



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

Naman Trivedi
 CEO and Co-Founder, WattB, Inc.
 227 Bellevue Way NE #871
 Bellevue, WA 98004-5721
 regulatory@wattb.com
 (408) 582-3432

Docket Number Forthcoming: A-2021-XXX

January 13, 2021

WattB, Inc. d/b/a Wattbuy is pleased to submit an application for an EGS electric broker license from the Pennsylvania PUC. Wattbuy was previously licensed under the PUC via docket number A-2019-3012205, though Wattbuy did not conduct business in Pennsylvania during its licensure. In September 2020, Wattbuy's license was revoked due to a financial security filing error. This application outlines Wattbuy's new business controls, financial and technical fitness, and other procedures implemented to prepare for operation as a broker in the Commonwealth in 2021. Wattbuy sincerely appreciates the Commission's time and correspondence.

The following attachments are included in this application:

Application Section	Document Title	Description	Confidentially filed?
2a	Attachment 1	Fictitious Name filing pursuant to 54 Pa. C.S. §311, Form PA-953.	
2b	Attachment 2	Articles of Conversion and Incorporation (Dept. of State filing)	
2b	Attachment 3-A	Pennsylvania Sales Tax License	
2b	Attachment 3-B	Certificate of Registration	
2b	Attachment 4	Arkansas conversion	
5c	Attachment 5	Regulatory Action description and summary	
5d	Attachment 6	PA Law Review	
7a	Attachment 7	Copy of bond and cover letter	X
7b	Attachment 8-A	Cash Summaries	X
7b	Attachment 8-B	Income Statements	X
7b	Attachment 8-C	Bank Statements	X
7b	Attachment 8-D	Credit Report	X
7b	Attachment 8-E	2018 Tax Return Officer Certified	X
7b	Attachment 8-F	2019 Tax Return Officer Certified	X
7b	Attachment 8-G	Summary of Insurance	X
8a	Attachment 9	Experience, Plan and Structure	
8d	Attachment 10	Code of Conduct	
8d	Attachment 11	Privacy Policy	
8e	Attachment 12	Officer Resumes	
12	Attachment 13	Newspaper publications	
11a	Appendix A	Application Affidavit	
11b	Appendix B	Operations Affidavit	
12	Appendix C	Certificate of Service	
7f	Appendix I	Tax Certification Statement	

Signature: Naman Trivedi

Date: 01/13/2021

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

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

WattB, Inc.
227 Bellevue Way NE, #871
Bellevue, WA 98004-5721
Wattbuy.com
(408) 582-3432

- 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.

CT Corporation System
600 North 2nd Street, Suite 401
Harrisburg, Pennsylvania 17101
Phone Number: 717-234-2300
Fax: 717-238-8232

- 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.

Naman Trivedi
Co-Founder & CEO
227 Bellevue Way NE #871
Bellevue, WA 98004-5721
regulatory@wattb.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.

Jamie Fugitt
101 Morgan Keegan Drive, Suite
A Little Rock, AR 72202
Phone: 501-603-9000
Email: jamie@ppgmrlaw.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:

Ben Hood
CTO
support@wattb.com
227 Bellevue Way NE #871
Bellevue WA 98004-5721
phone: (479) 966-9004
FAX: 1(408) 608-2847

ALTERNATE CONTACT:

Naman Trivedi
Co-Founder & CEO
naman@wattb.com
227 Bellevue Way NE #871
Bellevue WA 98004-5721
Phone: (408) 582-3432
FAX: 1(408) 608-2847

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.

Please see Attachment 1

or

The Applicant will not be using a fictitious name.

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

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

The Applicant is a sole proprietor.

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

or

The Applicant is a:

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

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

or

The Applicant is a:

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

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above. **Please see Attachments 2 for Articles of Conversion and Incorporation, 3-A for PA sales tax license, and 3-B for Certificate of Registration.**
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
Wattbuy is incorporated in Delaware; please see Attachment 2. Wattbuy was previously incorporated in Arkansas; please see Attachment 4 for details.
- Give name and address of officers.

Naman Trivedi, Co-Founder & CEO
227 Bellevue Way NE #871, Bellevue WA 98004-5721

Ben Hood, CTO
227 Bellevue Way NE #871, Bellevue WA 98004-5721

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.

Wattbuy has no affiliates.

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

WattB, Inc. was previously WattB, LLC. WattB, LLC was converted to WattB, Inc. on February 8th 2018. WattB LLC was previously located at 701 Racetrack Road, Benton, AR 72019 and previously had the same web address (<https://wattbuy.com/>). There were no previous predecessors of WattB, Inc.

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.

Wattbuy is an energy intelligence and insights service that allows residents to compare and switch electricity plans in order to save money. Using machine learning to predict electricity usage, our platform provides customers with smart recommendations of electricity suppliers, smart home devices, energy storage, and rooftop solar systems. Our vision is to provide the energy foundation for the connected home.

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.

Wattbuy intends to begin operations in the Commonwealth of Pennsylvania in 2021, likely in Q2 or Q3, pending approval of this license.

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.

WattB, Inc., Wattbuy, nor WattB, LLC have not been involved with criminal or civil proceedings.

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

N/A

- 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.

Wattbuy's singular regulatory action occurred in the Commonwealth of Pennsylvania, stemming from noncompliance with a bond filing requirement. As a result, the Pennsylvania PUC canceled Wattbuy's license. Please see attachment 5 for additional information.

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

Please see Attachment 5 for a full list of resolutions to demonstrate fitness, willingness and ability to properly perform brokerage services in conformance with applicable provisions of the code and lawful Commission orders and regulations. In particular, these actions address prior issues with lawful bond maintenance and communication with the PUC. In brief, Wattbuy has committed to:

- 1) Using a separate e-mail address for regulatory affairs, regulatory@wattb.com, to prioritize PUC communications;***
- 2) Subscribing to docket updates for dockets related to our business, including docket no. A-2019-3012205;***
- 3) Creating and maintaining a Pennsylvania law reference guide (see Attachment 6);***
- 4) Utilizing calendar reminders for important dates, including bond expiration dates; and***
- 5) Reporting extra information to the PUC, as necessary, to demonstrate compliance.***

Wattbuy is open to additional suggestions or feedback from the Commission, though we are confident that these actions will prevent any further issues.

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

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.

Please see Attachment 7

CRITICAL BONDING NOTES:

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

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

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

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

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

Please see Attachments 8-A through 8-H for financial records

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

N/A

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

Wattbuy, as a marketer, earns commissions from retail electricity providers when we provide the retail electricity provider with a qualified customer through our marketplace. The retail electricity provider within 45 days will pay Wattbuy the requisite commission as outlined in the contract with the retail electricity provider.

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.

***Spencer Holt, CPA
Title: Head of Revenue Operations
Address: 227 Bellevue Way NE, #871, Bellevue WA 98004-5721
Phone: (408) 425-8355
Fax: (408) 608-2847
email: spencer@wattb.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.

8. TECHNICAL FITNESS:

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

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

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

Please see Attachment 9

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

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

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

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

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

The first level of marketing oversight is with the digital platforms and the partners we are using. Google Adwords, along with the other digital advertising platforms, have an explicit set of terms of service, and program requirements that Wattbuy must follow in order to continue using their platforms. Within these terms, Wattbuy must agree to not misrepresent the company in ads, as well as agreeing to stringent restrictions on data collection, abuse, dangerous products or services, or dishonest behavior. Secondly, we will follow the oversight of our partnership agreements.

For Wattbuy's Code of Conduct and Privacy Policy, please see Attachment 10 and 11.

- 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.

Wattbuy officers include Naman Trivedi and Ben Hood. Resumes with date ranges and job descriptions may be found in Attachment 12.

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

- Filed an Application with the Federal Energy Regulatory Commission to be a Power Marketer.
- Received approval from FERC to be a Power Marketer at Docket or Case Number_____.
- Not applicable

9. DISCLOSURE STATEMENTS:

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

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

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

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

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

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

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

(Select only one of the following)

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

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

AGREED

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

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

AGREED

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

AGREED

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

ACKNOWLEDGED

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

AGREED

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

AGREED

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

AGREED

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

AGREED

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

AGREED

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

PAYMENT ENCLOSED

11. AFFIDAVITS

Must be notarized before filing.

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

- b. **OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the reliability protocols of the North American Electric Reliability Council, the appropriate regional reliability council(s), and the Commission, and that you agree to comply with the operational requirements of the control area(s) within which you provide retail service. An example copy of this Affidavit can be found at Appendix B.

12. NEWSPAPER PUBLICATIONS

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

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

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

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

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

(Example Publications are provided at Appendices K and L)

13. SIGNATURE

Applicant: _____

By: Naman Trivedi

Title: CEO and Co-Founder

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: WattB, Inc. dba Wattbuy


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

PUC Secretary's Bureau Use

Attachment 1

Entity# : 6953774
Date Filed : 09/26/2019
Pennsylvania Department of State

PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

<input type="checkbox"/> Return document by mail to: Naman Trivedi Name 227 Bellevue Way NE # 871, Address Bellevue PA 98004-5721 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:

<p>1. The fictitious name is: <u>WattBuy</u></p>															
<p>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: <u>WattB, Inc. using the name WattBuy for marketing purposes, is an energy intelligence and insights service that allows residents to compare and switch electricity plans in order to save money. WattB operates as an electricity marketer/broker.</u></p>															
<p>3. The address, including number and street, if any, of the principal place of business (P.O. Box alone is not acceptable):</p> <table border="1"><tr><td>227 Bellevue Way NE # 871,</td><td>Bellevue</td><td>WA</td><td>98004-5721</td><td>Out Of State</td></tr><tr><td>Number and street</td><td>City</td><td>State</td><td>Zip</td><td>County</td></tr></table>	227 Bellevue Way NE # 871,	Bellevue	WA	98004-5721	Out Of State	Number and street	City	State	Zip	County					
227 Bellevue Way NE # 871,	Bellevue	WA	98004-5721	Out Of State											
Number and street	City	State	Zip	County											
<p>4. The name and address, including number and street, if any, of each individual interested in the business is:</p> <table border="1"><thead><tr><th>Name</th><th>Number and Street</th><th>City</th><th>State</th><th>Zip</th></tr></thead><tbody><tr><td>Naman Trivedi</td><td colspan="4">227 Bellevue Way NE # 871 , Bellevue , Out Of State , WA , United States , 98004-5721</td></tr><tr><td>Ben Hood</td><td colspan="4">701 Racetrack Road , Benton , Out Of State , AR , United States , 72019</td></tr></tbody></table>	Name	Number and Street	City	State	Zip	Naman Trivedi	227 Bellevue Way NE # 871 , Bellevue , Out Of State , WA , United States , 98004-5721				Ben Hood	701 Racetrack Road , Benton , Out Of State , AR , United States , 72019			
Name	Number and Street	City	State	Zip											
Naman Trivedi	227 Bellevue Way NE # 871 , Bellevue , Out Of State , WA , United States , 98004-5721														
Ben Hood	701 Racetrack Road , Benton , Out Of State , AR , United States , 72019														

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

WattB, Inc.	Business Corporation	DE
Name	Form of Organization	Organizing Jurisdiction
227 Bellevue Way NE # 871, Bellevue, Out Of State, WA, United States, 98004-5721		
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):

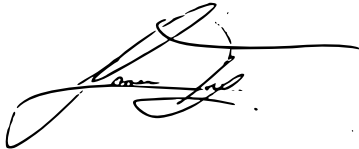
C T Corporation System, 600 North 2nd Street, Suite 401, Harrisburg, Pennsylvania 17101

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

26th day of September, 2019.

Naman Trivedi
Individual Signature

Ben Hood
Individual Signature



1/13/21

WattB, Inc.
Entity Name

Naman Trivedi
Signature

CEO
Title

Attachment 2

Pursuant Application Question 2b

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "WATTB, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE EIGHTH DAY OF FEBRUARY, A.D. 2018.




Jeffrey W. Bullock, Secretary of State

6748902 8300

SR# 20180841223

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 202119249

Date: 02-08-18

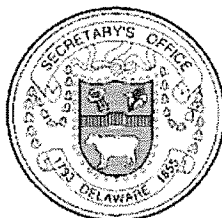
Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CONVERSION OF AN ARKANSAS LIMITED LIABILITY COMPANY UNDER THE NAME OF "WATTB, LLC" TO A DELAWARE CORPORATION, CHANGING ITS NAME FROM "WATTB, LLC" TO "WATTB, INC.", FILED IN THIS OFFICE ON THE EIGHTH DAY OF FEBRUARY, A.D. 2018, AT 1:58 O`CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.




Jeffrey W. Bullock, Secretary of State

6748902 8100F
SR# 20180841223

Authentication: 202119248
Date: 02-08-18

You may verify this certificate online at corp.delaware.gov/authver.shtml

STATE OF DELAWARE
CERTIFICATE OF CONVERSION
FROM A LIMITED LIABILITY COMPANY TO A
CORPORATION PURSUANT TO SECTION 265 OF
THE DELAWARE GENERAL CORPORATION LAW

1. The jurisdiction where the Limited Liability Company first formed is Arkansas.
2. The jurisdiction immediately prior to filing this Certificate is Arkansas.
3. The date the Limited Liability Company first formed is October 16, 2013.
4. The name of the Limited Liability Company immediately prior to filing this Certificate is WattB, LLC.
5. The name of the Corporation as set forth in the Certificate of Incorporation is WattB, Inc.

IN WITNESS WHEREOF, the undersigned being duly authorized to sign on behalf of the converting Limited Liability Company have executed this Certificate on the 8th day of February, 2018.

By: 

Name: Naman Trivedi

Title: Chief Executive Officer

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF INCORPORATION OF "WATTB, INC." FILED IN THIS OFFICE ON THE EIGHTH DAY OF FEBRUARY, A.D. 2018, AT 1:58 O`CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.




Jeffrey W. Bullock, Secretary of State

6748902 8100F
SR# 20180841223

Authentication: 202119248
Date: 02-08-18

You may verify this certificate online at corp.delaware.gov/authver.shtml

CERTIFICATE OF INCORPORATION
OF
WATTB, INC.

(Pursuant to the General Corporation Law of the State of Delaware)

FIRST: The name of this corporation is WattB, Inc. (the "Corporation").

SECOND: The address of the registered office of the Corporation in the State of Delaware is 1209 Orange Street, Wilmington, New Castle County, DE 19801, and the name of the registered agent of the Corporation in the State of Delaware at the address is The Corporation Trust Company.

