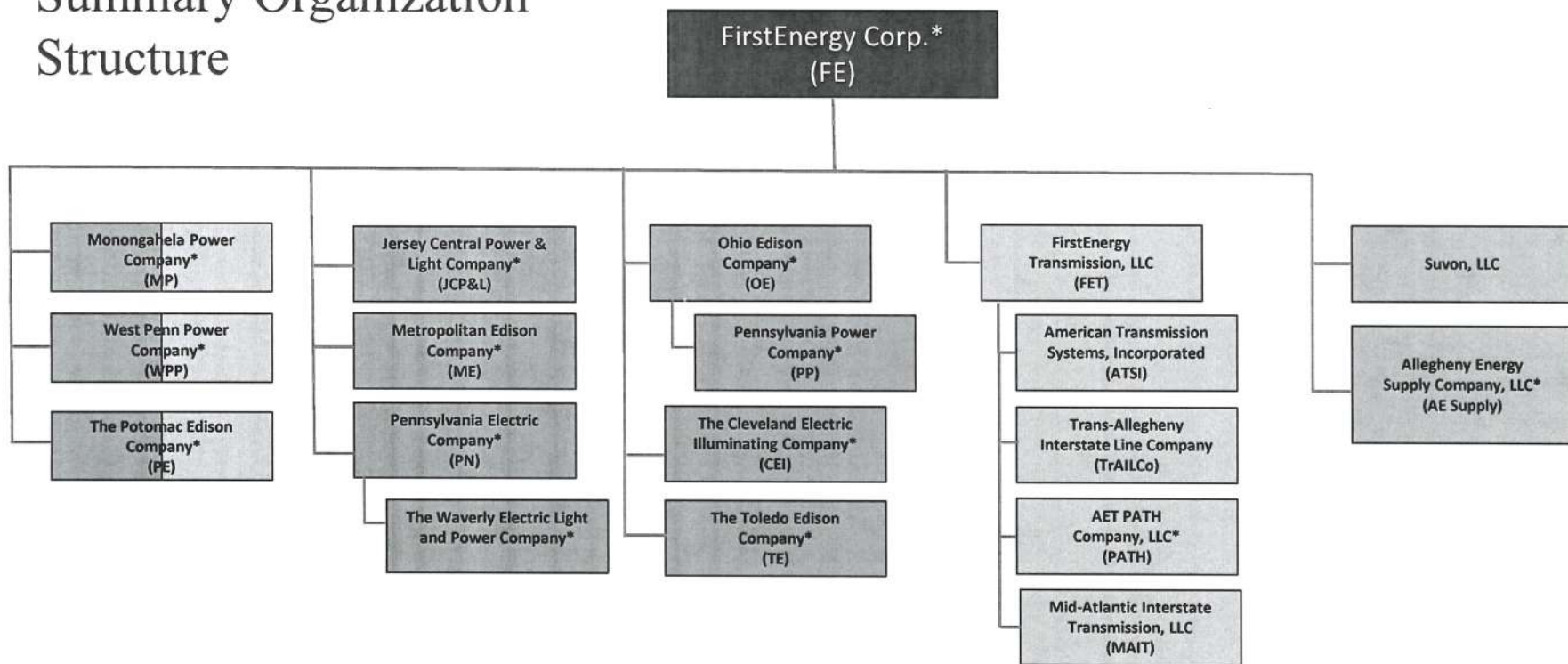
**Attachment 7a
BONDING**

Attachment 7b
FINANCIAL RECORDS, STATEMENTS, AND RATINGS

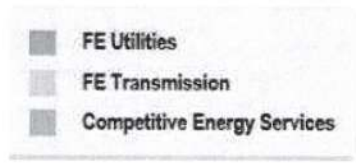
Attachment 7b contains the following documents:

- **Summary Organizational Structure**
- **Credit Report (CONFIDENTIAL)**
- **Forecasted Financial Statements (CONFIDENTIAL)**

Summary Organization Structure



*Entity has subsidiaries that are not shown



**Attachment 7f (CONFIDENTIAL)
TAX CERTIFICATION STATEMENT**

Attachment 8a
EXPERIENCE, PLAN, STRUCTURE

Ohio

**Public Utilities
Commission**

Sam Randazzo, Chairman

Commissioners

M. Beth Trombold
Lawrence K. Friedeman
Dennis P. Deters
Daniel R. Conway

FILE

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

Certificate Number:

20-1468E (1)

Issued Pursuant to Case Number(s):

20-0103-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to **Suvon, LLC dba FirstEnergy Advisors** whose office or principal place of business is located at **76 S. Main St., Akron, OH 44308** to provide **aggregation and power broker** services within the State of Ohio effective **April 23, 2020**.

