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August 4, 2020

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
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-2020-3020377; **PROTEST NUNC PRO TUNC OF RESA TO THE APPLICATION OF SUVON, LLC D/B/A FIRSTENERGY ADVISORS**

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned proceeding is the Protest Nunc Pro Tunc of the Retail Energy Supply Association (RESA) to the Application of Suvon, LLC d/b/a FirstEnergy Advisors at Docket No. A-2020-3020377. Copies of this Protest have been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you should have any questions, please feel free to call me.

Very truly yours,

Todd S. Stewart  
Bryce R. Beard

*Counsel for the Retail Energy Supply Association*

TSS/BRB/das  
Enclosures  
cc: Per Certificate of Service

**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 : Docket No. A-2020-3020377  
Electric Generation Services as a :  
Broker/Marketer to the Public in the :  
Commonwealth of Pennsylvania :

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**PROTEST *NUNC PRO TUNC* OF  
THE RETAIL ENERGY SUPPLY ASSOCIATION  
TO THE APPLICATION OF  
SUVON, LLC D/B/A FIRSTENERGY ADVISORS**

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NOW COMES, the Retail Energy Supply Association (“RESA”)<sup>1</sup>, by and through its attorneys, Hawke McKeon & Sniscak LLP, pursuant to 52 Pa. Code § 5.51, and files this Protest, *nunc pro tunc*, to the 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 (“Application”).<sup>2</sup> RESA submits that FirstEnergy Advisors lacks the technical fitness to maintain the Pennsylvania Public Utility Commission’s (“Commission”) consumer protection and competitive market safeguards and lacks the financial fitness to function without unjust subsidization from its EDC parent FirstEnergy Corporation (“FirstEnergy Corp.”) as proposed in the application which should be denied. In support of its Protest, RESA avers the following:

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<sup>1</sup> The views expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

<sup>2</sup> RESA became aware of the above referenced application on or about July 30, 2020. RESA requests that the Commission allow the consideration of this protest *nunc pro tunc* to address the important consumer protection and competitive safeguard concerns raised in this protest.

## **I. BACKGROUND**

1. On May 21, 2020, Suvon, LLC d/b/a FirstEnergy Advisors (“FirstEnergy Advisors”) filed the above-captioned Application with the Commission seeking approval to offer, render, furnish or supply electricity or electric generation services as a Broker/Marketer to the public in the Commonwealth of Pennsylvania.

2. Notice of FirstEnergy Advisor’s Application was published in various newspapers throughout the Commonwealth between May 24, 2020 and May 29, 2020 as indicated in FirstEnergy Advisor’s proofs of publication notices filed on June 10, 2020 and corrected on June 16, 2020. FirstEnergy Advisor’s publication provided a 15-day deadline to file Protests which concluded on June 15, 2020.

3. RESA became aware of FirstEnergy Advisor’s Application on or about July 30, 2020, after the period 15-day Protest period established by FirstEnergy Advisor’s ended. RESA files this Protest *nunc pro tunc* as expeditiously as possible and requests that the Commission consider the consumer protection and competitive market issues stated herein.

4. RESA requests that the Commission allow its late-filed Protest pursuant to 52 Pa. Code § 1.2(c) as RESA’s Protest raises significant technical and financial fitness concerns of FirstEnergy Advisors Application including both consumer protection and competitive market concerns which, if not addressed, may adversely impact consumers and competitive suppliers alike. As discovery is ongoing by Commission staff in this matter (Commission staff served Data Request Set II on FirstEnergy Advisors on August 3, 2020), allowing RESA’s protest does not adversely affect the substantive rights of FirstEnergy Advisor’s Application.

5. RESA's attorneys, upon whom it is requested that all documents be served, are:

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6. The issues raised in this application have implications for the future state of the competitive energy market in Pennsylvania. RESA has standing as an organization to assert this Protest in this case in the public interest and in furtherance of its organizational goals of promoting fair and competitive energy markets. RESA has a long history of participating in such proceedings before the Commission.

## **II. PROTEST**

7. Pursuant to 66 Pa.C.S. § 332(a), FirstEnergy Advisors bears the burden of proof as to all issues relating to its Application. FirstEnergy Advisors must therefore prove all necessary elements required by the Commission by a preponderance of evidence or its Application must be denied.