THIRD: The nature of the business or purposes to be conducted or promoted is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of the State of Delaware (the "General Corporation Law").

FOURTH: The Corporation is authorized to issue two classes of stock to be designated, respectively, "Common Stock" and "Preferred Stock." The total number of shares which the Corporation is authorized to issue is twenty million (20,000,000) shares, (i) fifteen million (15,000,000) shares of which will be Common Stock (the "Common Stock") and (ii) five million (5,000,000) shares of which will be Preferred Stock (the "Preferred Stock"). The Common Stock will have a par value of \$0.0001 per share and the Preferred Stock will have a par value of \$0.0001 per share.

FIFTH: The number of authorized shares of Common Stock may be increased or decreased (but not below the number of shares of Common Stock then-outstanding) by the affirmative vote of the holders of shares of capital stock of the Corporation representing a majority of the votes represented by all outstanding shares of capital stock of the Corporation entitled to vote (voting together as a single class on an as-if-converted basis), and the holders of Common Stock will not be entitled to vote on such matters as a separate class, Irrespective of the provisions of Section 242(b)(2) of the General Corporation Law.

The following is a statement of the designations and powers, privileges, and rights, and the qualifications, limitations, and restrictions thereof, in respect of each class of capital stock of the Corporation.

A. COMMON STOCK

1. General. The voting, dividend, and liquidation rights of the holders of the Common Stock are subject to and qualified by the rights, powers, and preferences of the holders of the Preferred Stock as set out in this Certificate.

2. Voting. The holders of the Common Stock are entitled to one vote for each share of Common Stock held at all meetings of stockholders (and written actions in lieu of meetings); provided, however, that, except as otherwise required by law, holders of Common Stock will not be entitled to vote on any amendment to the Certificate of Incorporation that relates solely to the terms of one or more outstanding series of Preferred Stock if the holders of the affected series are entitled, either separately or together with the holders of one or more other series, to vote on such amendment pursuant to this Certificate or pursuant to the General Corporation Law. There will be no cumulative voting.

B. PREFERRED STOCK

1. General. The powers, privileges, rights, qualifications, limitations, restrictions, and other matters relating to the Preferred Stock will be set out in separate definitive documentation as required by the future issuance of Preferred Stock.

SIXTH: Subject to any additional vote required by this Certificate or the Bylaws, in furtherance and not in limitation of the powers conferred by statute, the Board of Directors is expressly authorized to make, repeal, alter, amend, and rescind any or all of the Bylaws of the Corporation.

SEVENTH: Elections of directors need not be by written ballot.

EIGHTH: Meetings of stockholders may be held within or without the State of Delaware, subject to the terms and conditions of the Bylaws. The books of the Corporation may be kept outside the State of Delaware at such place or places as may be designated from time to time by the Board of Directors or in the Bylaws.

NINTH: To the fullest extent permitted by law, a director of the Corporation will not be personally liable to the Corporation or its stockholders for monetary damages for breach of fiduciary duty as a director. If the General Corporation Law or any other law of the State of Delaware is amended after approval by the stockholders of this Article to authorize corporate action further eliminating or limiting the personal liability of directors, then the liability of a director of the Corporation will be eliminated or limited to the fullest extent permitted by the General Corporation Law as so amended.

Any repeal or modification of the foregoing provisions of this Article by the stockholders will not adversely affect any right or protection of a director of the Corporation existing at the time of, or increase the liability of any director of the Corporation with respect to any acts or omissions of such director occurring prior to, the repeal or modification.

TENTH: To the fullest extent permitted by applicable law, the Corporation is authorized to provide indemnification of (and advancement of expenses to) directors, officers, and agents of the Corporation (and any other persons to which General Corporation Law permits the Corporation to provide indemnification) through Bylaw provisions, agreements with such agents or other persons, vote of stockholders or disinterested directors, or otherwise, in excess of the indemnification and advancement otherwise permitted by Section 145 of the General Corporation Law.

Any amendment, repeal, or modification of the foregoing provisions of this Article will not adversely affect any right or protection of any director, officer, or other agent of the Corporation existing at the time of the amendment, repeal, or modification.

ELEVENTH: The name and mailing address of the incorporator are as follows:

Naman Trivedi
2926 25th Avenue West

Seattle, WA 98199

[Signature on the following page.]

I, Naman Trivedi, for the purpose of forming a corporation under the laws of the State of Delaware, file this Certificate of Incorporation and certify that the facts stated herein are true.

WATTB, INC.

By: 

Name: Naman Trivedi

Title: Incorporator

Date: February 8, 2018



State of Delaware

SECRETARY OF STATE
 DIVISION OF CORPORATIONS
 P.O. BOX 898
 DOVER, DELAWARE 19903

9568104
 PPGMR LAW PLLC
 101 MORGAN KEEGAN SUITE A
 LITTLE ROCK, AR 72202

02-08-2018

ATTN: JAMIE FUGITT

DESCRIPTION	AMOUNT
6748902 - WATTB, INC. 0101J Foreign Entity to Dom Stock Corp	
Conversion Fee	\$115.00
Incorporation Fee	\$15.00
Receiving/Indexing	\$25.00
Surcharge Assessment-New Castle County	\$12.00
Page Assessment-New Castle County	\$54.00
Data Entry Fee	\$10.00
Court Municipality Fee, Wilm.	\$40.00
Expedite Fee, 24 Hour	\$100.00
Expedite Fee, 24 Hour	\$50.00
6748902 - WATTB, INC. 8100 Certified Copy - 1 Copies	
Certification Fee	\$100.00
6748902 - WATTB, INC. Entity Status - Short Form	
Certification Fee	\$50.00
Expedite Fee, 24 Hour	\$40.00
TOTAL CHARGES	\$611.00
TOTAL PAYMENTS	\$611.00
BALANCE	\$0.00

Attachment 3-A

Pursuant Application Question 2b

Envelope ID: BU1008432917

Revenue Id: 1001420255

Page 2 of 6

REV-IS10009 AFP (8-17)

Commonwealth of Pennsylvania Department of Revenue

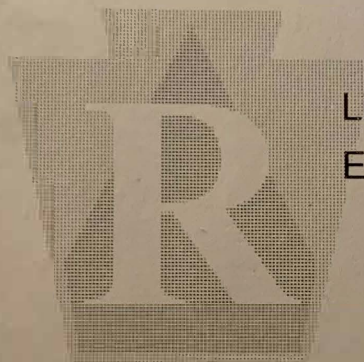
SALES TAX LICENSE

WATTBUY
227 BELLEVUE WAY NE, #871
BELLEVUE WA 98004-5721 USA

Account ID: 67649725

License Type: Retail

Expiration Date: 05/31/2024



pennsylvania
DEPARTMENT OF REVENUE

This license authorizes the holder to collect state and/or local sales, use and hotel occupancy tax. Licenses are issued for tax collection purposes and shall remain in force as specified herein unless sooner surrendered, suspended or revoked.

THIS LICENSE MUST BE PROMINENTLY DISPLAYED.
This license is not assignable or transferable.

Attachment 3-B

Pursuant Application Question 2b

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF STATE

12/23/2020

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

I DO HEREBY CERTIFY THAT,

WattB, Inc

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

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



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

Katly Bookman

Secretary of the Commonwealth

Certification Number: TSC201223151613-1

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

STATE OF ARKANSAS

SECRETARY OF STATE

Mark Martin

ARKANSAS SECRETARY OF STATE

To All to Whom These Presents Shall Come, Greetings:

I, Mark Martin, Arkansas Secretary of State of Arkansas, do hereby certify that the following and hereto attached instrument of writing is a true and perfect copy of

Articles of Conversion

of

WATTB, LLC

(an Arkansas Corporation)

converting to

WATTB, INC.

(a Delaware Corporation)

filed in this office February 22, 2018.



In Testimony Whereof, I have hereunto set my hand and affixed my official Seal. Done at my office in the City of Little Rock, this 19th day of October, 2015.

Mark Martin

Arkansas Secretary of State



Arkansas Secretary of State

Mark Martin

1401 W. Capitol, Suite 250, Little Rock, AR 72201
501-682-3409 • www.sos.arkansas.gov

ARTICLES OF CONVERSION

ACT 408 OF 2009 and Arkansas Code Annotated § 4-32-1202

(PLEASE TYPE OR PRINT CLEARLY IN INK)

The undersigned hereby state:

WattB, LLC

Name of the entity converting from

limited liability company

Type of entity converting from

Arkansas

Jurisdiction

Is converting to: WattB, Inc.

corporation

Type of entity converting to

Name of entity

Delaware

Jurisdiction

- The conversion has been approved as required by Arkansas law; and
- That the conversion has been approved as required by the governing statute of the converted organization; and
- That the converted organization has filed a statement appointing an agent for service of process under § 4-20-112 if the converted organization is a nonfiling or nonqualified foreign entity; and
- That a copy of the plan of conversion is attached or a copy of the plan of conversion is on file at the office located at: 2926 25th Avenue West, Seattle, WA 98199

- And that the effective date of conversion is February 8, 2018.

I understand that knowingly signing a false document with the intent to file with the Arkansas Secretary of State is a Class C misdemeanor and is punishable by a fine up to \$100.00 and/or imprisonment up to 30 days.

Executed this 20th day of February, 2018

Signature of Authorizing Officer

Naman Trivedi, Chief Executive Officer

Authorizing Officer and Title of Officer (Type or Print)

These Articles of Conversion must be filed in conjunction with an initial filing appropriate for the specific converted entity type

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CONVERSION OF AN ARKANSAS LIMITED LIABILITY COMPANY UNDER THE NAME OF "WATTB, LLC" TO A DELAWARE CORPORATION, CHANGING ITS NAME FROM "WATTB, LLC" TO "WATTB, INC.", FILED IN THIS OFFICE ON THE EIGHTH DAY OF FEBRUARY, A.D. 2018, AT 1:58 O`CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.



6748902 8100F
SR# 20180841223

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 202119248
Date: 02-08-18

STATE OF DELAWARE
CERTIFICATE OF CONVERSION
FROM A LIMITED LIABILITY COMPANY TO A
CORPORATION PURSUANT TO SECTION 265 OF
THE DELAWARE GENERAL CORPORATION LAW

1. The jurisdiction where the Limited Liability Company first formed is Arkansas.
2. The jurisdiction immediately prior to filing this Certificate is Arkansas.
3. The date the Limited Liability Company first formed is October 16, 2013.
4. The name of the Limited Liability Company immediately prior to filing this Certificate is WattB, LLC.
5. The name of the Corporation as set forth in the Certificate of Incorporation is WattB, Inc.

IN WITNESS WHEREOF, the undersigned being duly authorized to sign on behalf of the converting Limited Liability Company have executed this Certificate on the 8th day of February, 2018.

By: 

Name: Naman Trivedi

Title: Chief Executive Officer

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "WATTE, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE EIGHTH DAY OF FEBRUARY, A.D. 2018.



6748902 8300

SR# 20180841223

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 202119249

Date: 02-08-18

Delaware

The First State

Page 1

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A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.



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SR# 20180841223

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Jeffrey W. Bullock, Secretary of State

Authentication: 202119248
Date: 02-08-18

CERTIFICATE OF INCORPORATION
OF
WATTB, INC.

(Pursuant to the General Corporation Law of the State of Delaware)

FIRST: The name of this corporation is WattB, Inc. (the "Corporation").

SECOND: The address of the registered office of the Corporation in the State of Delaware is 1209 Orange Street, Wilmington, New Castle County, DE 19801, and the name of the registered agent of the Corporation in the State of Delaware at the address is The Corporation Trust Company.

THIRD: The nature of the business or purposes to be conducted or promoted is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of the State of Delaware (the "General Corporation Law").

FOURTH: The Corporation is authorized to issue two classes of stock to be designated, respectively, "Common Stock" and "Preferred Stock." The total number of shares which the Corporation is authorized to issue is twenty million (20,000,000) shares, (i) fifteen million (15,000,000) shares of which will be Common Stock (the "Common Stock") and (ii) five million (5,000,000) shares of which will be Preferred Stock (the "Preferred Stock"). The Common Stock will have a par value of \$0.0001 per share and the Preferred Stock will have a par value of \$0.0001 per share.

FIFTH: The number of authorized shares of Common Stock may be increased or decreased (but not below the number of shares of Common Stock then-outstanding) by the affirmative vote of the holders of shares of capital stock of the Corporation representing a majority of the votes represented by all outstanding shares of capital stock of the Corporation entitled to vote (voting together as a single class on an as-if-converted basis), and the holders of Common Stock will not be entitled to vote on such matters as a separate class, irrespective of the provisions of Section 242(b)(2) of the General Corporation Law.

The following is a statement of the designations and powers, privileges, and rights, and the qualifications, limitations, and restrictions thereof, in respect of each class of capital stock of the Corporation.

A. COMMON STOCK

1. General. The voting, dividend, and liquidation rights of the holders of the Common Stock are subject to and qualified by the rights, powers, and preferences of the holders of the Preferred Stock as set out in this Certificate.

2. Voting. The holders of the Common Stock are entitled to one vote for each share of Common Stock held at all meetings of stockholders (and written actions in lieu of meetings); provided, however, that, except as otherwise required by law, holders of Common Stock will not be entitled to vote on any amendment to the Certificate of Incorporation that relates solely to the terms of one or more outstanding series of Preferred Stock if the holders of the affected series are entitled, either separately or together with the holders of one or more other series, to vote on such amendment pursuant to this Certificate or pursuant to the General Corporation Law. There will be no cumulative voting.

B. PREFERRED STOCK

1. General. The powers, privileges, rights, qualifications, limitations, restrictions, and other matters relating to the Preferred Stock will be set out in separate definitive documentation as required by the future issuance of Preferred Stock.

SIXTH: Subject to any additional vote required by this Certificate or the Bylaws, in furtherance and not in limitation of the powers conferred by statute, the Board of Directors is expressly authorized to make, repeal, alter, amend, and rescind any or all of the Bylaws of the Corporation.

SEVENTH: Elections of directors need not be by written ballot.

EIGHTH: Meetings of stockholders may be held within or without the State of Delaware, subject to the terms and conditions of the Bylaws. The books of the Corporation may be kept outside the State of Delaware at such place or places as may be designated from time to time by the Board of Directors or in the Bylaws.

NINTH: To the fullest extent permitted by law, a director of the Corporation will not be personally liable to the Corporation or its stockholders for monetary damages for breach of fiduciary duty as a director. If the General Corporation Law or any other law of the State of Delaware is amended after approval by the stockholders of this Article to authorize corporate action further eliminating or limiting the personal liability of directors, then the liability of a director of the Corporation will be eliminated or limited to the fullest extent permitted by the General Corporation Law as so amended.