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.

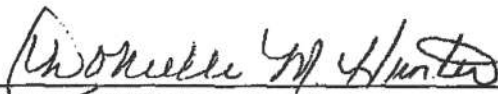
Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

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

Dated: **April 23, 2020**

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO



Tanawa M. Troupe, Secretary
Debbie Ryan, Acting Secretary
Donielle M. Hunter, Acting Secretary
Susan Patterson, Acting Secretary

Certificate Expires: **April 23, 2022**

This is to certify that the images appearing are an accurate and complete reproduction of the original document as filed in the Public Utilities Commission. Date Processed 4/23/20
614
46-3016
www.PUCO.ohio.gov

Applicant's previous experience in the electricity industry –

Current staff members have over 90 years of combined history in the electric and energy market. In the past 10 years, this group has focused on retail markets and has sold electric contracts to large, medium, and small industrial and commercial customers. They have also sold contracts to over 3 million residential customers via municipal aggregation and mail and web-based mass marketing Ohio and Pennsylvania. While Pennsylvania does not participate in municipal aggregation, we worked with agents in Pennsylvania who offered chamber programs and programs for various boroughs.

We have collectively garnered knowledge of PJM markets, utility tariffs (especially with respect to the supplier tariffs), regulatory rules, energy forwards, GATs, energy efficiency and pricing. Additionally, we have worked with all aspects of contracting from broker agreements, supplier agreements, customer agreements and standardized Terms and Conditions.

As a Broker in Pennsylvania, we will use our experience garnered from years as a supplier and years working for the utility to help customers minimize their market exposure and lower their supply side costs. Please review our resumes for further details.

Staffing structure and numbers as well as employee training commitments -

Staffing plans are fluid, and staffing levels will grow with the customer base. In Pennsylvania, FirstEnergy Advisors will focus on medium to larger commercial and industrial load. FirstEnergy Advisors will also work to develop and promote technology (web applications) that will help residential and small commercial customers find and sign up for offers that suit their needs. There are no plans to solicit door to door for any residential customer.

Proposed Team

- Sales Consultant Energy Sales - Energy expertise in gas and electric, someone who has done energy audits, worked with customers and sold in past. Technical energy expert
- Sales Manager/Consultant Energy Sales – National account, large account sales' rep to manage industrial, commercial sales opportunities
- Sales Rep V – Sales specialist who creates and manages SMI sales team. Will be senior sales' expert and will know where to target, what technology to use and have a history of field sales creation success. Will also develop technology to obtain customers in residential channel.
- Sales Reps (2) – Sales' rep versed in selling to medium and potentially large commercial and industrial customers
- Analyst – lower level analyst trained to keep track of group activity, margin earned and expenses

- **Training**

- Sales' Rep training is ongoing. Training in energy efficiency programs and resources has been developed. Call center training has been provided to our in-house call center. Staff has attended and plans to continue to attend industry seminars including the MEC. Sales will also work with regulatory group to make sure that sales work is within rules and guidelines provided by the Pennsylvania Public Utility Commission.
- External training – 2 sales reps intend to become certified energy managers in 2020.

Initial Sales Staffing



- Initial staffing 2020 – 4 experienced staff members to perform tasks of building Industrial, Small to Medium Commercial, Residential and Municipal Aggregation (Ohio only). One director of sales, 1 sales consultant, 1 sales rep to build SMC business and one part-time contracted sales rep for Ohio municipal Aggregation.
- Timing for other staffing positions to be determined

Business plans for operations within the Commonwealth -

Within the Commonwealth, FirstEnergy Advisors intends to provide fee-based energy broker/consulting services to customers who would like assistance in procuring electricity. We would:

- Serve as trusted advisors bringing energy expertise, brand name, relationship history and field experience to customers to negotiate best prices, terms and conditions for customer energy and product needs
- Develop direct client base of Commercial and Industrial customers who will hire FirstEnergy Advisors as their representative

- Develop Small, Medium Commercial/Industrial field sales team that can sell procurement services
- Develop website for sales brokering
- Develop a non-biased supplier base who will bid on customer load such that customer and supplier are positioned for success
- Continually monitor marketplace and develop product and sales expertise to meet customer needs
- Proactively meet sales goals in short, medium and long-term time horizons
- Evaluate and recommend partnering opportunities to grow business and improve services

Attachment 8e
PROFESSIONAL RESUMES

Attachment 8e contains the following documents:

- **Professional Resume of Brian Farley**
- **Professional Resume of Lorraine Rader**

Brian A. Farley

C: (216) 287 - 6612

11450 Villa Grande Dr., North Royalton, Ohio 44133

bafarley@firstenergycorp.com

CAREER SUMMARY

Demonstrated track record of building high performance teams that drive profitable revenue growth by generating new business lines and customer relationships. Collaborative leader who operates with a sense of urgency and passion, and motivates teams with a shared vision.