8. As more fully described below, RESA believes, and therefore avers, that FirstEnergy Advisors does not possess the necessary technical fitness to warrant approval of the instant Application. FirstEnergy Advisors does not have the necessary technical ability to provide the services as proposed in the Application in a manner compliant with the Commission's consumer protection and competitive market safeguard regulations, and there is no showing that FirstEnergy Advisors is prepared to implement the oversight of marketing as alleged on Section 8 of the Application to ensure all marketing is performed in an ethical manner and in compliance with Commission regulations. Further, FirstEnergy Advisors does not possess

the necessary financial fitness to warrant approval as it has not identified in the application how its operations can function financially separate and without unjust subsidization from its parent EDC FirstEnergy Corp. This raises grave concerns that Commission-regulated EDC service and its ratepayers may be subsidizing an unregulated affiliate EGS operation which could harm both the competitive market and FirstEnergy Corp.'s ratepayers. Indeed, that FirstEnergy Advisors potentially shares offices, employees, and administrative resources with FirstEnergy Corp. presents an issue of unjust subsidization which must be explored.

**A. FirstEnergy Advisors Lacks Technical Fitness As Evidenced by The Application's Experience, Plan, and Structure to Comply with the Commissions' Consumer Protection and Competitive Market Safeguard Regulations.**

9. FirstEnergy Advisors lacks technical fitness because its Application lacks the requisite details on how it intends to ensure compliance with the Commissions regulations. In particular, given the relationship, closeness, shared facilities, and shared workers that FirstEnergy Advisors and FirstEnergy Corporation ("FirstEnergy Corp.") have, the Commission's regulations at 52 Pa. Code § 54.121 – 54.122 raise a heightened concern for the instant application.<sup>3</sup> As discussed below, the Application is unclear that FirstEnergy Advisors and FirstEnergy Corp. will operate in an independent capacity so as to ensure the Commission's consumer protections and competitive market safeguards are upheld during its operations.

10. FirstEnergy Advisors' Application Attachment 8a provides its "experience, plan, and structure." This section lacks any details on how FirstEnergy Advisors intends to Comply with the Commission's Code of Conduct and ethical regulations in team composition and

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<sup>3</sup> While RESA notes that 52 Pa. Code § 54.121 – 54.122 do not govern the content or approval of an application, the potential for misconduct between the EDC FirstEnergy Corp and its new affiliate EGS FirstEnergy Advisors raises grave concerns that the Application does not remotely address. That an EDC and an EGS share common workspace, employees, marketing tactics etc. without any indication in the Application on how the "walls" and oversight will be carried out in the EGSs operations fails to meet technical fitness to comply with the Commission's regulations.

relations with FirstEnergy Corp., with training of sales representatives,<sup>4</sup> or with its business plans for operations within Pennsylvania.

11. FirstEnergy Advisor’s Application statement 8d provides similar scant details on how it intends to oversee its marketing to customers so that it is performed in an ethical and legal manner in compliance with the Commission’s regulations.

12. In particular, 52 Pa. code § 54.122 provides:

**§ 54.122. Code of conduct.**

Electric generation suppliers and electric distribution companies shall comply with the following requirements:

(1) An electric distribution company may not give an electric generation supplier, including without limitation, its affiliate or division, any preference or advantage over any other electric generation supplier in processing a request by a distribution company customer for retail generation supply service.

(2) Subject to customer privacy or confidentiality constraints, an electric distribution company may not give an electric generation supplier, including without limitation its affiliate or division, any preference or advantage in the dissemination or disclosure of customer information and any dissemination or disclosure shall occur at the same time and in an equal and nondiscriminatory manner. “Customer information” means all information pertaining to retail electric customer identity and current and future retail electric customer usage patterns, including appliance usage patterns, service requirements or service facilities.

...

(8) Every electric distribution company and its affiliated or divisional electric generation supplier shall formally adopt and implement these provisions as company policy and shall take appropriate steps to train and instruct its employees in their content and application.

...

