



May 13, 2021

**VIA ELECTRONIC FILING**

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

**RE: TFS Energy Solutions, LLC d/b/a Tradition Energy Electric Generation Supplier License Application**

To Whom It May Concern:

Enclosed please find the Electric Generation Supplier (EGS) License Application ("Application") for TFS Energy Solutions, LLC d/b/a Tradition Energy ("Applicant.")

Applicant respectfully requests expedited service of this Application as Applicant's license Number A-2009-2132890 was recently cancelled due to a mailing error (Applicant timely filed via email its Bond Continuation Certificate with the Pennsylvania Public Utility Commission ("Commission") but Applicant's insurance carrier did not mail a hard copy of the Bond to the Commission due to the pandemic). Prior to cancellation, Applicant was a broker licensed in Pennsylvania in good standing since 2009 without any complaints or missed filings. Applicant also respectfully requests that the Publication requirements set forth in the Application be waived because of Applicant's prior good standing status, loss of license due to a good faith mistake and also due to the fact that Applicant is seeking licensing as a broker and not an electricity supplier that takes title to electricity.

Applicant will be mailing to the Commission via overnight delivery its confidential materials set forth in Section 7B and Appendix I to the Application as well as its original Bond.

Also please note that Applicant will file its completed Certificate of Service under separate cover as soon as possible but no later than May 21, 2021.

If you need any additional information, please contact me at 203-391-2253 or [lauren.zinman@tradition.com](mailto:lauren.zinman@tradition.com). Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lauren Zinman".

Lauren Bauer Zinman, Esq.  
General Counsel  
Tradition Energy

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of TFS Energy Solutions, LLC, d/b/a Tradition Energy, 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:

**TFS Energy Solutions, LLC d/b/a Tradition Energy, 9 West Broad Street, 9th Floor Stamford, CT 06902  
www.traditionenergy.com  
(877) 517-6937**

- 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.

**CoGency Global, Inc., 600 North 2nd Street, PA 17101  
Toll Free: 800.221.0102 Ext. 1141  
Fax: 800.944.6607**

- 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.

**Brian McDermott, Executive Director and Head of Operations 9 West Broad Street, 9th Floor Stamford, CT 06902  
(o) 203-205-9650 (fax) 203-967-0426  
Brian.mcdermott@traditionenergy.co**

- d. **ATTORNEY:**<sup>m</sup> 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.

**Lauren Zinman, Esq.  
General Counsel, Tradition Energy  
9 West Broad Street, 9th Floor, Stamford, CT 06902 (o) 203-391-2253 (fax) 203-967-0426  
lauren.zinman@tradition.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.

**Brian McDermott, Executive Director and Head of Operations  
9 West Broad Street, 9th Floor, Stamford, CT 06902**

**(o) 203-205-9650 (f) 203-967-0426  
Email: Brian.mcdermott@traditionenergy.com**

**Mario Perez, VP Client Services  
9 West Broad Street, 9th Floor, Stamford, CT 06902 (o) 203-391-2251 (f) 203-967-0426 Email: 4  
Mario.perez@traditionenergy.com**

**2. BUSINESS ENTITY FILINGS AND REGISTRATION**

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

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

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

**See Exhibit 2A.                      or**

The Applicant will not be using a fictitious name.

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

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

The Applicant is a sole proprietor.

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

**or**

The Applicant is a:

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

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

**or**

The Applicant is a:

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

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above. **See Exhibit 2B(1)**
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. **Delaware. See Exhibit 2B(2)**
- Give name and address of officers.

**Alan Kurzer, CEO, 9 West Broad Street, 9th Floor, Stamford, CT 06902**

Brian McDermott, Executive Dir., 9 West Broad Street, 9th Floor,

- Stamford, CT 06902

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### **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.