Any repeal or modification of the foregoing provisions of this Article by the stockholders will not adversely affect any right or protection of a director of the Corporation existing at the time of, or increase the liability of any director of the Corporation with respect to any acts or omissions of such director occurring prior to, the repeal or modification.

TENTH: To the fullest extent permitted by applicable law, the Corporation is authorized to provide indemnification of (and advancement of expenses to) directors, officers, and agents of the Corporation (and any other persons to which General Corporation Law permits the Corporation to provide indemnification) through Bylaw provisions, agreements with such agents or other persons, vote of stockholders or disinterested directors, or otherwise, in excess of the indemnification and advancement otherwise permitted by Section 145 of the General Corporation Law.

Any amendment, repeal, or modification of the foregoing provisions of this Article will not adversely affect any right or protection of any director, officer, or other agent of the Corporation existing at the time of the amendment, repeal, or modification.

ELEVENTH: The name and mailing address of the incorporator are as follows:

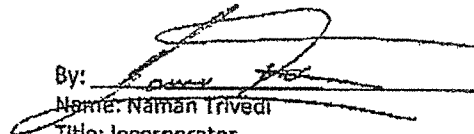
Naman Trivedi
2926 25th Avenue West

Seattle, WA 98199

[Signature on the following page.]

I, Naman Trivedi, for the purpose of forming a corporation under the laws of the State of Delaware, file this Certificate of Incorporation and certify that the facts stated herein are true.

WATTB, INC.

By: 
Name: Naman Trivedi
Title: Incorporator

Date: February 8, 2018

BACKGROUND

On December 5, 2019, the Commission issued WattB, Inc. dba Wattbuy (Wattbuy or WattB) a license to provide electric generation supplier services in the Commonwealth as a broker/marketer in docket no. A-2019-3012205. Wattbuy included in its application a bond effective June 17, 2019 through June 17, 2020 through the Great American Insurance Company. On July 16, 2020, the Pennsylvania PUC issued a tentative order which listed WattB, Inc. as an electric generation supplier that did not provide an original approved financial security instrument. The order gave Wattbuy 45 days to file an updated bond, whereafter the order would be finalized and Wattbuy's license would be canceled. On July 17, 2020, Wattbuy renewed its bond with the Great American Insurance Company. Despite the Commission's directions to file the financial security with the Commission, Wattbuy did not send the updated to the bond because the officers were under the impression that the insurance company would automatically send the renewal to the Commission. Furthermore, Wattbuy's Pennsylvania regulatory e-mails were routed to the CEO of Wattbuy's work e-mail, as Pennsylvania was one of the first states in which Wattbuy applied for licensure. As the business expanded in 2020, this e-mail route proved inefficient for identifying high-priority PUC communication. As such, Pennsylvania PUC notifications and orders were missed by Wattbuy regulatory staff. Wattbuy has identified a solution for this error, explained on the next page.

On September 23, 2020, the Pennsylvania PUC issued a final order which revoked Wattbuy's electric broker license. On September 24 and October 1, Wattbuy filed information confirming that it had complied with Pennsylvania 52 Pa. Code § 54.40 by renewing its bond with Great American Insurance within the proper timeframe, though it did not properly communicate with the PUC. Wattbuy responded to the order by obtaining a new bond with Platte River Insurance Co., bond number PR271858, on September 30, 2020. This bond was mailed overnight to the PUC when received on October 1, 2020. On December 3, 2020, the Pennsylvania PUC issued an Opinion and Order which denied Wattbuy's Petition for Reconsideration because "Ultimately, WattB did not comply with the Commission's requirement to furnish evidence that it adhered to its bonding obligations under Section 2809(c). 66 Pa. C.S. § 2809(c)." Additionally, the Commission noted that, "To be licensed as an EGS and to maintain that license, WattB must demonstrate that it "is fit, willing and able to properly perform the service proposed in conformance with applicable provisions of the code and the lawful Commission orders and regulations... [W]e note that the Company may file a new application with the Commission if it wishes to provide electric generation supplier services as a broker/marketer in Pennsylvania. If WattB or any of its successors does submit an application to provide electric generation supplier services, in any capacity, **it must acknowledge this license cancellation and provide information on what business controls it has in place to ensure compliance with the code and the lawful Commission orders and regulations**" [emphasis added]. Wattbuy describes new business controls on the following page.

Of note, Wattbuy has not yet conducted business in Pennsylvania, but the company aspires to initiate business in 2021. The clerical error made in Pennsylvania was during WattB's first year operating as a licensed but inactive broker in Pennsylvania, and Wattbuy understands that the "Commission does not take lightly an EGS's failure to furnish a bond or other financial security instrument." Wattbuy has taken extensive measures to ensure improved, comprehensive compliance with Pennsylvania law moving forward.

January 12, 2020

The goal of this document is to outline remedies taken in response to Wattbuy's license revocation. These actions were taken, in addition to the traditional application requirements, to demonstrate fitness, willingness and ability to properly perform brokerage services in conformance with applicable provisions of the code and lawful Commission orders and regulations. In particular, these actions address prior issues with lawful bond maintenance and communication with the PUC.

- 1) Wattbuy will reroute all regulatory emails, in Pennsylvania and other jurisdictions, to a distinct company email address in order to prioritize and review regulatory communications. In addition to Naman Trivedi, an extra staff member will monitor this e-mail and coordinate responses. Reflected in Wattbuy's application, this new e-mail address is **regulatory@wattb.com**.
- 2) Through the PUC E-Filing website, Wattbuy will subscribe to docket updates for dockets related to our business, including the legacy docket no. A-2019-3012205, and the present docket when a number is assigned.
- 3) Wattbuy has created a summary of relevant Pennsylvania laws, in addition to highlighted and annotated documents, included as Attachment 6: PA Law Review. As laws are updated, Wattbuy will follow up with the PUC to demonstrate awareness of the most recent regulations governing our business operations.
- 4) Wattbuy will create calendar updates reflecting reminders for bond and/or license expiration dates. Currently, the Wattbuy calendar reflects the expiration of our current active bond in September 2021; a reminder four months prior; and an additional reminder one month prior.
- 5) Wattbuy is willing to submit quarterly reports to the PUC in order to demonstrate compliance and dedication to improvement. Of note, during the pendency of Wattbuy's previous license, the company did not provide brokerage services in Pennsylvania. Additional reporting to the Commission could provide information on WattB's new business operations and other details, providing that this does not create undue burden on PUC staff.

If Commissioners or staff have any additional requests, suggestions, or concerns with the actions outlined here, please let us know. Wattbuy is willing to go above typical requirements, as appropriate, to demonstrate fitness to operate in the Commonwealth of Pennsylvania.



Attachment 6

*Pennsylvania law review
Pursuant Application Question 5d*

In order to ensure proper compliance with Pennsylvania law, WattB, Inc. staff created this briefing document with references and links to rules and codes related to brokers. The interpretive and abbreviated text in this document was designed to provide an indexed overview of relevant law and requirements. Notably, this list is not comprehensive, as any business operating in the state of Pennsylvania is subject to all laws and regulations. This document is not designed to provide legal advice, but instead will serve as a reference guide to common topics, requirements, and laws. In some cases (i.e. formal proceedings and billing practices), relevant law is reviewed at a high level and listed purely as an index. Hyperlinks are provided in the digital version of this file.

Bookmarked Regulations:

License Application Requirements/Notes

[License Maintenance Procedures](#)

2016 Pennsylvania Consolidated Statutes

[Title 66 - PUBLIC UTILITIES, Chapter 28: Restructuring of Electric Utility Industry](#)

Pennsylvania Code

[Title 52, Chapter 1: Rules of Administrative Practice and Procedure](#)

[Title 52, Chapter 5: Formal Proceedings](#)

[Title 52, Chapter 54: Electricity Generation and Customer Choice.](#)

[Title 52, Chapter 56: Standards and Billing Practices for Residential Public Utility Service.](#)

License Maintenance Procedures

(according to the EGS application, and reflected via other law/regulations)

Initial and Ongoing Fees

- \$350 Filing Fee with Application by certified check or money order
- \$350 Filing Fee for any amendments or changes to an existing license
- An Annual Fee of \$350 to maintain license
- Annual supplemental fee based on annual gross intrastate revenues (not applicable to brokers and marketers).

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.

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).

Title 66 - PUBLIC UTILITIES, Chapter 28: Restructuring of Electric Utility Industry

Chapter 28 was added by the legislature on December 3, 1996, P.L.802, No.138, effective January 1, 1997. This chapter was titled the Electricity Generation Customer Choice and Competition Act. The Act addresses various aspects of implementing electric deregulation, though only sections 2803 and 2809 primarily impact brokers.

Pennsylvania General Assembly, Title 66 Pa. C.S. § 2803

§ 2803. Definitions.

- The definition of Electric Generation supplier includes brokers and marketers: A person or corporation, including municipal corporations which choose to provide service outside their municipal limits except to the extent provided prior to the effective date of this chapter, brokers and marketers, aggregators or any other entities, that sells to end-use customers electricity or related services utilizing the jurisdictional transmission or distribution facilities of an electric distribution company or that purchases, brokers, arranges or markets electricity or related services for sale to end-use customers utilizing the jurisdictional transmission and distribution facilities of an electric distribution company. The term excludes building or facility owner/operators that manage the internal distribution system serving such building or facility and that supply electric power and other related power services to occupants of the building or facility. The term excludes electric cooperative corporations except as provided in 15 Pa.C.S. Ch. 74

Pennsylvania General Assembly, Title 66 Pa. C.S § 2809

§ 2809. Requirements for electric generation suppliers.

- Person/ corporations must possess a license, received via an application process. Licenses must be accompanied by oath or affirmation
- A license shall be issued to any qualified applicant, authorizing the whole or any part of the service covered by the application, if it is found that the applicant is fit, willing and able to perform properly the services proposed and to conform to the provisions of this title and the lawful orders and regulations of the commission under this title, including the commission's regulations regarding standards and billing practices, and that the proposed service, to the extent authorized by the license, will be consistent with the public interest and the policy declared in this chapter
- Licensees are required to maintain a form of financial responsibility, such as a bond or other security; pay taxes in accordance to Articles II and XI of the Tax Reform Code of 1971 and other codes; provide an address of the participant's principal office or registered agent in the Commonwealth;
- Unpaid taxes are subject to taxes
- Licenses may not be transferred without Commission approval
- The Commission may modifying licensing requirements from electric generation suppliers to support competition
- Prior to approving the licensure of any broker and marketer or aggregator, the commission shall set forth standards to ensure that all retail customer classes may choose to purchase electricity through a broker and marketer or aggregator. The commission shall also ensure that brokers, marketers and aggregators comply with 52 Pa. Code Ch. 56.
- The Commission may establish annual fees related to the oversight of generation suppliers.

Title 52, Chapter 1. Rules of Administrative Practice and Procedure.

Chapter 1 of Title 52 outlines the requirements for application filing, Commission hours, general information, jurisdictional authority, rule amendments, and other structures of Commission administrative procedures.

Subchapter A. General Provisions.

§ 1.1. Scope of subpart.

- This section governs the practice and procedure before the commission, intended to supersede the applicability of 1 Pa. Code Part II relating to general rules of administrative practice and procedure.

§ 1.2. Liberal construction.

- Reviews jurisdiction, appeals, discretion, procedure, and general rules regarding language.

§ 1.3. Information and special instructions.

- First-class mail should be sent to: Pennsylvania Public Utility Commission Post Office Box 3265 Harrisburg, Pennsylvania 17105-3265
- In-person or other mail should be sent to:
- Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, Pennsylvania 17120

§ 1.4. Filing generally.

- Submittals, pleadings, and other document should be sent to: Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, Pennsylvania 17120
- Electronic filing on the Commission's electronic filing system may be used if the document is a qualified document
- Submittals must include the docket number or similar identifying symbols, and the Commission must establish a short title.
- The identity of the filing party must be clear (i.e. address, name, status, etc.) along with additional instructions for communication beyond first-class mail
- If filings do not comply with this subpart or title, the Commission may decline the document or return it unfiled.
- Redundant, immaterial, impertinent, or scandalous material may be stricken

§ 1.5. Amendment to rules.

- Petitions for rule modifications may be filed

§ 1.6. Commission office hours.

- Unless otherwise directed by the Governor, the Commission offices will be open from 8 a.m. until 4:30 p.m. on business days except Saturdays, Sundays and legal holidays.
- Hours have been temporarily modified by the COVID-19 pandemic.

§ 1.7. Sessions of the Commission.

- Public meetings of the Commission ordinarily will be held in its offices in the Commonwealth Keystone Building, Harrisburg. Schedules for public meetings can be obtained from the Commission Secretary or viewed on the Commission's website.

§ 1.8. Definitions.

- Definitions listed pertain to filing, electronic, administrative, proceeding, and document terms.

Subchapter B. Time

§ 1.11. Date of filing.

- Whenever a pleading, submittal or other document is required or permitted to be filed under this title or by statute, it will be deemed to be filed on one of the following dates:
 - (1) On the date actually received in the office of the Secretary.
 - (2) On the date deposited with an overnight express delivery service as shown on the express delivery receipt attached to or included within the envelope containing the document.
 - (3) On the date deposited in the United States Mail as shown by the United States Postal Service stamp on the envelope or noted on a United States Postal Service Form 3817 certificate of mailing. A mailing envelope stamped by an in-house postage meter is insufficient proof of the date of mailing.
 - (4) On the date stated on the confirmation of receipt from the Commission’s electronic filing system, when the time shown is prior to 4:30 p.m. local prevailing time in the Eastern Time Zone (United States of America) and the date shown is a day on which the Commission offices are open. When a document is filed electronically when the offices of the Commission are closed, the document will be deemed to be filed at the time the offices next open.
- Failure to include a legible delivery receipt with a document submitted in accordance with the methods specified in subsection (a)(2) or (3) may result in an untimely filing.

§ 1.12. Computation of time.

- Addresses the “computing time” used by the Commission to rule upon a given document

§ 1.13. Issuance of Commission orders.

- An order will not be made public prior to its entry except where, in the Commission’s judgment, the public interest so requires. The date of entry of an order may or may not be the day of its adoption by the Commission. The Secretary will clearly indicate on each order the date of its adoption by the Commission and the date of its entry.
- The date of entry of an order which is subject to review by Commonwealth Court is governed by Pa.R.A.P. No. 108. The date of issuance of any other order shall be deemed to be the date of entry

§ 1.14. Effective dates of Commission orders.