(10) An electric distribution company or its affiliate or division may not state or imply that any delivery services provided to an

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<sup>4</sup> While Attachment 8a does state “Sales will also work with regulatory group to make sure that sales work is within the rules and guidelines provided by the Pennsylvania Public Utility Commission,” it does not address the detailed requirements and training required for each of their employees to comply with the Commission’s Code of Conduct regulations.

affiliate or division or customer of either are inherently superior, solely on the basis of their affiliation with the electric distribution company, to those provided to any other electric generation supplier or customer or that the electric distribution company's delivery services are enhanced should supply services be procured from its affiliate or division. When an electric distribution company's affiliated or divisional supplier markets or communicates to the public using the electric distribution company's name or logo, it shall include a disclaimer stating that the affiliated or divisional supplier is not the same company as the electric distribution company, that the prices of the affiliated or divisional supplier are not regulated by the Commission and that a customer is not required to buy electricity or other products from the affiliated or divisional supplier to receive the same quality service from the electric distribution company. When an affiliated or divisional supplier advertises or communicates through radio, television or other electronic medium to the public using the electric distribution company's name or logo, the affiliated or divisional supplier shall include at the conclusion of any communication a disclaimer that includes all of the disclaimers listed in this paragraph.

(11) An electric distribution company which is related as an affiliate or division of an electric generation supplier or transmission supplier (meaning any public utility that owns, operates, or controls facilities used for the transmission of electric energy) which serves any portion of this Commonwealth; and any electric generation supplier which is related as an affiliate or division of any electric distribution company or transmission supplier which serves any portion of this Commonwealth, shall insure that its employees function independently of other related companies.

13. The Application makes no indication how FirstEnergy Corp. and FirstEnergy Advisors intend to comply with § 54.122(1) regarding preference or advantage that an electric distribution company (FirstEnergy Corp.) may not give to an electric generation supplier (FirstEnergy Advisors) over any other electric supplier in processing a request by a distribution company customer for retail generation supply service. Indeed, as expressed below in Section B, all of FirstEnergy Advisors' management, directors, and employees as indicated are either

currently or “formerly”<sup>5</sup> employees of FirstEnergy Corp., providing a basis for concern of both bias and preference in the relationship FirstEnergy Corp has with competitive EGSs.

14. The Application makes no indication how FirstEnergy Corp. and FirstEnergy Advisors intend to comply with § 54.122(2) regarding how customer privacy or confidentiality constraints will be carried out so as to not create any preference or advantage over other electric generation suppliers or brokers. Indeed, as expressed in Section B, the mixed-duty nature of FirstEnergy Corp. and FirstEnergy Advisor’s current and/or former employees raises ethical concerns that the Commission should address.

15. The Application makes no indication how FirstEnergy Corp. and FirstEnergy Advisors intend to comply with § 54.122(8) regarding a formal adoption and implementation of the Commission’s Code of Conduct provisions or the appropriate steps they will take to train and instruct their employees of the Commission’s ethical safeguards.

16. The Application makes no indication how FirstEnergy Corp. and FirstEnergy Advisors intend to comply with § 54.122(10) regarding how either entity shall not state or imply that FirstEnergy Advisors services are inherently superior based on its affiliation with FirstEnergy Corp. The Application is wholly deficient on the Commissions requirement that a disclaimer be made in every format in which FirstEnergy Advisors communicates with customers. Indeed, the Application makes no reference as to how FirstEnergy Advisors intends to market its services to ensure that customers do not feel that they are required to buy electricity from FirstEnergy Advisors which shares its name with FirstEnergy Corp. over the services of other electric generation suppliers in the market.

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<sup>5</sup> As stated in Section B, there is no indication of any change in office or separation between certain FirstEnergy Corp. employees past and current positions.



17. The Application makes no indication how FirstEnergy Corp. and FirstEnergy Advisors intend to comply with § 54.122(11) regarding how its shared employees will function independently of other related companies as discussed below in Section B.

**B. FirstEnergy Advisors Lacks Technical Fitness As Evidenced By Its Operations Management And Professional Resumes To Operate Without Competitive Advantage And Abuse Of Customer Data From FirstEnergy Corp. Which Flouts Consumer Protections and Destroys Competitive Market Safeguards.**

18. FirstEnergy Advisors' Application lacks the requisite details on how it intends to ensure compliance with the Commissions regulations at 52 Pa. Code § 54.122(10-11) regarding how marketing and customer communications will be carried out or how the shared or common employees and management of FirstEnergy Corp. and FirstEnergy Advisors will function independently in order to protect consumer information and the competitive market during its operations.