**No affiliates of Applicant are jurisdictional public utilities and no affiliates of Applicant are applying to do business in Pennsylvania.**

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

**Applicant does not have any predecessors. Applicant has done business within the preceding five years under the name "Tradition Energy" at Applicant's same address, web address and telephone number.**

#### 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.

**Applicant proposes to contract with its customers to solicit bids from energy suppliers; assist in the selection of an energy supplier and manage its continuing energy costs and needs. Applicant does not intend to provide billing statements to customers. Applicant will not take title to electricity.**

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

- |   |   |
|---|---|
| <input type="checkbox"/> Citizens' Electric | <input type="checkbox"/> Pike                                 |
| <input type="checkbox"/> Duquesne Light     | <input type="checkbox"/> PPL                                  |
| <input type="checkbox"/> Met-Ed             | <input type="checkbox"/> UGI Utilities                        |
| <input type="checkbox"/> PECO               | <input type="checkbox"/> Wellsboro                            |
| <input type="checkbox"/> Penelec            | <input type="checkbox"/> West Penn                            |
| <input type="checkbox"/> Penn Power         | <input checked="" type="checkbox"/> 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. **Upon approval.**

## 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.

**Neither Applicant, its affiliates, 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.**

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

**Not applicable.**

- 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.

**Applicant had no complaints or actions. Applicant's electricity license A-2009-2132890 was canceled on December 22, 2020 at Docket Number M-2020-3015227 due to non-receipt of the original Bond Continuation Certificate in 2020.**

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

## 6. PROOF OF SERVICE

*Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator. (Example Certificate of Service is attached at Appendix C)*

**Proof of Service will be filed separately from this Application by May 21, 2021.**

- 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. **Applicant is applying to be a Broker only and will not take title to any electricity sold or pay electricity bills on behalf of its customers. Therefore, consistent with Commission precedent, Applicant requests permission to furnish a Bond in the amount of \$10,000.**

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

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

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

- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies. **See Exhibit 7A.**
- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient).

**See [https://tradition.com/media/322394/RACFT2020\\_WEB.pdf](https://tradition.com/media/322394/RACFT2020_WEB.pdf) for Applicant's parent entity 2020 Annual Report.**

- Applicant's accounting statements, including balance sheet and income statements for the past two years.

**See Exhibit 7B which are Applicant's confidential financial statements which are filed separately via hard copy with the Commission.**

- 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.

**See Exhibit 7C as a sample Certificate of Insurance for Applicant.**

- 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.

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.

**Not applicable as Applicant is a Broker.**

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

**Applicant intends to be paid by most of its customers via a fee embedded in the customer's choice of third party energy supplier. A few of Applicant's customer may pay Applicant directly for its services.**

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.

**Marco Colangelo, Director on Finance, 9 West Broad Street, Stamford, CT 06902 (O) 203-391-2254 (f) 203- 351-9567 Email: Marco.colangelo@traditionenergy.com. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be**

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: **See Exhibit 8.**

- 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.

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.

Applicant has a **Senior Director of Marketing** who ensures that all company marketing is performed in an ethical manner for both employees and any applicable subcontractors. All marketing follows **US CAN SPAM** requirements and recommendations. Any and all marketing claims are backed by first-hand research and approved by senior management in advance.

- 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.

**Alan Kurzer, Chief Executive Officer**  
**Brian McDermott, Executive Director and Head of Operations**

See Exhibit 8e for more information.

- 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](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: TFS Energy Solutions, LLC

By: Brian J. McD

Title: Executive Director and Head of Operations

**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: TFS Energy Solutions, LLC**

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

Applicant's Use

PUC Secretary's Bureau Use



Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Connecticut :

: ss.

County of Fairfield :

Brian McDermott, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Executive Director (Office of Affiant) of TFS Energy Solutions, LLC (Name of Applicant);]

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

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

That the Applicant herein TFS Energy Solutions, LLC 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 TFS Energy Solutions, LLC 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.

Brian J. McDermott  
Signature of Affiant

Sworn and subscribed before me this 13<sup>th</sup> day of MAY, 2021.

Susan Detorres  
Signature of official administering oath

My commission expires October 31, 2023

Susan Detorres  
Notary Public-Connecticut  
My Commission Expires  
October 31, 2023

Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Connecticut :

: SS.

County of Fairfield :

Brian McDermott, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Executive Director (Office of Affiant) of TFS Energy Solutions, LLC (Name of Applicant);]

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

That TFS Energy Solutions, LLC, 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 TFS Energy Solutions, LLC, 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 TFS Energy Solutions, LLC, 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).

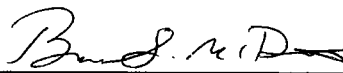
As provided by 66 Pa. C.S. §2810 (C)(6)(iv), Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing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

**Appendix B (Continued)**

That TFS Energy Solutions, LLC, 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.