- Unless otherwise dictated in the Commission order, an order of the Commission promulgating regulations shall be effective upon publication in the Pennsylvania Bulletin

§ 1.15. Extensions of time and continuances.

- Except when otherwise prevented by statute, the time fixed or period of time prescribed may be extended by the Commission. A motion must be filed before the expiration of the period originally prescribed.aa
- Requests for extension of time must be filed at least 5 days before the time fixed for filing the briefs allows a shorter time
- Motions must contain facts which support the extension

§ 1.16. Issuance of decisions by presiding officers.

- The date of issuance shall be the date which is posted on the Commission’s electronic filing system.
- The Secretary will mail a decision to parties who are not filing users

Subchapter C. Representation Before The Commission

§ 1.21. Appearance.

- Individuals may represent themselves, or in adversarial proceedings may be represented by attorneys or legal interns
- In nonadversarial proceedings, persons may be represented by partners; a bona fide officer; an officer or employee of an agency
- In informal proceedings, parties may be represented by a paralegal working under supervision of an attorney; an appropriate individual including a family member or other entity with oral or written authority

§ 1.22. Appearance by attorney or certified legal intern.

- Subject to § 1.21(a) (relating to appearance), an attorney at law admitted to practice before the Supreme Court of Pennsylvania shall represent persons in Commission proceedings.
- An attorney not licensed in this Commonwealth may appear before the Commission in accordance with the Pennsylvania Bar Admission Rules.
- Law students may appear if in compliance with other rules

§ 1.23. Other representation prohibited at hearings.

- Persons may not be represented by entities other than those listed above

§ 1.24. Notice of appearance or withdrawal.

- Describes how different entities, including individuals or attorneys, should file notices or other documentation to appear in the proceeding

§ 1.25. Form of notice of appearance.

- The form of notice of appearance must follow a consistent format, listed in this section

§ 1.26. Contemptuous conduct.

- Contemptuous content at a hearing shall be grounds for exclusion from the hearing and for summary suspension without a hearing

§ 1.27. Suspension and disbarment.

- The Commission may deny, temporarily or permanently, the privilege of appearing or practicing before it in any way to a person who is found by the Commission, after notice and opportunity for hearing in the matter, to have failed to follow commission rules (see section for specifics)

Subchapter D. Documentary Filings

§ 1.31. Requirements for documentary filings.

- Describes various requirements for filings

§ 1.32. Filing specifications.

- Describes different types of filings and associated requirements, including revocations

§ 1.33. Incorporation by reference.

- Documents on file with the Commission may be incorporated by reference into a subsequent pleading, submittal or other document. A docket number and document title must be included
- Documents over 20 years old may not be incorporated unless the document is readily available in the active records of the Commission

§ 1.34. *Single pleading or submittal covering more than one matter.*

- Describes how a multiple related transactions may be accepted as a single filing for purposes of calculating fees

§ 1.35. *Execution.*

- Describes requirements for signatures, signatory parties, effect of signatures, etc.

§ 1.36. *Verification.*

- Applications, petitions, formal complaints, motions and answers thereto containing an averment of fact not appearing of record in the action or containing a denial of fact must be personally verified by a party thereto or by an authorized officer or other authorized employee of the party if a corporation or association
- Verifications must be submitted by the filing user electronically
- The docket number must be clearly indicated on the original verification
- See section for the detailed, provided form

§ 1.37. *Number of copies.*

- Paper filings must have a hard copy, an original, and cover letter, except for certain exclusions
- Electronic filings under 250 pages may be submitted electronically. Does not need a paper copy.
- If exceeding 250 pages but does not exceed 10 megabytes, the user may file one copy and also file the original in paper form

§ 1.38. *Rejection of filings.*

- The commission may reject any filing if it does not comply with any applicable statute, regulation, or order of the Commission

Subchapter E. Fees.

§ 1.41. *Filing fees.*

- Filings will not be made official until fees have been paid

§ 1.42. *Mode of payment of fees.*

- Fees shall be paid by money order or check made payable to the Commonwealth of Pennsylvania, by electronic payment using the Commission's filing system or other method currently acceptable to the Commission

§ 1.43. *Schedule of fees payable to the Commission.*

- See full schedule for all fees. An application requires a \$350 payment.

Subchapter F. Service of Documents.

§ 1.51. *Instructions for service, notice and protest.*

- The Secretary will respond to the applicant or petitioner upon receipt of the application.
- A service list must be filed which includes the names and addresses of the parties and whether the parties agree to receive electronic service

§ 1.52. *[Reserved].*

§ 1.53. Service by the Commission.

- This section applies to service of an order, notice or other document originating with the Commission and other documents designated by the Commission, except when the Commission specifically requires a different form of service.

§ 1.54. Service by a party.

- Pleadings, submittals, briefs and other documents, filed in proceedings pending before the Commission shall be served upon parties in the proceeding and upon the presiding officer, if one has been assigned.
- Service may be made by first class mail, personal, electronic, or telefacsimile

§ 1.55. Service on attorneys.

- When an attorney enters an appearance under § 1.24 (relating to notices of appearances or withdrawals), service must be directed to the attorney in the same manner as prescribed for his client.
- When a party is represented by an attorney, service upon the attorney shall be deemed service upon the party. Separate service on the party may be omitted.

§ 1.56. Date of service.

- The date of service shall be the earliest day when the document served meets one of the following conditions: (1) The document is deposited in the United States mail; (2) The document is deposited with an overnight express package delivery service; (3) The document is delivered in person.
- Telefacsimile must be provided prior to 4:30 P.M. local prevailing time
- Unless otherwise prescribed, whenever the party is required to do an act within a prescribed period and the document is served by U.S. first-class mail, 3 days shall be added to the prescribed period

§ 1.57. Proof of service.

- Paper and electronic filings must contain certificate of services

§ 1.58. Form of certificate of service.

- See section for direct language relating to certificate of service

§ 1.59. Number of copies to be served.

- One copy of a document shall be served on the presiding officer if one has been designated. Otherwise, see section for additional provisions

Subchapter G. Matters Before Other Tribunals.

§ 1.61. Notice and filing of copies of pleadings before other tribunals.

- Addresses matters which appear in regulatory bodies beyond the Commission
- Bankruptcy is also governed by this section, and utility or licensee must file a copy of the petition with the Commission
- Abandonment of service must also be filed with the Commission

§ 1.62. Filing and record of securities certificate in bankruptcy proceedings.

- After final approval of a plan by the bankruptcy court, but before issuing or changing the terms and conditions of securities, the debtor or its successor shall file with the Commission a securities certificate in respect to the issuance or change. Development of a record in the proceeding, however, may be

unnecessary, if the petition contains a stipulation that the record in a previous proceeding relating to the plan may be considered by the Commission in passing upon the securities certificate.

Subchapter H. Public Access to Commission Records.

§ 1.71. Statement of objectives.

- The Commission's records maintenance system is intended to provide for the greatest degree of public access to Commission documents that is consistent with the exercise of the functions of the Commission under the act and other applicable laws. The Commission's system is designed to meet that objective and to give public notice of which classes of documents are available for inspection. The system provides a predictable standard, which nevertheless permits the Commission to take cognizance of the circumstances of individual requests for documents which may militate in favor of or against disclosure.
- See other sections for additional details.

1.72. Content review of formal case files.

1.73. Fiscal records.

1.74. Disclosure of other documents.

1.75. Review of staff determination.

1.76. Tariffs, minutes of the public meetings and annual reports.

1.77. Extensions of time to review folders.

Subchapter I. Amendments or Withdrawals of Submittals

§ 1.81. Amendments.

- An amendment to a submittal or pleading may be tendered for filing at any time and will be deemed filed in accordance with § 1.11 (relating to date of filing) unless the Commission otherwise orders.

§ 1.82. Withdrawal or termination.

- A party that wishes to terminate an uncontested matter or proceeding before a final decision may file a petition for leave to withdraw the appropriate document. If no one responds within 10 days of service, the matter may be stricken by the Commission or presiding officer

Subchapter J. Docket.

§ 1.86. Docket.

- The Secretary will maintain a docket of all proceedings, and each proceeding as initiated will be assigned an appropriate designation.

Subchapter K. Waiver of Rules.

§ 1.91. Applications for waiver of formal requirements.

- A request for waiver or, or exception to, any provision of this chapter may be filed. The request must show the nature of the waiver desired and set forth the reasons for support.
- Unless the Commission expressly orders, acceptance for filing will not waive a failure to comply with this title or other applicable requirements, and the failure may be cause for striking all or any part of the filings

Subchapter L. Unofficial Statements and Opinions

§ 1.96. Unofficial statements and opinions by Commission personnel.

- Statements made by Commission staff and other related parties do not have the force and effect of law or legal determinations and are not binding upon the Commonwealth or the Commission

Chapter 5: Formal Proceedings

The content of this chapter governs the procedures followed in formal proceedings. It is expected that Wattbuy will only engage in its license application proceeding, which will likely not involve many of the matters contained in this code. For this reason, the regulations in this chapter are indexed here for reference as needed. Wattbuy will nonetheless comply with all provisions of this chapter.

Subchapter A. Pleadings and Other Preliminary Matters

GENERAL PROVISIONS

5.1. Pleadings allowed.

APPLICATIONS

5.11. Applications generally.

5.12. Contents of applications.

5.13. Applications for construction or alteration of crossings.

5.14. Applications requiring notice.

FORMAL COMPLAINTS

5.21. Formal complaints generally.

5.22. Content of formal complaint.

5.23. Joinder of formal complaints.

5.24. Satisfaction of formal complaints.

5.31. Staff-initiated complaints.

5.32. Complaints in rate proceedings.

PETITIONS

5.41. Petitions generally.

5.42. Petitions for declaratory orders.

5.43. Petitions for issuance, amendment, repeal or waiver of Commission regulations.

5.44. Petitions for reconsideration from actions of the staff.

PROTESTS

5.51. Protest to an application.

5.52. Content of a protest to an application.

5.53. Time of filing.

5.54. [Reserved].

ANSWERS

5.61. Answers to complaints, petitions, motions and preliminary objections.

5.62. Answers seeking affirmative relief or raising new matter.

5.63. Replies to answers seeking affirmative relief or new matter.

5.64. [Reserved].

5.65. Answers to amendments of pleadings.

5.66. Answers to petitions to intervene.

INTERVENTION

5.71. Initiation of intervention.

5.72. Eligibility to intervene.

5.73. Form and content of petitions to intervene.

5.74. Filing of petitions to intervene.

5.75. Notice, service and action on petitions to intervene.

5.76. Limitation of participation in hearings.

CONSOLIDATION

5.81. Consolidation.

AMENDMENT AND WITHDRAWAL OF PLEADINGS

- 5.91. Amendments of pleadings generally.**
- 5.92. Amendments to conform to the evidence.**
- 5.93. Directed amendments.**
- 5.94. Withdrawal of pleadings in a contested proceeding.**

PRELIMINARY OBJECTIONS

- 5.101. Preliminary objections.**
- 5.102. Motions for summary judgment and judgment on the pleadings.**
- 5.103. Motions**

Subchapter B. Hearings.

GENERAL

- 5.201. Notice of proceeding; hearing; waiver of hearing.**
- 5.202. Scheduling of hearing.**
- 5.203. Hearing in rate proceedings.**

NOTICE OF HEARING

- 5.211. Notice of rulemaking proceedings.**
- 5.212. Notice of nonrulemaking proceedings.**

PREHEARING AND OTHER CONFERENCES

- 5.221. Conferences to adjust, settle or expedite proceedings.**
- 5.222. Initiation of prehearing conferences in nonrate proceedings.**
- 5.223. Authority of presiding officer at conferences.**
- 5.224. Prehearing conference in rate proceedings.**

SETTLEMENT AND STIPULATIONS

- 5.231. Offers of settlement.**
- 5.232. Stipulations and settlement petitions.**
- 5.233. Refusal to make admissions or stipulate.**
- 5.234. Presentation and effect of stipulations.**
- 5.235. Restrictive amendments to applications for motor carrier of passenger authority.**

HEARINGS

- 5.242. Order of procedure.**
- 5.243. Presentation by participants.**
- 5.244. [Reserved].**
- 5.245. Failure to appear, proceed or maintain order in proceedings.**

TRANSCRIPT

- 5.251. Recording of proceedings**
- 5.252. Review of Testimony**
- 5.253. Transcript corrections.**
- 5.254. Copies of transcripts.**

Subchapter C. Interlocutory Review.

- 5.301. Interlocutory review generally.**
- 5.302. Petition for interlocutory Commission review and answer to a material question**
- 5.303. Commission action on petition for interlocutory review and answer.**
- 5.304. Interlocutory review of discovery matters.**
- 5.305. Interlocutory review of a material question submitted by a presiding officer.**

5.306. Notification by telephone.

Subchapter D. Discovery.

5.301. Interlocutory review generally.

5.302. Petition for interlocutory Commission review and answer to a material question.

5.303. Commission action on petition for interlocutory review and answer.

5.304. Interlocutory review of discovery matters.

5.305. Interlocutory review of a material question submitted by a presiding officer.

5.306. Notification by telephone.

Subchapter E. Evidence and Witnesses.

EVIDENCE

Sec.5.401. Admissibility of evidence.

5.402. Admission of evidence.

5.403. Control of receipt of evidence.

5.404. Additional evidence.

5.405. Effect of pleadings.

5.406. Public documents.

5.407. Records of other proceedings.

5.408. Official and judicial notice of fact.

5.409. Copies and form of documentary evidence.

WITNESSES

5.411. Oral examination.

5.412. Written testimony.

5.412a. Electronic submission of pre-served testimony.

5.413. [Reserved].

5.414. Offers of proof.

SUBPOENAS

5.421. Subpoenas.

5.423. [Reserved].

5.424. Issuance of subpoenas.

CLOSE OF THE RECORD

5.431. Close of the record.

Subchapter F. Presiding Officers.

5.481. Designation of presiding officers.

5.482. Disqualification of a presiding officer.

5.483. Authority of presiding officer.

5.484. Restrictions on duties and activities.

5.485. Manner of conduct of hearings.

5.486. Unavailability of presiding officer.

Subchapter G. Briefs.

5.501. Content and form of briefs.

5.502. Filing and service of briefs.

Subchapter H. Exceptions, Appeals, and Oral Argument

5.531. Certification of record without decision.

5.532. Oral argument before presiding officer.

5.533. Procedure to except to initial, tentative and recommended decisions.

5.534. [Reserved].