19. First, the Application makes no indication on how FirstEnergy Advisors intends to alleviate customer confusion regarding the quality of service as it markets using a name shared with the electric distribution company, FirstEnergy Corp. Indeed, it appears that FirstEnergy Advisors intends to take complete advantage of its namesake for marketing and customer capture. As seen in Attachment A to this Protest, FirstEnergy Advisors has marketed via their website to customers in Ohio under the same layout and design of FirstEnergy Corp., seemingly indicating to potential customers a superior quality of service over other EGSs.<sup>6</sup>

20. Second, both FirstEnergy Advisors and FirstEnergy Corp share a single address:

76 South Main Street  
Akron, OH 44308

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<sup>6</sup> RESA notes that FirstEnergy Advisors' website does contain a small font disclaimer regarding the relationship between FirstEnergy Corp. and FirstEnergy Advisors for their currently approved Ohio operations.

21. Upon information and belief, RESA understands that FirstEnergy Advisors and FirstEnergy Corp share a common office. The Application does not indicate how FirstEnergy Advisors and FirstEnergy Corp. intend to ensure independent EDC and EGS operations in compliance with the Commission’s regulations while operating at the same address.

22. Third, every single person identified in FirstEnergy Advisors application is either a current or “former” employee of FirstEnergy Corp as indicated by their email address contacts or by their resumes where attached to the application.<sup>7</sup>

23. That FirstEnergy Advisors’ application is devoid of any indication of how it will operate its separately certificated EGS operations from FirstEnergy Corp.’s EDC operations which raises great concern for both consumer protections and competitive market safeguards which the Commission should address. FirstEnergy Advisors has the burden of proof in this Application and it has not met that burden to prove it is technically fit to comply with the Commission’s regulations.

**C. FirstEnergy Advisors Lacks Financial Fitness as Alleged in its Application because it Fails to Identify How FirstEnergy Advisors Will Operate Financially Separate and Without Unjust Subsidization from its Parent FirstEnergy Corp. which Harms the Competitive Market and Ratepayers.**

24. FirstEnergy Advisors does not possess the necessary financial fitness to warrant approval as it has not identified in the Application at Section 7 how its operations can function financially separate and without unjust subsidization from its parent EDC FirstEnergy Corp. This raises grave concerns that Commission Regulated EDC service and its ratepayers may be subsidizing an unregulated affiliate EGS operation which could harm both the competitive market and FirstEnergy Corp.’s ratepayers.

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<sup>7</sup> See Application Page 1 – Lorraine Rader and Rick Charles for regulatory contact; Page 2 – Lorraine Radar and Lance Bolender for Consumer Service and Complaints; Attachment 8(e) professional resumes of Brian A. Farley, currently FirstEnergy Advisors’ VP, Sales and Operations and previous positions at FirstEnergy Solutions and FirstEnergy Corp and Lorraine M. Rader, currently FirstEnergy Service Company – FirstEnergy Advisor Director, Energy Sales and previous positions at FirstEnergy Corp.

25. As discussed above in Section B, that FirstEnergy Advisors potentially shares offices, employees, and administrative resources with FirstEnergy Corp. presents an issue of unjust subsidization which could harm the competitive market and ratepayers.

**D. Conclusion**

26. There have been and continue to be compelling reasons why RESA raises these substantial concerns over the Application of FirstEnergy Advisors, both for consumer protections and for competitive market safeguards. FirstEnergy Advisors, as the proponent of the Application, has the burden of proving they are technically fit to operate in compliance with the Commissions' regulations. However, given the grave concerns addressed above on the relationship between FirstEnergy Advisors and FirstEnergy Corp., more explanation and vetting of this Application is needed to prove that FirstEnergy Advisors will operate separate from and without advantage from its relationship with FirstEnergy Corp. For the reasons stated above, the Application of FirstEnergy Advisors as submitted to this Commission should be denied and dismissed at the gate until it addresses consumer protection and competitive marketplace safeguards in relation to FirstEnergy Corp.

**WHEREFORE**, for all of the reasons set forth above, RESA respectfully requests that the Application of Suvon, LLC d/b/a FirstEnergy Advisors Docket No. A-2020-3020377 be denied.

Respectfully submitted,



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*Counsel for the Retail Energy  
Supply Association*

DATED: August 4, 2020

# **ATTACHMENT A**

# FirstEnergy Advisors Website Marketing

**FirstEnergy Advisors**

Energy markets are complex and constantly changing – with multi-faceted utility tariffs, hundreds of suppliers, countless product options, fluctuating pricing and a wide range of contract terms and conditions. Pair those realities with a never-ending stream of phone solicitations, and it's understandable that customers can become quickly overwhelmed by trying to decide what's best for their home or business. Many times, customers make no decision at all, and that could be a costly mistake.

