

Deanne M. O'Dell
717.255.3744
dodell@eckertseamans.com

March 18, 2021

Via Electronic Filing & Federal Express

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Inspire Digital Services PJM, LLC's Application for an Electric Generation Supplier License – Docket No. A-2021-3023581

Dear Secretary Chiavetta:

On behalf of Inspire Digital Services PJM LLC (“Inspire”) enclosed please find its Responses to the Commission’s Data Requests. Please note these Responses include confidential material and should be handled accordingly. The public version of this is being electronically filed and the confidential version is being delivered via Federal Express to the Commission.

Sincerely,



Deanne M. O'Dell

DMO/lww

Enclosure

cc: Jeremy Haring (jharing@pa.gov)

PUBLIC Version

Docket No. A-2021-3023681
Inspire Digital Services PJM, LLC
Responses to TUS Requests

1. Reference Application, Section 7.b, Financial Fitness – Applicant provided minimal documentation to demonstrate financial fitness. Please provide additional financial fitness documentation that may include two recent consecutive years of financial statements, two recent consecutive years of income tax filings, and three recent consecutive months of bank statements.

RESPONSE: See Enclosed **CONFIDENTIAL** Financial Statements.

2. Reference Application, Section 5.a, Customer/Regulatory/Prosecutory Actions

A. Please provide details for any complaints, including a breakdown by topics of the complaints, the state the complaint was filed in, and the outcome.

RESPONSE: Inspire deeply values its relationships and reputation with consumers as a leading provider of access to clean energy plans. We are vigilant with respect to compliance with federal, state, and commission laws. We take all consumer complaints very seriously and set the highest standards for customer satisfaction. The Applicant, Inspire Digital has not received any customer, regulatory, or prosecutory actions. Inspire’s records for the past 24 months for the Applicant’s affiliate, Inspire Energy Holdings, LLC a licensed electricity supplier, are provided below (including BBB complaints):

State	Number of Complaints
Delaware	0
District of Columbia	1
Illinois	62
Maryland	25
Massachusetts	30
New Jersey	40
New York	10
Ohio	179
Pennsylvania	147
Total	494

Inspire Energy Holdings, LLC serves about **[BEGIN CONFIDENTIAL]** 

[REDACTED] **[END CONFIDENTIAL]**

- B. Please provide specific details of any open complaints any affiliates have, including complaint topics, complaint details, and the status of the open complaints

Response: Inspire Energy Holdings, LLC has **[BEGIN CONFIDENTIAL]** [REDACTED]

[REDACTED] **[END**

CONFIDENTIAL]

VERIFICATION

I, Andrew Meyer, hereby state that: (1) I am the General Manager and Corporate Officer for Inspire Digital Services PJM, LLC; (2) I am authorized to submit these discovery responses on behalf of Inspire Digital Services PJM, LLC; (3) I am authorized to make this verification on its behalf; and, (4) the facts set forth in the attached Responses to Discovery are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Date: March 18, 2021

Andrew Meyer
General Manager and Corporate Officer
Inspire Digital Services PJM, LLC