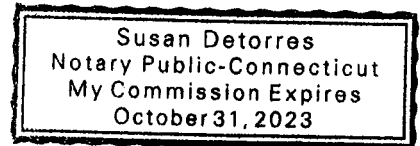
That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.

  
\_\_\_\_\_  
Signature of Affiant

Sworn and subscribed before me this 13<sup>th</sup> day of MAY, 2021.

  
\_\_\_\_\_  
Signature of official administering oath

My commission expires October 31, 2023.



## Appendix C

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

### Example CERTIFICATE OF SERVICE

On this the \_\_\_\_ day of \_\_\_\_\_ 20\_\_, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as an Electric Generation Supplier and all **NON-CONFIDENTIAL** attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

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

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

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

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

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

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

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

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

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

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

Legal Department  
First Energy  
2800 Pottsville Pike  
Reading PA, 19612

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

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

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

**APPLICANT WILL PROVIDE  
CERTIFICATE OF SERVICE BY  
MAY 21, 2021**

# EXHIBIT 2A

Entity #: 3906064  
Date Filed: 09/17/2009  
Pedro A. Cortés  
Secretary of the Commonwealth

## PENNSYLVANIA DEPARTMENT OF STATE CORPORATION BUREAU

### Application for Registration of Fictitious Name 54 Pa.C.S. § 311

Name: TFS ENERGY SOLUTIONS, LLC			
Address: 680 Washington Boulevard, Floor 5			
City	State	Zip Code	
Stamford	CT.	06901	

Document will be returned to the name and address you enter to the left.

Commonwealth of Pennsylvania  
FICTITIOUS NAME 2 Page(s)



Fee: \$70

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

1. The fictitious name is: TRADITION ENERGY
--

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: Aggregator acting on behalf of customers to purchase electricity.
--

3. The address, including number and street, if any, of the principal place of business (P.O. Box alone is not acceptable):				
680 Washington Boulevard, Fl. 5	Stamford	CT.	06901	Dauphin
Number and street	City	State	Zip	County

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

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

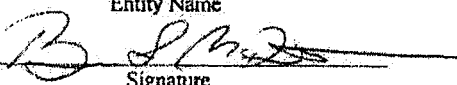
TFS Energy Solutions, LLC	Limited Liability Company	DE
Name	Form of Organization	Organizing Jurisdiction
680 WASHINGTON BOULEVARD, FL 5 STAMFORD, CT. 06901		
Principal Office Address		
NATIONAL CORPORATE RESEARCH, LTD. 600 NORTH 2 <sup>ND</sup> ST, HARRISBURG, PA. 17101		
PA Registered Office, if any		
Name	Form of Organization	Organizing Jurisdiction
Principal Office Address		
PA Registered Office, if any		

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

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

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

14 day of September, 2009.

Individual Signature	Individual Signature
Individual Signature	Individual Signature
TFS Energy Solutions, LLC	
Entity Name	Entity Name
	Signature
Senior Director	Title
Title	Title

Corporations Search Business Entities (corpsearch.aspx) Search UCC Transactions (uccsearch.aspx) Forms

Contact Corporations (http://www.dos.pa.gov/BusinessCharities/Pages/default.aspx) Login (https://hub.business.pa.gov/login)

Search entity / Select entity / Order documents

### Order Business Documents



Date: 05/11/2021

#### Business Name History

Name	Name Type
TFS Energy Solutions, LLC	Current Name

#### Business Entity Details Officers

Name	TFS Energy Solutions, LLC
Entity Number	3869918
Entity Type	Limited Liability Company
Status	Active
Citizenship	Foreign
Entity Creation Date	03/06/2009
Effective Date	03/06/2009
State Of Inc	DE
Address	%COGENCY GLOBAL INC. Dauphin

#### Filed Documents

The information presented below is for your reference. To place an order you will need to log in. If you do not have a PENN File account, you may register for an account by clicking here (/Account/Register\_account).