The good news is that FirstEnergy Advisors can help. Whether you're looking for the best energy deal for your business, your community or your home, we can help you reach your energy goals. We are independent and impartial when it comes to selecting suppliers, so you end up with the right program and the right product for the lowest price.

✓ **Best Programs** ✓ **Best Prices** ✓ **Best Products**

For any commercial or industrial business, community leader or individual resident who wants a local energy advisor they can trust, FirstEnergy Advisors will recommend the right programs, prices and products to suit your individual needs. With over 100 years of combined experience, our sales team is committed to using our extensive business relationships, regulatory knowledge and energy market analysis to provide you with the professional expertise you need. We're familiar with all aspects of the customer experience, having worked with the utility, suppliers, and agents. We bring that unique experience to the customer as an independent, knowledgeable and trusted advisor.

We're backed by decades of experience saving customers money. Let us put that advantage to work for you.

For more information  
call us at 877-398-5639

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Suwon, LLC, d/b/a FirstEnergy Advisors, is an unregulated subsidiary of FirstEnergy Corp. Suwon, LLC, d/b/a FirstEnergy Advisors, is not the same company as FirstEnergy Corp. The prices of Suwon, LLC, d/b/a FirstEnergy Advisors, products and services are not regulated by the state utility commissions. You do not have to purchase any product and/or service from Suwon, LLC, d/b/a FirstEnergy Advisors, in order to receive the same quality regulated services from FirstEnergy Corp.'s regulated electric utilities – Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company, West Penn Power Company, Pennsylvania Power Company, Metropolitan Edison Company, Jersey Central Power & Light Company, Monongahela Power Company and The Potomac Edison Company.

	<b>Quick Links</b> <a href="#">Our Team</a> <a href="#">FAQs</a>	<b>Contact Us</b> 877-398-5639 <a href="mailto:firstenergyadvisors@firstenergycorp.com">firstenergyadvisors@firstenergycorp.com</a>
	<a href="#">Your Business</a> <a href="#">Your Community</a>	

# FirstEnergy Corp Website Marketing

**Important Information for Customers**

Our commitment to you

Coronavirus Information

My Account | Pay Bill | Report Outage | View Outage | Service Requests

## Our Commitment

We are committed to making customers' lives brighter, the environment better and our communities stronger.

<p><b>Powering a Brighter Future</b> See what motivates Vanessa to keep working hard every day</p>	<p><b>2019 Strategic Plan</b> Read our 5-year strategic plan, "Energized by Possibility"</p>	<p><b>Corporate Responsibility Report</b> Learn how we're delivering energy for a brighter future</p>
<p><b>2019 Annual Report</b></p> <p><b>SOCIAL RESPONSIBILITY</b> <b>TEAMWORK</b> <b>PERFORMANCE</b></p>	<p><b>Return Home Safely</b> Everyone. Every day.</p>	<p><b>FirstEnergy Products &amp; Services</b> We're serving you in new ways</p>

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The banner features three news items with images and titles:

- August 2020**  
Image: Power lines against a blue sky.  
Title: [FirstEnergy's Power Systems Institute Resumes Training for Future Utility Workers](#)  
Label: **News Release**
- July 2020**  
Image: A person working at a control room with multiple monitors.  
Title: [FirstEnergy Meteorologists Help Prepare Utilities for Summer Weather](#)  
Label: **Featured Story**
- July 2020**  
Image: FirstEnergy logo.  
Title: [FirstEnergy Corp. Statement from Chief Executive Officer Charles E. Jones](#)  
Label: **News Release**

[Utilities for Summer Weather](#) | [FirstEnergy Corp. Statement from Chief Executive Officer Charles E. Jones](#) | [FirstEnergy Announces Second Quarter 2020 Financial Results](#) | [FirstEnergy Utilities Preparing for Impact](#)



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#### Connect with us



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the forgoing document upon the persons listed below in accordance with the requirements of § 5.52 (relating to service of a protest).

**VIA ELECTRONIC MAIL**

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Todd S. Stewart  
Bryce R. Beard

Dated: August 4, 2020