- 5.535. Replies.**
- 5.536. Effect of failure to file exceptions.**
- 5.537. Rate case settlements.**
- 5.538. Oral argument before the Commission.**
- 5.539. Withdrawal of appeals.**

Subchapter I. Reopening, Reconsideration and Rehearing.

- 5.571. Reopening prior to a final decision.**
- 5.572. Petitions for relief following a final decision.**

Subchapter J. Reports of Compliance.

- 5.591. Reports of compliance.**
- 5.592. Compliance with orders prescribing rates.**

Subchapter K. Appeals to Court.

- 5.631. Notice of taking appeal.**
- 5.632. Preparation and certification of records.**
- 5.633. Certification of interlocutory orders**

Chapter 54 - Electricity Generation and Customer Choice.

Subchapter A: Customer Information. [52 Pa. Code § 54.1 – 54.10](#)

This section of code addresses customer information and transparency requirements, including standards and pricing practices, bill formats, disclosure statements, requests for information about generation supply, marketing/sales activity, customer privacy, complaint handling process, and notice of contract expirations.

§ 54.1. Purpose.

- The purpose of this subchapter is to require that electricity providers enable customers to make informed choices regarding the purchase of electricity services offered by providing adequate and accurate customer information. Information shall be provided to customers in an understandable format that enables customers to compare prices and services on a uniform basis.

§ 54.2. Definitions.

- WattB, Inc. qualifies as a broker or marketer in Pennsylvania. Brokers also are included in the definition of Electric Generation Supplier (EGS), and all relevant laws referencing EGSs will apply to brokers unless otherwise noted.

§ 54.3. Standards and pricing practices for retail electricity service.

- EDCs and EGSs must provide consistent information, including references to terms at www.PaPowerswitch.com or other successor media platform as determined by the Commission.
 - The PUC's [Consumer Rights and Responsibilities](#) document summarizes relevant instructions, definitions, etc.

§ 54.4. Bill format for residential and small business customers.

- EGSs have a responsibility to provide a consistent bill format with clear charge differentiation. While Wattbuy will not create or implement these charges, Wattbuy has a responsibility to ensure that partner suppliers are displaying information in a clear manner.

§ 54.5. Disclosure statement for residential and small business customers.

- EGSs must provide disclosure statements which describe terms of service, conditions, billing formats (price per-kWh, generation charges, introductory prices, price variability limits, etc.).
- Customers must be given information on when and how the customer will receive notification of price. Special conditions apply to billing requirements depending on whether the price is present at time of billing; if the price changes based on actual customer usage; if the price is a fixed monthly amount; or if the price varies when the customer actually uses electricity.
- Variable pricing customers must be informed that historical pricing is not indicative of present or future pricing
- Various requirements for notifications, terminations, and other contract modifications apply
- Regarding customer information, “
- If the EGS intends on obtaining customer account information from the EDC, the EGS shall inform the customer of the specific type of information that may be obtained, such as usage data, the purpose for obtaining this information and that the customer is consenting to the EDC releasing this information by entering into this contract. The EGS shall also inform the customer that the EGS will maintain the confidentiality of a customer's personal information including the customer's name, address, telephone number, electric usage and historic payment information, as required by applicable Commission regulations and Federal and State laws.

§ 54.6. Request for information about generation supply.

- EGSs must respond to consumer requests regarding generation energy sources, including information filed in the annual licensing reports required by the Commission
- The Commission supports the application of the Federal Trade Commission's [Guides for the Use of Environmental Marketing Claims](#) (16 CFR 260.1-260.8, relating to guides for the use of environmental marketing claims)
- Generation which was marketed as “produced in Pennsylvania” or “environmentally friendly” must have information to support their claim. These claims may not be overstated.
- The use of general, unsubstantiated and unqualified claims of environmental benefits, such as “green” and “environmentally friendly,” is prohibited.
- Historical billing data must be updated with each billing cycle and conveyed in terms of kWh and kW

§ 54.7. Marketing/sales activities.

- Advertised prices must reflect prices in disclosure statements and billed prices.
- Unit prices based on actual customer usage must reflect average price per kWh for usages of 500, 1,000 and 2,000 kWh in a table format. Prices must include all costs associated with the rate charged, including fees. Introductory prices may be included in separate tables.
- Fixed prices must also reflect average prices per kWh for usages of 500, 1,000 and 2,000 kWh in a table format.
- Tables must reflect an effective date
- Advertising materials targeted for residential and small business sales shall be made available upon request of the Commission in the event of a formal or informal complaint or investigation.

§ 54.8. Privacy of customer information.

- An EDC or EGS may not release private customer information to a third party unless the customer has been notified of the intent and has been given a convenient method of notifying the entity of the customer's desire to restrict the release of the private information. Specifically, a customer may restrict the release of their telephone number or historical billing data.
- Customers may implement this restriction via a signed form, orally or electronically.
- This does not impact utilities' other obligations to provide electricity service as specified in the code and disclosure statement.

§ 54.9. Complaint handling process.

- Customers must be informed of the following procedures for complaint resolution.
- Residential and small business customers must first contact the party responsible for the service in question. If the customer contacts the wrong entity, the customer will promptly be referred to the appropriate contact. In the event of a power outage, the customer will be referred to the EDC.
- Complaints that pertain to Chapter 56 (relating to standards and billing practices for residential utility service) matters shall be handled and resolved in accordance with the applicable standards in Chapter 56.
- EDCs and EGSs will provide the Commission access to disclosure statements, billing and other customer information resources for compliance reviews as deemed necessary by the commission.
- If a complaint is brought before the Commission, the EGS obligation shall be extended to the provision of pricing information.

§ 54.10. Notice of contract expiration or change in terms for residential and small business customers.

- This section governs contract changes and expirations, including notices, required information, follow-up options, cancellation fees, new pricing offers, conversion to month-to-month contracts, communication via mail or electronic, etc.
- Provisions regarding failure to reply also are described.

Subchapter B. Electricity Generation Supplier Licensing.

52 Pa. Code § 54.31 – 54.43

§ 54.31. Definitions.

- References to “Code” refer to The [Public Utility Code](#) (66 Pa.C.S. Part I).
- Brokers and marketers are also considered under the term “Electric Generation Supplier (EGS)”
- *Marketer*—An entity, licensed by the Commission, that acts as an intermediary in the sale and purchase of electric energy but does not take title to electric energy. See section 2803 of the code.

§ 54.32. Application process.

- EGSs may not engage in marketing or offer to provide retail electricity or electric generation service until it is licensed by the Commission
- Applications must be verified by an oath or affirmation
- Copies of the completed application with supporting documentation shall be served on the following: the Office of Consumer Advocate, the Office of Small Business Advocate, the Department and the Office of the Attorney General and the EDCs through whose transmission and distribution facilities the applicant intends to supply customers.
- Special instructions apply to “confidential” documents related to the application process. One copy of this confidential or privileged information conspicuously marked at the top as “CONFIDENTIAL” may be submitted to the Office of the Secretary with the application. An applicant shall provide reasons for protecting this information (i.e. financial documentation, etc.). Pending disposition, the information will be used solely for the purpose of evaluating the license application, and the confidentiality of this information will be maintained consistent with regulations in this title pertaining to confidentiality.

§ 54.33. Application form.

- This section reviews required information, solicited via the Commission’s application form. This information will be used to evaluate the financial and technical fitness of the entity to render service. Specific forms of evidence are requested regarding financial information, competency and experience, demonstration of the applicant’s ability to comply with the Commission’s applicable requirements, etc.
- Requires evidence of information demonstrating the applicant’s ability to comply with Commission Applicable requirements concerning customer billing, customer education, billing and terms of service, and customer information. This evidence may include prior regulatory experience of the applicant, prior business experience in energy or other service-oriented industries, staffing and staff training commitments, agreements, arrangements and contracts for customer education and information service, customer satisfaction survey results, government agency reports and complaints statistics compiled by the Better Business Bureau or similar business organizations.

§ 54.34. Change in organizational structure or operational status.

- The Applicant is under a duty to inform the Commission of a material change in the information provided in the application during the pendency of the application, or while the licensee is operating in Pennsylvania.
- Changes in organizational structure or operation; ownership of generation or transmission facilities or other inputs of electric power generation; an affiliation with an EDC, or any entity which owns generation or transmission facilities or other inputs to electric power production; and/or affiliations with an entity that has a franchised service area must be reported to the Commission.
- Notification must be provided within 30 days

§ 54.35. Publication of notice of filing.

- Notice of filing an application shall be published in newspapers of general circulation covering each county in which the applicant intends to provide service as required by § 5.14(a)(2) (relating to applications requiring notice).

- Notices must include the name, the address and telephone number of the applicant, a description of the proposed services to be provided and the geographic area to be served. The notice shall include the application docket number and a statement that protests related to the technical or financial fitness of the applicant shall be filed within 15 days of the publication date of the notice with the Commission's Secretary, Public Utility Commission, P. O.Box 3265, Harrisburg, PA 17105-3265. The notice in an acceptable electronic format shall be submitted to the Commission's Secretary for posting on the Commission's Internet web site and, if appropriate, on the Commission's electronic bulletin board.

§ 54.36. Protests to applications.

- A 15-day protest period commences on the date notice of the application filing published in the newspapers. Interested parties may challenge the technical and financial fitness of the applicant.
- The applicant has 10 days to respond to the protest
- Protests which do not comply with § 5.52(a) will be rejected.
- Staff will review protests and if the protest is sufficiently documented. If a protest is sufficiently documented, the application will be transferred to the Office of Administrative Law Judge for hearings or mediation as deemed appropriate.

§ 54.37. Approval.

- Licenses will be issued if the Commission determines that the applicant meets requirements and definitions, esp. If "The applicant is fit, willing and able to properly perform the service proposed in conformance with applicable provisions of the code and the lawful Commission orders and regulations, specifically including Chapter 56 (relating to Standards and Billing Practices for Residential Utility Service).
- Completed applications, with all supporting documentation, including any documentation or clarifying information requested by Commission staff, if unprotested, will be processed within 45 days after acceptance by the Commission. If the application is not processed within the time period, the application will be deemed approved. The review period may be extended for a reasonable period of time by Secretarial Letter.

§ 54.38. Regulatory assessments.

- Licensee must pay assessments to support regulatory costs, depending on the administrative costs incurred by the Commission related to generation suppliers
- Yearly assessments must be paid within 30 days of receipt of notice.

§ 54.39. Reporting requirements.

- A licensee shall report its level of gross receipts to the Commission on a quarterly basis. Gross Receipt information shall be filed with the Commission within the 30 days following the end of the first full quarter, and of each subsequent quarter that the license is in effect.
- A licensee shall file an annual report on or before April 30 of each year, for the previous calendar year, with information on taxes, gross receipts, total electricity sold, percentage of electricity supplied by each energy source, etc.
- A licensee shall be required to meet periodic reporting requirements as may be issued by the Commission to fulfill the Commission's duty under Chapter 28 of the code (relating to Electricity Generation Customer Choice and Competition Act) pertaining to reliability and to inform the Governor and Legislature of the progress of the transition to a fully competitive electric market.

§ 54.40. Bonds or other security.

- A bond or other security is required to maintain licensure
- The purpose of the security requirement is to ensure the licensee's financial responsibility, the payment of gross receipts tax as required by section 2810 of the code (relating to revenue-neutral reconciliation), and the supply of electricity at retail in accordance with contracts, agreements or arrangements. See section 2809(c) of the code.

- While initial security levels are set at \$250,000, the EGS application provides that brokers may supply a bond for \$10,000
- Bonds must list the PA PUC as the sole beneficiary
- A listing of the prioritization of claims for payment under the security from highest priority to lowest priority as follows: 1) The Commonwealth; 2) EDCs for the reimbursement of Gross Receipts Tax; 3) Private individuals.

§ 54.41. Transfer or abandonment of license.

- License transfer must be approved by the Commission
- A licensee may not abandon service without providing 90 days prior written notice to the Commission, the licensee's customers, the affected distribution utilities and default service providers prior to the abandonment of service. The licensee shall provide individual notice to its customers with each billing, in each of the three billing cycles preceding the effective date of the abandonment.

§ 54.42. License suspension; license revocation.

- Licenses may be suspended or revoked for the following reasons:
 - Failure to pay the yearly assessment
 - Failure to furnish and maintain a bond approved by the Commission for the amount directed by the Commission
 - Nonpayment of taxes
 - Failure to waive confidentiality with respect to tax information
 - Failure to provide the address of its principal office in the Commonwealth or of its registered agent; the failure to follow the principles in § 54.43 (relating to standards of conduct and disclosure for licensees).
 - Violation of applicable provisions of the code, this title and lawful Commission orders. See Section 2809(b) of the code.
 - Violation of Pennsylvania consumer protection law.
 - The transfer of a customer without the customer's consent. See section 2807(d)(1) of the code (relating to duties of electric distribution companies).

§ 54.43. Standards of conduct and disclosure for licensees.

- Licensees shall adhere to the following principles:
 - Provision of accurate and consistent information
 - Response to consumer requests for information regarding energy sources by percentage, and plant emissions of its generation supply
 - Notification of changes in conditions of service, intent to cease operations as an electric generation supplier, explanation of denial of service, proper handling of deposits and proper handling of complaints in accordance with this title.
 - Maintenance of consumer confidentiality, and provision of the right of access by the consumer to his own load and billing information.
 - A licensee may not discriminate in the provision of electricity as to availability and terms of service based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance income, and exercise of rights under Subchapter IV of the Consumer Credit Protection Act (15 U.S.C.A. § § 1691—1691f), relating to Equal Credit Opportunity. See 12 CFR 202-1—202.14 (relating to equal credit opportunity Regulation B).
 - Responsibility for any fraudulent deceptive or other unlawful marketing or billing acts performed by the licensee, its employees, agents or representatives. Licensee shall inform consumers of state consumer protection laws that govern the cancellation or rescission of electric generation supply contracts. See section 7 of the Unfair Trade Practices and Consumer Protection Law (73 P. S. § 201-7).
 - Compliance with relevant Commission regulations, orders and directives that may be adopted.

Chapter 56. Standards and Billing Practices for Residential Public Utility Service.

[52 Pa. Code Ch. 56](#)

This section of code largely addresses the operations of electric distribution utilities, including billing provisions, disconnections, communications, service requirements, and other requirements.

Subchapter A. Preliminary Provisions for Utilities and Customers Subject to Chapter 14 of the Public Utility Code.