PROFESSIONAL EXPERIENCE

FIRSTENERGY ADVISORS, Akron, Ohio

Vice President, Sales and Operations, December 2019 to Present

Focused on developing a new retail energy business that will advise residential, commercial and industrial customers on how to manage and improve their total energy spend, inform them of energy-related risks and issues, and assist them in procuring the proper products and services to meet their needs. The business is currently in the formative stages which includes:

- Licensing
- Staffing
- Sales and Business Planning

FIRSTENERGY SOLUTIONS, Akron, Ohio

Vice President, Sales and Operations, December 2015 to December 2019

Led the sales and operations for this competitive generation and retail electricity business focusing on residential, commercial and industrial customers acquired primarily through direct and government aggregation sales relationships. Particularly focused on financial metrics, sales, and customer service through cross-functional collaboration between sales team, wholesale operations and retail operations.

- Directly responsible for managing the P&L of the Retail Energy business that spans 9 states and over \$2B in Revenue
- Instrumental in maintaining the value of the retail business and exceeded all operational and customer service measures despite significant headwinds associated with chapter 11 proceedings

Director, Wholesale Transactions, September 2011 to December 2015

Led a team of wholesale originators, traders, and analysts participating in the regional energy, capacity, ancillary, and renewable electricity markets.

- Supported and enabled the growth of a retail and wholesale sales business from 50 TWhrs to over 100 TWhrs of annual sales
- Performed hedging transactions for the generation and retail businesses
- Optimized market offers for a generation fleet with annual generation exceeding 80 TWhrs

FIRSTENERGY CORP, Akron, Ohio

Director, FERC and RTO Policy, August 2005 – September 2011

Developed and led a team which advocated for the formation of wholesale markets and transmission rules that would enable FirstEnergy's move into the competitive generation and retail businesses.

- Actively participated in RTO committees and major FERC policy initiatives. Communicated with company stakeholders to form corporate positions on the various topics and collaborated with external, like-minded stakeholders to advocate our positions
- Led the transition of FirstEnergy's American Transmission System, Inc. (ATSI) from the Midwest ISO into PJM

Wholesale Originator, June 1998 – August 2005

Responsible for performing wholesale bi-lateral transaction in the PJM and MISO markets designed to hedge and optimize the value of the FirstEnergy portfolio.

CLEVELAND ELECTRIC ILLUMINATING CO, Cleveland, Ohio

Industrial Representative, 1989 – June 1998

Utilities single point of contact with industrial end-use customers, managing billing, rates, and service issues. Introduced customers to applications for electric technologies in their facilities.

EDUCATION

Bachelor of Science, Electrical Engineering, Cleveland State University

Masters of Business Administration, Baldwin Wallace College

LORRAINE M. RADER

8587 Northwood Drive, Broadview Hts, OH 44147 | 330.696.2992 | tlrader3@cox.net

SUMMARY

Proven business executive selected to lead various sales organizations within FirstEnergy Corp. from start-up to maturation. Extensive and diverse leadership experience in strategic planning, sales, marketing, community relationships and analytics in both regulated and deregulated electric energy markets. Expertise in sales, relationship building, marketing and workflow management. Excellent communication and organizational skills.

CAREER

FirstEnergy Service Company - Akron, OH

Oct 2019 to
present

FirstEnergy Advisors Director, Energy Sales

Selected to lead and originate start-up operations of a consulting arm of FirstEnergy Corp, FirstEnergy Advisors. Created strategy, hired sales force, applied for licensing, led web-site creation, onboarded partners, signed customers. Continuing to move to market as licensing permits.

FirstEnergy Solutions Corp. - Akron, OH

Apr 2013 to
Oct 2019

Manager, Government Aggregation

- Grew and managed book of over \$2 billion in sales across 450 communities, representing over 1.9 million customers and over 18 TWhs of sales.
- Grew Mass Market passive and targeted sales 0.7 TWh resulting in \$7.6 million of term margin since 2017.
- Developed and implemented web, mail and direct sales' strategies across Ohio and Pennsylvania to grow and renew customers at low cost and high margins, exceeding targeted levels.
- Directly sold electric generation contracts to large and small Ohio aggregation communities.
- Successfully renewed 4.0 TWhs of annual electric generation sales and \$24 million of term margin in 2018 with cities, counties, large consortiums.
- Auto-renewed over 2 TWhs of Mass Market electric generation and \$12 million of term margin since 2016.
- Developed, designed and led policy, process, workflow, system changes, enrollment tracking and contract management for Mass Markets and Government Aggregation.

