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| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  400 NORTH STREET, HARRISBURG, PA 17120 | **IN REPLY PLEASE REFER TO OUR FILE** |

May 6, 2021

Docket No. A-2021-3025116

Utility Code: 1122484

**EMAIL**

SUSAN BRUCE ESQUIRE

MCNEES WALLACE & NURICK LLC

PO BOX 1166

100 PINE STREET

HARRISBURG PA 17108

RE: Electric Generation Supplier License Application

Dear Attorney Bruce:

On April 8, 2021, the Public Utility Commission accepted Inova Energy LLC’s application for an Electric Generation Supplier license. The application was incomplete. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached question(s).

Please be advised that you are directed to forward the requested information to the Commission within **30** days from the date of this letter. Failure to respond may result in the application being denied. As well, if Inova Energy LLC has decided to withdraw its application, please reply notifying the Commission of such a decision.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

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| --- |
| Rosemary Chiavetta, Secretary |
| Pennsylvania Public Utility Commission |
| 400 North Street |
| Harrisburg, PA 17120 |

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter.  I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite completion of the application, please also e-mail the information to Jeremy Haring at [jharing@pa.gov](mailto:jharing@pa.gov). Please direct any questions to Jeremy Haring, Bureau of Technical Utility Services, at [jharing@pa.gov](mailto:jharing@pa.gov) (preferred) or (717) 783-6175.

**** Sincerely,

Rosemary Chiavetta

Secretary

Enclosure

Docket No. A-2021-3025116

Inova Energy LLC

Data Requests

1. Reference Application, Section 7.a, Financial Fitness – Applicant’s financial security states applicant’s name as “Inova Energy LLC.” (note the period), however, the PA Department of State indicates that the Applicant’s registered name is “Inova Energy LLC” with no punctuation. Please provide an updated financial security that matches the PA Department of State exactly (including capitalization, spacing and punctuation).

2. Reference Application, Section 7.b, Financial Fitness – Applicant stated that agreements have been made with Pike. Please provide documentation that verifies these agreements.

3. Reference Application, Section 7.b, Financial Fitness – Applicant provided unaudited financial statements. None of the numbers are supported by the documentation provided. Please provide financial documentation that supports the stated amounts.

4. Reference Application, Section 7.c, Supplier Funding Method:

1. Explain if the line of credit is secured.
2. If so, is it secured with funds that are being utilized in either the Clear Energy Solutions LLC funding or funds elsewhere in this application.
3. Provide the full credit agreement for all funding sources dedicated to Inova Energy LLC;
4. Explain the discrepancy in the amounts mentioned throughout the financial discussion not being consistent with the statement for the line of credit.
5. Please confirm that none of the assets, stated in this application, were utilized as funding for Clear Energy Solutions LLC’s financial fitness.

5. Reference Application, Section 8, Technical Fitness – Applicant stated an Affiliate has licenses in multiple jurisdictions.

1. Please explain if any of the electric licenses, in other jurisdictions, allow the delivery of power to customers in the same manner (as an EGS supplier) being proposed in this application.
2. If yes to Part A, how many customers are being provided full generation service within each jurisdiction?

6. Reference Application, Section 8.a, Technical Fitness – Applicant indicated Cognitive Energy, LLC d/b/a POWWR, LLC (POWWR) will provide Inova’s technical fitness. Provide the following information:

1. Provide a fully executed agreement between Inova and POWWR;
2. Provide the agreements start and termination dates;
3. Provide the services, with descriptions and details, that will be performed by POWWR and cite specifically where the services are in the agreement;
4. Reference Technical Fitness Attachment 1E –
   1. Provide a description of what each line item means and the work that will be provided for each item.
   2. If not provided in response to 3.c. above, provide the location in the Inova and POWWR contract that supports POWWR providing each product and service in the list.
5. Provide POWWR’s PJM and NYISO agreements and registrations;
6. Provide details of POWWR’s other clients and the States where the same services, in the agreement, have been performed;
7. Provide a detailed description of the process, from start to finish, when a new customer is signed up with Inova as a supplier through the time the customer is switched to Inova Energy LLC;
8. Provide information on which company, Inova Energy LLC or POWWR, will be in communication with Pike County Light and Power Company to setup power and provide details on how a customer bill will be created.

7. Reference Application, Section 8.d, Technical Fitness – Applicant stated that all marketing will be proofed by McNees Wallace and Nurick LLC. Please provide a copy of the contract that states this service will be provided and the details of their involvement.

8. Reference Application, Section 13, Signature – Applicant failed to provide a signature. Please provide an updated application page with the appropriate corrections.

9. Reference Application, Appendix 1D – Applicant states amounts for Pikes total electricity load profile as well as the capital requirement for said load profile. Please provide details as to how these numbers were obtained.

10. Reference Application, Appendix 1D, scaling table– Please provide a thorough explanation of the data in the scaling table.