§ 56.1. Statement of purpose and policy.

- This chapter establishes and enforces uniform, fair and equitable residential public utility service standards governing eligibility criteria, credit and deposit practices, and account billing, termination and customer complaint procedures.
- This subchapter and Subchapters B—K apply to electric distribution utilities, natural gas distribution utilities, wastewater utilities, steam heat utilities, small natural gas utilities and water distribution utilities. Subchapters L—V apply to all customers who have been granted protection from abuse orders

Subchapter B. Billing and Payment Standards

BILLING

56.11. Billing frequency.

56.12. Meter reading; estimated billing; customer readings.

56.13. Billings for merchandise, appliances and nonrecurring and recurring services.

56.14. Previously unbilled public utility service.

56.15. Billing information.

56.16. Transfer of accounts.

56.17. Advance payments.

PAYMENTS

56.21. Payment.

56.22. Accrual of late payment charges.

56.23. Application of partial payments between public utility and other service.

56.24. Application of partial payments among several bills for public utility service.

56.25. Electronic bill payment.

Subchapter C. Credit and Deposits Standards Policy

BILLING

56.11. Billing frequency.

56.12. Meter reading; estimated billing; customer readings.

56.13. Billings for merchandise, appliances and nonrecurring and recurring services.

56.14. Previously unbilled public utility service.

56.15. Billing information.

56.16. Transfer of accounts.

56.17. Advance payments.

PAYMENTS

56.21. Payment.

56.22. Accrual of late payment charges.

56.23. Application of partial payments between public utility and other service.

- 56.24. Application of partial payments among several bills for public utility service.
- 56.25. Electronic bill payment.

Subchapter D. Interruption and Discontinuance of Service

- 56.71. Interruption of service.
- 56.72. Discontinuance of service.

Subchapter E. Termination of Service

GROUNDS FOR TERMINATION

- 56.81. Authorized termination of service.
- 56.82. Timing of termination.
- 56.83. Unauthorized termination of service.

NOTICE PROCEDURES PRIOR TO TERMINATION

- 56.91. General notice provisions and contents of termination notice.
- 56.92. Notice when dispute pending.
- 56.93. Personal contact.
- 56.94. Procedures immediately prior to termination.
- 56.95. Deferred termination when no prior contact.
- 56.96. Post-termination notice.
- 56.97. Procedures upon customer or occupant contact prior to termination.
- 56.98. Immediate termination for unauthorized use, fraud, tampering or tariff violations.
- 56.99. Use of termination notice solely as collection device prohibited.
- 56.100. Winter termination procedures. 56.101. [Reserved].

EMERGENCY PROVISIONS

- 56.111. General provision.
- 56.112. Postponement of termination pending receipt of certificate.
- 56.113. Medical certifications.
- 56.114. Length of postponement; renewals.
- 56.115. Restoration of service.
- 56.116. Duty of customer to pay bills.
- 56.117. Termination upon expiration of medical certification.
- 56.118. Right of public utility to petition the Commission.
- 56.121—56.126. [Reserved].

THIRD-PARTY NOTIFICATION

- 56.131. Third-party notification.

Subchapter F. Disputes; Termination Disputes; Informal and Formal Complaints

GENERAL PROVISIONS

- 56.140. Follow-up response to inquiry.
- 56.141. Dispute procedures.
- 56.142. Time for filing an informal complaint.
- 56.143. Effect of failure to timely file an informal complaint.

PUBLIC UTILITY COMPANY DISPUTE PROCEDURES

- 56.151. General rule.
- 56.152. Contents of the public utility company report.

INFORMAL COMPLAINT PROCEDURES

- 56.162. Informal complaint filing procedures.
- 56.163. Commission informal complaint procedure.

- 56.164. Termination pending resolution of the dispute.
- 56.165. Conference procedures.
- 56.166. Informal complaints.

FORMAL COMPLAINTS

- 56.171. General rule.
- 56.172. Filing.
- 56.173. Review from formal complaint decisions of the Bureau of Consumer Services.
- 56.174. Ability to pay proceedings.

PAYMENT OF BILLS PENDING RESOLUTION OF DISPUTES AND COMPLAINTS

- 56.181. Duties of parties; disputing party's duty to pay undisputed portion of bills; public utilities duty to pay interest whenever overpayment found.

Subchapter G. Restoration of Service.

- Sec.56.191. Payment and timing.
- 56.192. Personnel available to restore service.

Subchapter H. Public Information Procedures; Record Maintenance

- 56.201. Public information.
- 56.202. Record maintenance.

Subchapter I. [RESERVED]

Sec. 56.211 [Reserved]

Subchapter J. General Provisions.

- 56.222. Applications for modification or exception.
- 56.223. Inconsistent tariff provisions.
- 56.224. [Reserved].

Subchapter K. Public Utility Reporting Requirements.

Sec. 56.231. Reporting requirements.

Subchapter L. Provisions for Victims of Domestic Violence with a Protection From Abuse Order or a Court Order Issued by a Competent Jurisdiction in This Commonwealth Which Provides Clean Evidence of Domestic Violence.

- 56.251. Statement of purpose and policy.
- 56.252. Definitions.

Subchapter M. Billing and Payment Standards.

GENERAL

- 56.261. Billing frequency.
- 56.262. Meter reading; estimated billing; customer readings.
- 56.263. Billings for merchandise, appliances and nonrecurring and recurring services.
- 56.264. Previously unbilled public utility service.
- 56.265. Billing information.
- 56.266. Transfer of accounts.
- 56.267. Advance payments.

PAYMENTS

- 56.271.** Payment.
- 56.272.** Accrual of late payment charges.
- 56.273.** Application of partial payments between public utility and other service.
- 56.274.** Application of partial payments among several bills for public utility service.
- 56.275.** Electronic bill payment.

Subchapter N. Credit and Deposits Standards Policy.

PROCEDURES FOR APPLICANTS

- Sec.56.281.** Policy statement.
- 56.282.** Credit standards.
- 56.283.** Cash deposits; third-party guarantors.
- 56.284.** Deposits for temporary service.
- 56.285.** Payment of outstanding balance.
- 56.286.** Written procedures.
- 56.287.** General rule.
- 56.288.** Payment period for deposits by applicants.

PROCEDURES FOR EXISTING CUSTOMERS

- 56.291.** General rule.
- 56.292.** Payment period for deposits by customers.

CASH DEPOSITS

- 56.301.** Amount of cash deposit.
- 56.302.** Deposit hold period and refund.
- 56.303.** Application of deposit to bills.
- 56.304.** Periodic review.
- 56.305.** Refund statement.
- 56.306.** Interest rate.
- 56.307.** Application of interest.

Subchapter I. Interruption and Discontinuance of Service

- 56.311.** Interruption of service.
- 56.312.** Discontinuance of service.

Subchapter P. Termination of Service

GROUNDINGS FOR TERMINATION

- Sec.56.321.** Authorized termination of service.
- 56.322.** Timing of termination.
- 56.323.** Unauthorized termination of service.

NOTICE PROCEDURES PRIOR TO TERMINATION

- 56.331.** General notice provisions and contents of termination notice.
- 56.332.** Notice when dispute pending.
- 56.333.** Personal contact.
- 56.334.** Procedures immediately prior to termination.
- 56.335.** Deferred termination when no prior contact.
- 56.336.** Post-termination notice.
- 56.337.** Procedures upon customer or occupant contact prior to termination.
- 56.338.** Exception for terminations based on occurrences harmful to person or property.
- 56.339.** Use of termination notice solely as collection device prohibited.
- 56.340.** Winter termination procedures.

EMERGENCY PROVISIONS

- 56.351. General provision.**
- 56.352. Postponement of termination pending receipt of certificate.**
- 56.353. Medical certifications.**
- 56.354. Length of postponement; renewals.**
- 56.355. Restoration of service.**
- 56.356. Duty of customer to pay bills.**
- 56.357. Termination upon expiration of medical certification.**
- 56.358. Right of public utility to petition the Commission.**

THIRD-PARTY NOTIFICATION

56.361. Third-party notification.

- Each public utility shall permit its customers to designate a consenting individual or agency which is to be sent, by the public utility, a duplicate copy of reminder notices, past due notices, delinquent account notices or termination notices of whatever kind issued by that public utility. When contact with a third party is made, the public utility shall advise the third party of the pending action and the efforts which shall be taken to avoid termination. A public utility shall institute and maintain a program:
 - (1) To allow customers to designate third parties to receive copies of a customer's or group of customers' notices of termination of service.
 - (2) To advise customers at least annually of the availability of a third-party notification program and to encourage its use thereof. The public utility shall emphasize that the third party is not responsible for the payment of the customer's bills.
 - (3) To solicit community groups to accept third-party notices to assist in preventing unnecessary terminations and protecting the public health and safety.
 - (4) To make available a standard enrollment form

Subchapter Q. Disputes; Termination Disputes; Informant and Formal Complaints

GENERAL PROVISIONS

- 56.371. Follow-up response to inquiry.**
- 56.372. Dispute procedures.**
- 56.373. Time for filing an informal complaint.**
- 56.374. Effect of failure to timely file an informal complaint.**

PUBLIC UTILITY COMPANY DISPUTE PROCEDURES

- 56.381. General rule.**
- 56.382. Contents of the public utility company report.**

INFORMAL COMPLAINT PROCEDURES

- 56.391. Informal complaint filing procedures.**
- 56.392. Commission informal complaint procedure.**
- 56.393. Termination pending resolution of the dispute.**
- 56.394. Conference procedures.**

FORMAL COMPLAINTS

- 56.401. General rule.**
- 56.402. Filing.**
- 56.403. Review from informal complaint decisions of the Bureau of Consumer Services.**
- 56.404. Ability to pay proceedings.**

PAYMENT OF BILLS PENDING RESOLUTION OF DISPUTES AND COMPLAINTS

- 56.411. Duties of parties: disputing party's duty to pay undisputed portion of bills; public utilities duty to pay interest whenever overpayment found.**

Subchapter R. Restoration of Service.

Sec.56.421. Payment and timing.
56.422. Personnel available to restore service.

Subchapter S. Public Information Procedures; Record Maintenance

56.431. Public information.
56.432. Record maintenance.

Subchapter T. Informal Complaints.

56.441. Informal complaints.

Subchapter U. General Provisions.

56.451. Availability of normal Commission procedures.
56.452. Applications for modification or exception.
56.453. Inconsistent tariff provisions.

Subchapter V. [RESERVED]

Additional Appendices include:

- **Appendix A. Medical Emergency Notice.**
- **Appendix B. Medical Emergency Notice.**
- **Appendix C. Definitions (§ 56.231)**
- **Appendix D. Definitions (§ 56.231(d))**
- **Appendix E. Third-Party Notification**

Appendix E. Third-Party Notification

Once in a while, for one reason or another, a customer fails to pay his or her <UTILITY> bill. Under The Third-Party Notification program, <UTILITY> will notify you and another person you choose to receive copies of shut-off notices. The third-party can be a trusted relative, friend, clergy member, social service agency. The Third-Party Notification program is voluntary and can help you if you are hospitalized, away from home for extended periods of time or homebound. The third-party is not responsible for paying your bills and this program will not stop <UTILITY> from shutting off your <UTILITY> service if you do not pay your bills. When a third-party contacts <UTILITY> about the shut off notice, we will tell them what you can do to stop the shut off. The third-party does not have the right to make a payment agreement for you.

To sign up, both you and the third-party must complete and sign the form below. Do not return this with your bill, return it to:

<UTILITY NAME>

<UTILITY ADDRESS>

<CITY, STATE, POSTAL CODE>

IMPORTANT THINGS TO REMEMBER:

* Notify us immediately if you want to change or drop your third-party.

* Notify us if your third-party moves.

* Notify us if you move and you want the third-party transferred to your new address.

Please sign me up for the third-party Notification program. By completing this form and returning it to <UTILITY>, I request that a copy of any shut off notice be given to the person or agency named below.

CUSTOMER NAME:

<UTILITY> ACCOUNT/CUSTOMER NUMBER:

CUSTOMER ADDRESS:

CUSTOMER SIGNATURE:

DATE:

Receipt of a copy of a shut off notice by the third-party does not place any obligation on that party to pay the <UTILITY> bill for the customer named above nor will it necessarily stop shut off if payment is not made. The notice simply reminds the third-party of a chance to help the customers solve the problem.

THIRD-PARTY NAME:

THIRD-PARTY ADDRESS:

THIRD-PARTY SIGNATURE:

DATE:

Authority

The provisions of this Appendix E issued under the Public Utility Code, 66 Pa.C.S. § § 1401—1419.

Source

The provisions of this Appendix E adopted October 7, 2011, effective October 8, 2011, 41 Pa.B.5473.

Cross References

This appendix cited in 52 Pa. Code § 56.131



Attachment 9

*Experience, Plan and Structure
Pursuant Application Question 8a*

Description of Services and Vision

As described in application question 4c, Wattbuy is an energy intelligence and insights service that allows residents to compare and switch electricity plans in order to save money. Using machine learning to predict electricity usage, our platform provides customers with smart recommendations of electricity suppliers, smart home devices, energy storage, and rooftop solar systems. Our vision is to provide the energy foundation for the connected home.

WattB is paid a referral fee by the Energy Service Companies (ESCOs) it is contracted with, ranging from zero to \$60 per customer, sometimes with a separate residual fee, paid monthly as long as the customers remain with the referred ESCO.