Show 25 entries

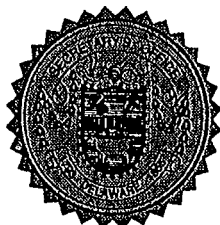
Filter Records

Select	Date	Document	Pages	Plain Copy Quantity#	Price	Certified Copy Quantity#	Certified Copy Price	Microfilm #	Microfilm Start	Microfilm End	Line Total
<input type="checkbox"/>	03/06/2009	Application for Registration 1	2	1	\$3.00	0	\$40.00				

# Delaware

*The First State*

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "TFS ENERGY SOLUTIONS, LLC", FILED IN THIS OFFICE ON THE THIRD DAY OF MARCH, A.D. 2006, AT 4:28 O'CLOCK P.M.



4119797 8100

060214359

*Harriet Smith Windsor*

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 4566951

DATE: 03-03-06



State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 05:06 PM 03/03/2006  
FILED 04:28 PM 03/03/2006  
SRV 060214359 - 4119797 FILE

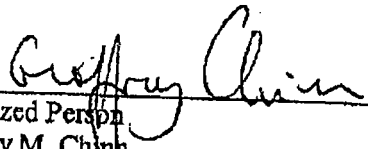
STATE OF DELAWARE  
LIMITED LIABILITY COMPANY  
CERTIFICATE OF FORMATION

**First:** The name of the limited liability company is TFS Energy Solutions, LLC.

**Second:** The address of its registered office in the State of Delaware is 615 South DuPont Highway in the City of Dover, County of Kent, 19901. The name of its registered agent at such address is National Corporate Research, Ltd.

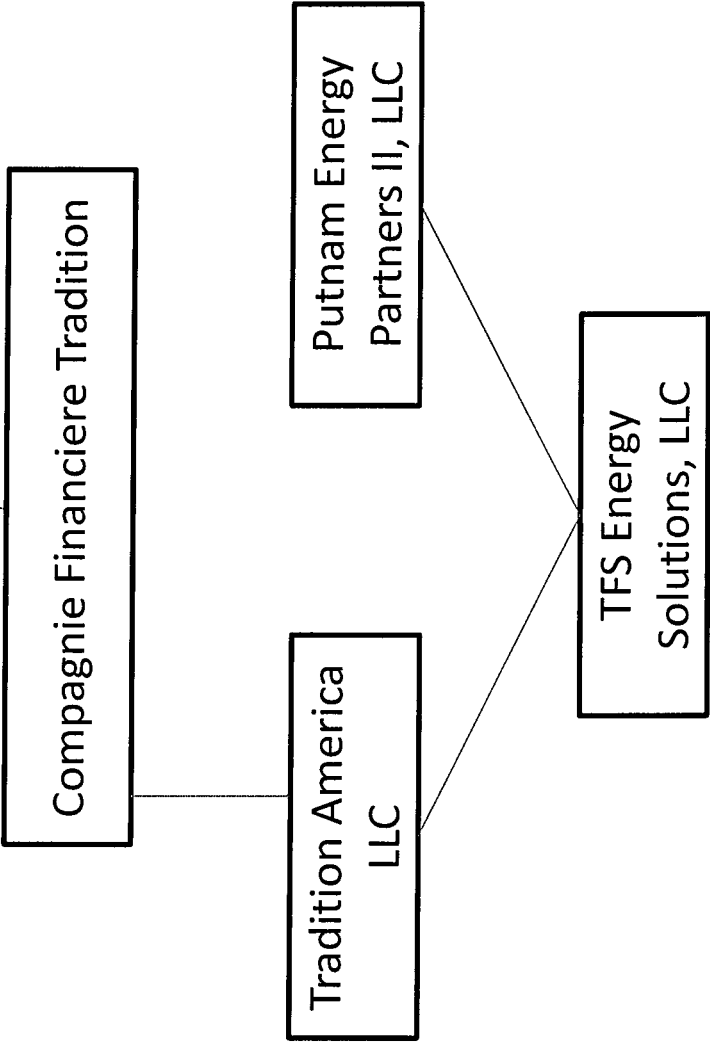
**In Witness Whereof,** the undersigned has executed this Certificate of Formation this first day of March, 2006

By:

  
Authorized Person

Name: Geoffrey M. Chish

TFS ENERGY SOLUTIONS, LLC  
CORPORATE STRUCTURE





# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
11/20/2020

EXHIBIT 7C

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

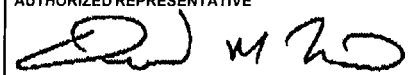
<b>PRODUCER</b> Arthur J. Gallagher Risk Management Services, Inc. 200 Jefferson Park Whippany NJ 07981	<b>CONTACT NAME:</b> PHONE (A/C, No, Ext): 800-350-8005      FAX (A/C, No): 973-921-2876 E-MAIL ADDRESS:	
	<b>INSURER(S) AFFORDING COVERAGE</b> <b>NAIC #</b>	
<b>INSURED</b> Tradition America Holdings, Inc. 32 Old Slip Floor 28 New York NY 10005	<b>INSURER A:</b> Federal Insurance Company      20281	<b>INSURER B:</b> Vigilant Insurance Company      20397
	<b>INSURER C:</b> Great Northern Insurance Company      20303	<b>INSURER D:</b>
	<b>INSURER E:</b>	
	<b>INSURER F:</b>	

**COVERAGES**      **CERTIFICATE NUMBER:** 546247628      **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVP	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
C	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			35363973	7/1/2020	7/1/2021	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 \$
A	<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY			73520809	7/1/2020	7/1/2021	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> DED <input checked="" type="checkbox"/> RETENTION \$ 10,000			79774098	7/1/2020	7/1/2021	EACH OCCURRENCE \$ 20,000,000 AGGREGATE \$ 20,000,000 \$
B	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y/N If yes, describe under DESCRIPTION OF OPERATIONS below		N/A	71642453	6/1/2020	6/1/2021	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

<b>CERTIFICATE HOLDER</b>  Evidence of Insurance	<b>CANCELLATION</b>  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE 

## EXHIBIT 8: EXPERIENCE, PLAN AND STRUCTURE

### Experience

Applicant is one of the world's largest and most experienced full-service energy management consultants serving more than 1000 commercial, industrial and governmental clients ranging from Fortune 500 global companies to medium-sized businesses to local municipalities. Applicant advises its clients on trends affecting the energy markets and assists them in managing their energy price risk exposure and in developing and implementing risk management strategies to control and reduce their electricity and natural gas expenditures. Applicant provides energy management solutions (which include supply management and procurement; data management and reporting; and market research and intelligence) to its customers.

Applicant has managed over 90 billion kWh in annual electricity usage and more than \$15 billion in electricity and natural gas spend.

Applicant is part of the Tradition Group, a leading institutional broker of financial and commodity products. The Tradition Group employs over 2,400 people in 28 countries around the world and is publicly listed on the Swiss Stock Exchange (CFT).

Applicant has 65 full-time employees and is headquartered in Stamford, CT.

More information can be found at [www.traditionenergy.com](http://www.traditionenergy.com)

### Plans

Applicant was formed for the purpose of carrying out the business of the provision of retail energy brokerage services and activities reasonably related thereto. Applicant provides energy management solutions (which include supply management and procurement; data management and reporting; and market research and intelligence) to its customers. Applicant works with its customers to solicit bids from energy suppliers; assists in the selection of an energy supplier; and manages its customers' continuing energy costs and needs.

Applicant does not intend to take title to electricity in the State of Pennsylvania and intends to follow its existing business model in providing services in Pennsylvania. Applicant plans to contract with its customers to solicit bids from energy suppliers; assist in the selection of an energy supplier and manage its continuing energy costs and needs. Applicant does not intend to provide billing statements to customers. Applicant has established a toll-free number to handle customer inquiries and complaints.

### Licenses

Attached is a list of Applicant's energy licenses.

Besides the cancellation of its Pennsylvania license due to a mailing error, Applicant has never had an issue or complaint with any of its licenses. There have not been any regulatory actions taken against the Applicant in any jurisdiction.

**TFS ENERGY SOLUTIONS, LLC STATE LICENSES**

<b>State</b>	<b>License No.</b>	<b>Type of License</b>	<b>Docket Number</b>
Connecticut	06-07-21	Aggregator	
Delaware	7676	Broker	09-444
District of Columbia	GA-09-3-7 EA-09-4-6	Broker	15880
Illinois	09-0468	Agents, Brokers and Consultants (ABC)	
Maine	2006-00316	Electricity Aggregator/Broker	2006-00316
Maryland	IR-918 IR-982	Electricity Broker Gas Aggregator/Broker	102044 and 103064 104643
Massachusetts	EB-082 RA-048	Electric Brokers License Nat. Gas Retail Agent	EB-082 RA-048
New Hampshire	DM 21-013 DM 15-05	Electric Aggregator Natural Gas Aggregator	DM 21-013 DM 13-179
New Jersey	EA-0064 PA-0061	Energy Agent Private Aggregator	
Ohio	09-177E(6)  13-322G(3)	Electricity Aggregation and Power Broker Services  Natural Gas Aggregation and power Broker Services	09-9970-EL-AGG  13-1751-GA-AGG
Pennsylvania	A-2009-2132890 CANCELLED	Electricity Broker/Marketer and Consultant	A-2009-2132890