Dec 2012 to
Apr 2013

Marketing - Manager, Campaign Support

- Manager of start-up reporting department providing targeted lead lists, developing first report of campaign results and supporting external events for residential, commercial and industrial.

May 2011 to
Dec 2012

Mass Marketing - Analyst V

- Lead for managing first long-term product and first \$1,000,000 Sweepstakes campaign for all Ohio and PA EDCs resulting in 30,000 new customers in 3 months of campaigning.
- Recognized Eagle Award winner for obtaining sales at 250% of goal.
- Team lead achieving growth of 350,000 new residential customers in one year at a low cost per acquisition.
- Coordinated 20+ campaigns, all advertising and marketing across 3 EDCs and 2 states.

- Oct 2009 -
May 2011
- The E Group - Advanced Business Analyst**
- Bill Payment Account Manager for largest client of the E Group. Audited over 10,000 contract accounts annually to ensure proper billing and contract set-up of procured energy.
 - Provided daily, weekly, monthly bill analysis, saving customers over \$2.5 million annually. Coordinated payments and advised customers on bill payment strategies designed to save clients money.

ABL Products, Inc. – Brooklyn, OH

- Oct 2009 to
Oct 1997
- Vice President**
- Regularly secured financing and designed pricing strategies to enable purchase of capital equipment at lowest cost to company.
 - Created pricing strategies for new product lines, securing 50% more in sales with new customers and increasing efficiency of quoting process.
 - Managed cash flow, generated payroll and filed associated payroll taxes reducing the need for outside accounting and professional services.
 - Calculated overhead rates and managed cash flow so that current pricing and cash positions were regularly monitored to reduce borrowing and increase profitability.

Centerior Energy Corporation - Independence, OH

- July 1985 to
Jan 1996
- Rates/Forecast Analyst**
- Condensed \$2 billion+ revenue forecasts by 1 month with 25% less staff with accuracy within 0.5% year-end actuals.
 - Developed discounted cash flow and economic research studies for various departments (marketing, engineering, real estate) resulting in \$15 million + savings over a 5-year period.
 - Developed Fuel Tariff reconciliation.
 - Lead Analyst selected to calculate financials of Sale/Leaseback of 2 nuclear plants.

Case Western Reserve University

- Fall 1995
- Adjunct Teaching Professor**
- Designed and taught discounted cash flows and financial analysis at the Masters' level in the Engineering School.

EDUCATION

MBA, Finance and Marketing, Case Western Reserve University, 1990

BA, Economics and English, University of Michigan, 1985

Beta Gamma Sigma Honors Fraternity

Skills: Microsoft Office (Excel, Word, PowerPoint), Peachtree Accounting, CRM, SAP, Qlikview

**Attachment 11a
APPLICATION AFFIDAVIT**

State of Ohio :
 :
County of Summit :
 :

ss.

Bevan Farley, Affiant, being duly sworn according to law, deposes and says that:

He/She is the VP, Sales (Office of Affiant) of Suvon, LLC, d/b/a FirstEnergy Advisors (Name of Applicant);

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

1. That the Applicant herein has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as an electric generation supplier pursuant to 99 Pa. C.S. § 2809(B).
2. That the Applicant herein has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.
3. That the Applicant herein acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.
4. That the Applicant herein acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

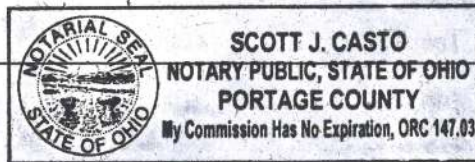
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he expects said Applicant to be able to prove the same at hearing.

B Farley
Signature of Affiant

Sworn and subscribed before me this 16th day of May, 2020.

[Signature]
Signature of official administering oath

My commission expires _____



That Brian Farley, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506, §2807 (C), §2807(D)(2), §2809(B) and the standards and billing practices of 52 PA. Code Chapter 56.

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

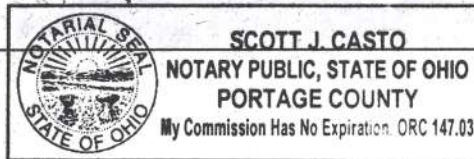
That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.

Brian Farley
Signature of Affiant

Sworn and subscribed before me this 16th day of May, 2020.

[Signature]
Signature of official administering oath

My commission expires _____



Attachment 12
PROOF OF PUBLICATION