Marketing Plans

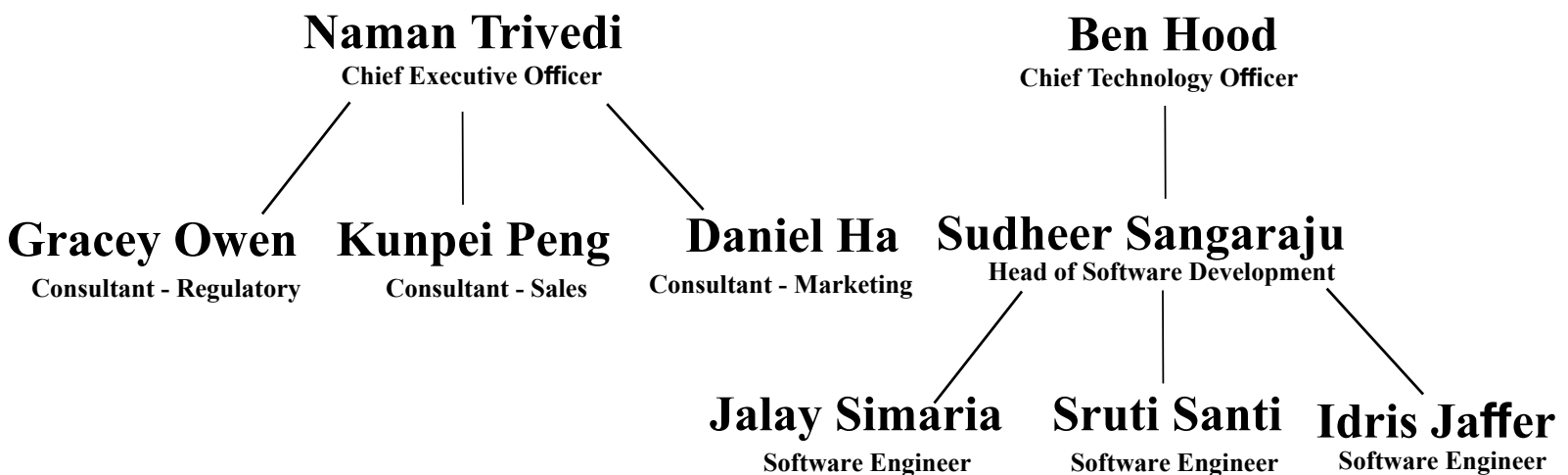
With a license, Wattbuy will start marketing to customers within Pennsylvania to help them compare various electricity plan offerings to help them decide which plan is best for their residence. Wattbuy will exclusively will be serving residential clients, with no plans to serve commercial clients. Marketing will primarily be conducted through digital advertising, through platforms like Google AdWords and Facebook Ads.

Operations in Other States

While Wattbuy holds licenses in several deregulated states (see next page), Wattbuy exclusively serves residential customers in Texas right now. Wattbuy serves around 1000 customers a year in Texas. Please see the following page for a list of states Wattbuy has licenses in.

Technical and Managerial Competencies

Naman Trivedi, CEO and Co-Founder, and Ben Hood, CTO, are the primary business owners and operators of Wattbuy. Their combined experience with business development and electricity markets position Wattbuy for growth and success. See below for a graphical organization of the company.



Licenses in Other Sates

State	Type of License	License No.	Docket/Case
OH	Power Broker (license awarded July, 2019)	19-1417E (1)	19-1340-EL-AGG
TX	Broker (interim; license awarded August, 2019)	BR190231	
NJ	Energy Agent (license awarded September, 2019)	EA-0584	
MA	Electricity Broker (license awarded September, 2019) EB-490	EB-490	
PA	<i>Power Broker (license revoked Oct. 2020) - REAPPLYING</i>	N/A	A-2019-3012205
NH	Electric Load Aggregator (license awarded October, 2019)	DM 19-169	
IL	Broker (license awarded December, 2019)	N/A	19-0973
ME	Competitive Electricity Provider (Broker) (license awarded September 2019)	N/A	2019-00188
DE	Electric Supplier, to broker Electric Supply Service (license awarded June 2020)	N/A	20-0154
RI	No license required (intend to begin operations in 2021)		
NY	No license required		
CT	No license required		

WattB, Inc Code of Conduct

This document seeks to serve as a Code of Conduct for WattB, Inc and its employees with regards to its electricity brokerage services.

1. WattB, Inc is an electricity comparison service for residents to select an electricity plan for their home or apartment. WattB, Inc directly partners with Retail Electricity Suppliers (aka Retail Electricity Providers) to display rate plans for residents to select among.
2. None of the officers or employees of WattB, Inc are employed by any electric utility, REP, or RES in any applicable service territory.
3. WattB, Inc's website (wattbuy.com) discloses in plain language in writing the total price per kilowatt-hour, total anticipated cost, inclusive of all fees or commissions received by WattB, Inc, and to be paid by the customer over the period of the proposed underlying contract. In the event a person or entity required to be licensed pursuant to this Part uses an electric supply usage estimate for a particular customer, the person or entity required to be licensed pursuant to this Part must use the same electric supply usage estimate for all service offers it presents to that particular customer
4. Any disclosure required by subsection (c) must be made prior to entering into the contract and signed by the customer
5. WattB, Inc will disclose, if applicable, to all customers prior to the customer signing a contract the fact that WattB, Inc will be receiving compensation from the supplier.
6. WattB, Inc and its employees will not hold itself out as independent or unaffiliated with any RES, or both, or use words calculated to give that impression
1. WattB, Inc and its employees will Not utilize false, misleading, materially inaccurate, defamatory or otherwise deceptive language or materials in the soliciting or providing of its services;
2. WattB, Inc will maintain copies of all marketing materials disseminated to third parties for a period of not less than three years;
3. WattB, Inc will maintain copies of all disclosure statements required in subsections (1) and (2) for a period of not less than three years;
4. WattB, Inc will not present electricity pricing information in a manner that favors one supplier over another, unless something make a valid pricing comparison utilizing all relevant costs and terms

Illinois Specific

5. WattB, Inc will comply with the requirements of Sections 2EE, 2FF, 2GG and 2HH of the Illinois Consumer Fraud and Deceptive Business Practices Act [815 ILCS 505/2EE, 2FF, 2GG and 2HH].

WattB, Inc Privacy Policy

Privacy Policy

Protecting your private information is our priority. This Statement of Privacy applies to the www.WattBuy.com and all related services provided by WattB and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to WattB include www.WattBuy.com and all other products and services provided by WattB. The WattB website is a Consumer energy data site. By using the WattB website, you consent to the data practices described in this statement.

We have attempted to provide clear explanations of all of our information policies in this Privacy Policy so you can make meaningful decisions about whether to use WattB. If you do not agree to our information policies and practices, you cannot use WattB. If you have questions about our information policies and practices, please contact us at info@wattb.com.

Collection of your Personal Information

We collect information from and about you when you access and use WattB, including personal information. We store and use this information to improve our services, to communicate with you, to respond to requests about the services, to manage accounts and for other uses as set out in the Terms of Service and this Privacy Policy.

We only collect personal information that you voluntarily choose to provide through your WattB account. We will be clear about what personal information we are requesting and collecting, and allow you to choose whether or not to provide that information. We will not collect or scrape additional personal information from your computer, contacts, email, or other personal sources without your express permission.

If you do not want us to have particular personal information, then do not publish that information on your account or post that information on WattB.

Please note that some of the personal information we request is required to activate your account, and some of the personal information we request is required to enjoy the full benefit of WattB. Accordingly, your refusal to provide certain personal information may prevent or limit your use and enjoyment of WattB.

Information about your computer hardware and software may be automatically collected by WattB. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the WattB website.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through WattBs public message boards, this information may be collected and used by others.

WattB encourages you to review the privacy statements of websites you choose to link to from WattB so that you can understand how those websites collect, use and share your information. WattB is not responsible for the privacy statements or other content on websites outside of the WattB website.

Use of Cookies

The WattB website may use cookies to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize WattB pages, or register with WattB site or services, a cookie helps WattB to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same WattB website, the information you previously provided can be retrieved, so you can easily use the WattB features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the WattB services or websites you visit.

Sharing of Information

We only share information about users to improve the services offered under and features of WattB. We will not share or sell personal information with or to third parties, unless the third party relationship is for the limited purpose of improving the services provided to you and the particular third party agrees to honor and follow our information, privacy, and security policies as set out in the Terms of Service and this Privacy Policy. We will not sell or share your personal information for unrestricted third party use.

We may share anonymous, aggregate information about users with our partners and other people and businesses we do business with. In these cases we provide this information in ways that protect your anonymity.

We may choose to sell our company to a third party in the future. User information, including personal information, is typically one of the assets that is transferred to the purchasing party in these transactions. You acknowledge and agree that the purchasing or acquiring party may continue to use user information, including personal information, as set out in this Privacy Policy

Security of your Personal Information

WattB cares about the security of your information. We take reasonable steps to protect information that we collect and store. We may choose to implement additional security features in the future. However, WattB cannot and does not guarantee the security of your information. By using the Watt B website and services, you acknowledge and agree that you provide your information at your own risk.

Children Under Thirteen

WattB does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website. Any attempt by a person under the age of thirteen to use the Site will be automatically void. If WattB receives credible notice that a user is under the age of thirteen, WattB will promptly remove the account associated with the user and delete all information about and from that user.

Opt-Out and Unsubscribe

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. Users may opt-out of receiving any or all communications from WattB by contacting us via the WattB website or at the address set out below.

Changes to this Statement

WattB will occasionally update this Statement of Privacy to reflect company and customer feedback. WattB encourages you to periodically review this Statement to be informed of how WattB is protecting your information.

Contact Information

WattB welcomes your questions or comments regarding this Statement of Privacy. If you believe that WattB has not adhered to this Statement, please contact WattB at: info@wattb.com

Attachment 12, Officer Resumes, Pursuant Application Question 8e

NAMAN TRIVEDI

naman.trivedi94@gmail.com | 408.582.3432

EDUCATION

Georgetown University, Walsh School of Foreign Service, Washington, DC
B.S. International Economics

May 2016

EXPERIENCE

WattBuy, Inc

Co-Founder & CEO

Seattle, WA

Aug 2017 - Present

- Managed the launch of an enterprise-to-consumer electricity marketplace (wattbuy.com) that helps residents discover electricity savings in 17 U.S. states where customers have the power to choose their own electricity provider
- Accepted to the Techstars Accelerator, a seed accelerator with less than 1% acceptance rate; raised \$1,000,000+ in pre-seed capital from Techstars, Department of Energy, and angel investors
- Executed partnerships with 15 U.S. electricity providers (e.g., Direct Energy, NextEra Energy) to list plans on our site
- Grew the company from a two-person startup into a venture with a 6-person engineering team

Google, Inc.

Business Analyst, Google Marketing Solutions

Mountain View, CA

July 2016 – Aug 2017

- Drove Google's advertising revenue by providing advertising solutions for small and medium businesses (SMBs) worldwide
- Achieved 128% to revenue target for mid-market advertisers & selected to join model team pilot; documented 6 product bugs and successfully advocated for 11 feature requests in AdWords
- Created a focus group with the Sales Finance team to re-design the customer satisfaction metric to more closely align the customer support experience with churn risk and revenue impact
- Organized event with Google Public Policy to provide Google tools & resources to nonprofit and advocacy groups in order to better align business and policy objectives

Box, Inc.

Project Management Intern

Los Altos, CA

June 2015 – Aug 2015

- Created Box's new Enterprise Advisory Team, a scaled effort to increase retention of Box's largest enterprise customers
- Efforts led team to hire a full time program manager, who is now managing 300+ customers and over \$9 million in revenue

The White House – Office of Science and Technology Policy (OSTP)

Technology and Innovation Intern

Washington, DC

Sept 2013 – May 2015

- Organized and moderated high-level workshop around information communication technologies and data systems for developing positive feedback mechanisms in global development; formed partnerships with USAID, World Bank, MCC, Hewlett Foundation, and academia
- Drafted report to Congress on federal prize programs (challenge.gov) that spur innovation and advance the core mission of government agencies like NASA, Department of Energy, DARPA, and Department of Defense

The White House – Office of the U.S. Trade Representative (USTR)

Trade Analytics Intern

Washington, DC

June 2014 – Aug 2014

- Drafted memorandum for WTO dispute settlement against Indian export subsidies for their textile sector
- Conducted trade flow analysis through SQL queries on the European Union-South Africa Free Trade Agreement to monitor compliance with World Trade Organization regulations

CONSULTING

Social Innovation Fund, Georgetown University

Fmr. Executive Director, Board Member, Advisor

Washington, DC

Jan 2014 – Present

- Built and led a team of 10 to manage a \$1.5 million student-run social venture fund at Georgetown that provides non-dilutive grants to undergraduates and alumni for socially innovative, purpose-driven ventures

Institute of Electrical and Electronic Engineers (IEEE)

Consultant, Sub-Saharan Africa Policy

Washington, D.C. | Ivory Coast

Aug 2014 – Jan 2014

- Developed partnership strategy and introduced key government partners for IEEE's Global Activities team in Western and Eastern African economic zones

SKILLS

- **International Work Experience:** Haiti, Ivory Coast, Israel, Paraguay
- **Processes:** Agile Development, Scrum, Storyboarding
- **Software:** JIRA, Bitbucket, Google AdWords, Bing Ads, Facebook Ads, SQL, R
- **Languages:** French (intermediate), Gujarati (native)

Ben Hood

+1 (479) 966-9004, +48 514 812 404 • benhood@mac.com • Warsaw, Poland

Experienced software product manager with scientific and technical background.

Work Experience

- CTO, *WattB* 2013 to present
- Managed schedule, delivery, and design of iOS, hardware, and web products to create a home electricity profile for residential consumers
 - Created *WattBuy.com* to facilitate easy electricity switching for consumers in deregulated electricity markets
 - Managed full product lifecycle of two iOS applications: *WattBuddy*, which uses computer vision to read electricity meters and track usage; and *WattZ*, which estimates energy usage of virtually every home in the US
 - Oversaw creation of low cost hardware prototype for current and voltage sensing to enable real-time power monitoring
- Director of Product Management, *Metabiota* 2016
- Oversaw definition and strategy for startup company's new product line directed at government customers
 - Gathered requirements from customers, developing, refining and prioritizing user stories for engineering team to build most impactful product
 - Created collateral and roadmap for new product for situational awareness, analysis, and modeling of natural and intentional biological threats
 - Served as liaison between traditionally services-focused DC office, and technology/product-focused San Francisco office
- Principal Product Manager, *Endgame* 2013 to 2016
- Managed prioritization and planning for *Endgame's* federal product line, including web-based data analysis and cyber security platforms
 - Introduced two-week sprints and agile software development to four teams across two divisions, consistently delivering new features to our customers with maximum visibility to upper management
 - Led process to identify new opportunities, retire underperforming products
 - Prepared and delivered technical briefings to prospective, current customers
- Product Manager, *Berico Technologies* 2011 to 2013
- Oversaw *Berico's* contributions to ORION, a cloud-based analytical platform to extract actionable intelligence from data in the US intelligence community
 - Led 18 developers on four teams, balancing features, schedule, and cost
 - Collected global customer and developer requirements to guide product direction, writing use cases and prioritizing for maximum impact
 - Served as ambassador for product, demonstrating at trade shows and community forums, and delivering key product messages
- Economics Officer, *U.S. Consulate, Istanbul, State Department* 2010 to 2011
- Gathered information from Turkish Government and C-level executives
 - Delivered key points and represented US interests at business gatherings
 - Analyzed and reported to US Government on Turkish economic issues
 - Led Consulate initiative on Turkish entrepreneurship, serving as mentor to small startups and software engineers

- Computer Science Visiting Lecturer, *Istanbul Technical University* 2010 to 2011
- Designed and delivered weekly two-hour lecture on introductory C programming to over sixty Turkish freshmen engineering students
 - Graded exams and managed key metrics to ensure students' success in class
 - Provided mentorship to students attempting to attend graduate school in the hard sciences, and those wanting to visit the US
 - Delivered several speeches and guest lectures on astronomy, computer development, and the US academic system
- Founder and Principal Engineer, *GuyGood Apps* 2009 to 2011
- Conceived, designed, and engineered *Space Cowboy*, iOS game for app store
 - Coordinated with remote graphics artist for original artwork for game
 - Created custom summer seminar series to teach Objective-C and Cocoa Touch to five junior Turkish engineers, creating iOS game
- Senior Product Manager, *AOL Video & Winamp* 2007 to 2009
- Owned the vision and product roadmap for *Winamp* and *AOL Video*, passionate communities of over 100 million combined monthly users
 - Managed AOL Video APIs, Winamp website, Winamp Client through product lifecycle using agile development with global cross-functional team
 - Evaluated new technologies and analyzed customer feedback to guide the development decisions for new products
 - Revamped social strategy for Winamp on web, building new experience

Awards

- Department of Energy Apps for Energy (2014): *\$50,000 prize for WattBuddy*
- Arkansas Young Alumni Award (2013): *Recognizing exceptional achievement*
- State Department Meritorious Honor Award (2011): *Service to Istanbul Consulate*
- Marshall Scholar (2002): *British fellowship for forty Americans for graduate study*

Academics

- Ph.D., Astrophysics, *University of St. Andrews, Scotland* 2007
 Thesis: *Search and Characterization of Extrasolar Planets*
- B.S., Physics, Summa Cum Laude, *University of Arkansas* 2003
- B.S., Computer Engineering, Summa Cum Laude, *University of Arkansas* 2002

Attachment 13

Newspaper Proofs
Pursuant Application Question 12

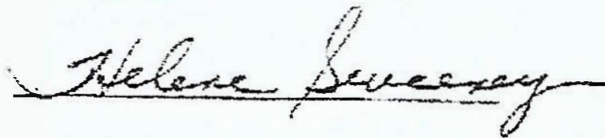
Proof of Publication in The Philadelphia Daily News Under Act. No 587, Approved May 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

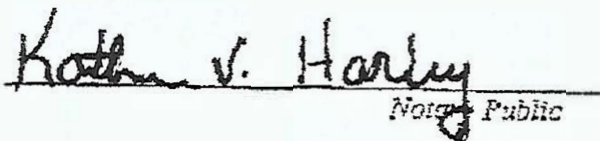
Helene Sweeney being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the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

December 14, 2020

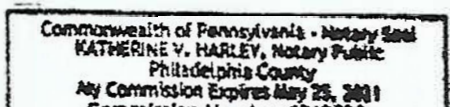
Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to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



Sworn to and subscribed before me this 14th, day of
December, 2020.


Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

Application of **WattB, Inc. (d/b/a "WattBuy")** For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A **Marketer/Broker Engaged In The Business Of Supplying Electricity, And An Aggregator Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.**

WattB, Inc. will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as a broker/marketer engaged in the business of supplying electricity. **WattB, Inc.** proposes to sell electricity and related services in the **Entire Commonwealth** under the provisions of the new Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **WattB, Inc.** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **WattB, Inc.'s** attorney at the address listed below.

By and through Counsel: **Jamie Fugitt**
WattB, Inc.

227 Bellevue Way NE, #871
Bellevue, WA 98004-5721
Wattbuy.com
(408) 582-3432

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

WATTBUY
NAMAN TRIVEDI
227 BELLEVUE WAY NE, #871 BELLEVUE WA 98004

Account # 634250
Order # 82500403
Ad Price: 237.50

LEGAL NOTICE PENNSYLVANIA

Sharon Venturi

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

12/10/2020

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

Sworn and subscribed to before me
this 10th day of December A.D., 2020

[Signature]
(Notary Public)

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Kathleen Weaver, Notary Public
City of Scranton, Lackawanna County
My Commission Expires June 14, 2021

LEGAL NOTICE

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
Application of **WattB, Inc.** (d/b/a "**WattBuy**") For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A **Marketer/Broker** Engaged In The Business Of Supplying Electricity, And An **Aggregator** Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.

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By and through Counsel:
Jamie Fugitt
WattB, Inc.
227 Bellevue Way NE, #871
Bellevue, WA 98004-5721
Wattbuy.com
(408) 582-3432

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

STATE OF PENNSYLVANIA

COUNTY OF LYCOMING

SS:

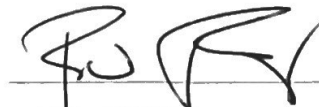
Robert O. Rollev, Jr., Publisher of the Sun-Gazette LLC publishers of the Williamsport Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and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

December 11, 2020

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

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
Application of WattB, Inc. (d/b/a "WattBuy") For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A Marketer/Broker Engaged In The Business Of Supplying Electricity And An Aggregator Engaged In The Business Of Supplying Electricity To The Public In The Commonwealth Of Pennsylvania.
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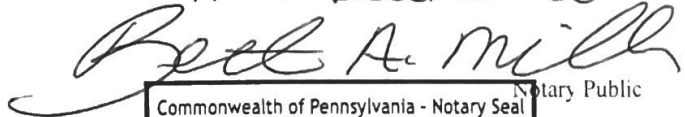
The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of WattB, Inc. may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to WattB, Inc.'s attorney at the address listed below.
By and through Counsel:
Jamie Fugitt
WattB, Inc.
227 Bellevue Way NE,
#871
Bellevue, WA
98004-5721
Wattbuy.com
(408) 582-3432



SUN-GAZETTE LLC

Sworn to and subscribed before me

The 11th day of December 2020



Commonwealth of Pennsylvania - Notary Seal
BETH A MILLER - Notary Public
Lycoming County
My Commission Expires Jun 4, 2024
Commission Number 1297751

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:

For publishing the notice attached

Hereto on the above state dates\$ 245.32

Probated same.....\$

Total.....\$ 245.32

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

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

SUN-GAZETTE LLC

BY Robert O. Rollev, Jr.

Proof of Publication of Notice in Pittsburgh Post-Gazette

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

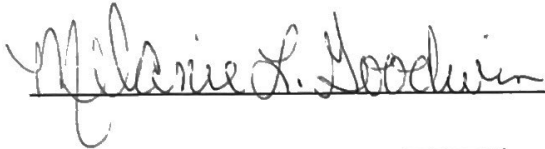
Commonwealth of Pennsylvania, County of Allegheny, ss K. Flaherty, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette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

17 of December, 2020

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



PG Publishing Company
Sworn to and subscribed before me this day of:
December 17, 2020



Melanie L. Goodwin

Commonwealth of Pennsylvania - Notary Seal
Melanie L. Goodwin, Notary Public
Allegheny County
My commission expires May 12, 2022
Commission number 1255781
Member, Pennsylvania Association of Notaries

STATEMENT OF ADVERTISING COSTS
wattbuy
227 Bellevue Way
Bellevue Washington 98004

To PG Publishing Company

Total ----- \$403.00

Publisher's Receipt for Advertising Costs

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

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

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

By _____

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

Attorney For

COPY OF NOTICE OR PUBLICATION

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE
Application of WattB, Inc. (d/b/a "WattBuy") For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A Marketer/Broker Engaged In The Business Of Supplying Electricity, And An Aggregator Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.

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By and through Counsel:
Jamie Fugitt
WattB, Inc.
227 Bellevue Way NE, #871
Bellevue, WA 98004-5721
Wattbuy.com
(408) 582-3432

COMMONWEALTH OF PENNSYLVANIA }
 County of Cambria } SS

PENNSYLVANIA
 PUBLIC UTILITY COMMISSION
 NOTICE

Application of **WattB, Inc.** (d/b/a "WattBuy") For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A Marketer/Broker Engaged In The Business Of Supplying Electricity, And An Aggregator Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.

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By and through Counsel: Jamie Fugitt
WattB, Inc.
 227 Bellevue Way NE, #871
 Bellevue, WA 98004-5721
 Wattbuy.com
 (408) 582-3432

published that the of The Job interested character

On this 18th day of December A.D. 2020, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Christine Marhefka, who being duly sworn according to law, deposes and says as Sales Manager / Major Accounts of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,

of Cambria, and Commonwealth of Pennsylvania and matter published in said publication in the regular issues on December 11, 2020; and that the Affiant is not signing and that all of the allegations as to time, place and

Christine Marhefka

STATEMENT OF ADVERTISING COSTS

Signed and sworn to before me on 18th day of December, 2020, by Christine Marhefka making the statement.

0.00 Lines @	\$2.50 per line	0.00
65 Inches @	\$25.00 per inch	162.50
Notary Fee		5.00
Clerical Fee		2.50
Total Cost		170.00

[Signature]

Commonwealth of Pennsylvania - Notary Seal
 Vivian Ohs, Notary Public
 Cambria County
 My commission expires December 6, 2024
 Commission number 1123017
 Member, Pennsylvania Association of Notaries

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

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

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

 (Name of Newspaper)

By _____

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

Naman Trivedi
377 E 33rd St. Apt #18F
New York NY 10016

REFERENCE: 151129 420797
PUC Notice

STATE OF PENNSYLVANIA)
COUNTY OF ERIE) SS:

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

PUBLISHED ON: 12/12/20

TOTAL COST: \$543.00 AD SPACE: 0 Lines

FILED ON: 12/12/20

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

*Application of **WattB, Inc.** (d/b/a "**WattBuy**") For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A **Marketer/Broker** Engaged In The Business Of Supplying Electricity, And An Aggregator Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.*

WattB, Inc. will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as a broker/marketer engaged in the business of supplying electricity. **WattB, Inc.**, proposes to sell electricity and related services in the Entire Commonwealth under the provisions of the new **Electricity Generation Customer Choice and Competition Act**.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **WattB, Inc.** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **WattB Inc.**'s attorney at the address listed below.

By and through Counsel: Jamie Fugitt

WattB, Inc.

227 Bellevue Way NE, #871
Bellevue, WA 98004-5721

Wattbuy.com
(408) 582-3432

EP-420797

Sworn to and subscribed before me this 10th day of December 2020

Affiant: Lorri Stefanelli

NOTARY: Barbara J Moore

Commonwealth of Pennsylvania - Notary Seal
Barbara J. Moore, Notary Public
Erie County
My commission expires March 23, 2024
Commission number 1114860
Member, Pennsylvania Association of Notaries

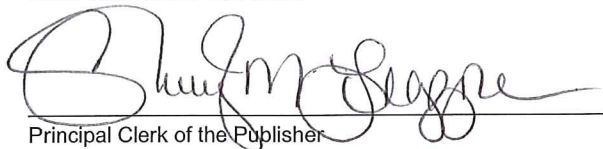


AD#: 0009824136

Commonwealth of Pennsylvania,) ss
County of Cumberland)

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

The Patriot News 12/17/2020


Principal Clerk of the Publisher

Sworn to and subscribed before me this 21th day of December 2020


Notary Public

Commonwealth of Pennsylvania - Notary Seal
Crystal B. Rosensteel, Notary Public
Dauphin County
My commission expires June 27, 2024
Commission number 1299212
Member, Pennsylvania Association of Notaries

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

Application of **WattB, Inc.** (d/b/a " **WattBuy**") For Approval To Offer, Render, Furnish Or Supply Electricity Or Electric Generation Services As A Marketer/Broker Engaged In The Business Of Supplying Electricity, And An Aggregator Engaged In The Business Of Supplying Electricity, To The Public In The Commonwealth Of Pennsylvania.

WattB, Inc. will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to supply electricity or electric generation services as a broker/marketer engaged in the business of supplying electricity. **WattB, Inc.** proposes to sell electricity and related services in the Entire Commonwealth under the provisions of the new Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **WattB, Inc.** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **WattB Inc.**'s attorney at the address listed below.

By and through Counsel:
Jamie Fugitt
WattB, Inc.
227 Bellevue Way NE, #871
Bellevue, WA 98004-5721
Wattbuy.com
(408) 582-3432

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Florida :

: ss.

County of Miami-Dade :

Naman Yatin Trivedi, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the CEO (Office of Affiant) of WattB, Inc. (Name of Applicant);]

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

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

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

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

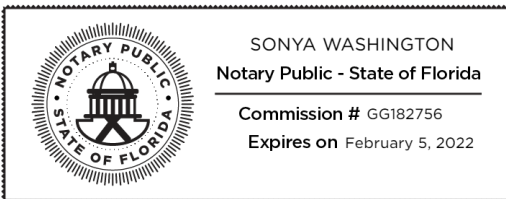
That the Applicant herein he acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

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

Naman Trivedi

Signature of Affiant

Sworn and subscribed before me this 13th day of January, 2021.



Sonya Washington

Signature of official administering oath
Online Notary

My commission expires 02/05/2022.

WA Drivers license provided

Notarized online using audio-video communication

Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Florida :

: **SS.**

County of Miami-Dade :

Naman Yatin Trivedi, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the CEO (Office of Affiant) of WattB, Inc.
(Name of Applicant);]

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

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

That he, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render electric service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That he, the Applicant herein, certifies to the Commission that it is subject to , will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 28 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28, shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional Gross Receipts and power sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

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

Appendix B (Continued)

That he, 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.

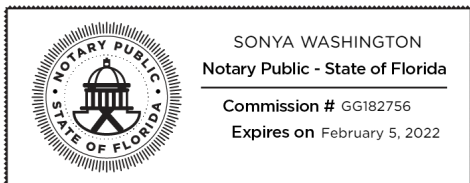
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Bureau of Public Liaison or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the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

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

Naman Trivedi

Signature of Affiant

Sworn and subscribed before me this 13th day of January, 2021.



Sonya Washington

Signature of official administering oath
Online Notary

My commission expires 02/05/2022.

Notarized online using audio-video communication

WA Drivers license provided

Appendix C

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

Example CERTIFICATE OF SERVICE

On this the 13 th day of January 2021, 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 (Electric Broker) and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or electronically (with previous approval/ communication with the agency), 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
Consumer@paoca.org, dlawrence@paoca.org

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
ra-sba@pa.gov

Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830
rmiller@corninggas.com

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



Naman Trivedi, CEO and Co-Founder