TFS ENERGY SOLUTIONS, LLC STATE LICENSES

	A-2013-2368622 D-96-6	Natural Gas Supplier Non Regulated Power Producer	A-2013-2368622 D-96-6
Rhode Island			
Texas	EL060028 BR190190	Class I, Class IIA Aggregator Broker	32834, 35104, 39007
Virginia	A-30	Electric Aggregation Services Natural Gas Aggregation Services	PUE-2009-00119
Ontario	ER-2018-0265	Electricity Retailer	ER-2018-0265

**EXHIBIT 8E:**

**Alan Kurzer, Chief Executive Officer**

Alan Kurzer is the founder and CEO of TFS Energy Solutions, LLC, d/b/a Tradition Energy and co-founder and President of TFS Energy, LLC, the institutional brokerage affiliate of Tradition Energy. Mr. Kurzer has over 35 years of energy industry experience in the global physical and derivative markets for crude oil, refined products, natural gas and electricity. Prior to merging the SDI Energy Group with Tradition to form TFS Energy, LLC, in 2000, he spent over 12 years running SDI's predecessor, Gerald Energy and was CEO of Gerald Commodities, a futures clearing firm. Mr. Kurzer began his career with Caltex Petroleum (Chevron/Texaco) where he held a variety of supply and trading positions in New York, Singapore and Dallas. Mr. Kurzer holds a B.A. from Binghamton University and an M.B.A. from Cornell University.

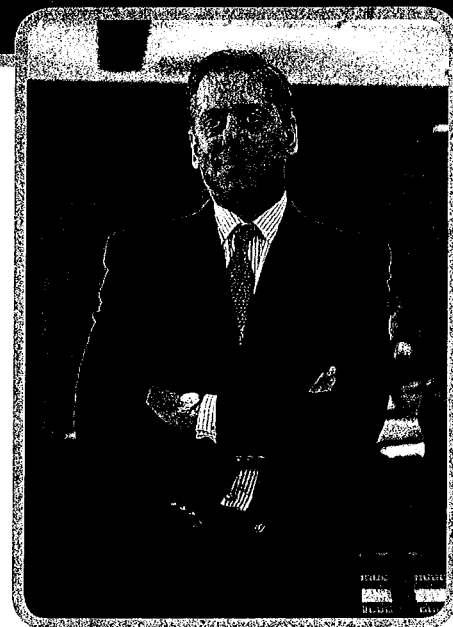
**Further experience is attached.**

## Alan Kurzer

### President

#### TFS Energy, L.L.C. and Tradition Energy

Alan Kurzer is president of TFS Energy, L.L.C., a leading institutional wholesale energy brokerage firm offering over-the-counter (OTC) and exchange-traded execution and clearing of physical and derivative financial instruments across the full array of energy products including electricity, natural gas, crude oil and refined products, coal, emissions and environmental products and weather derivatives. Mr. Kurzer is also president of Tradition Energy, the energy advisory subsidiary of TFS Energy, dedicated to providing commercial and industrial customers with custom tailored energy procurement solutions that allow them to benefit from the deregulation of energy markets. Mr. Kurzer was named president when the prior energy brokerage group he had founded merged with Traditional Financial Services, Inc. to form TFS Energy in 2000.



As head of one of the energy industry's most successful energy brokerage firms, Mr. Kurzer brings significant experience in energy futures and OTC brokering to his leadership of TFS and Tradition Energy. TFS Energy has been named "Energy Broker of the Year" in the prestigious Commodities Now 2005 and 2006 rankings. In addition, TFS Energy globally is proud to have been awarded Number One rankings 67 times over the past 10 years by both Energy Risk and Environmental Finance magazines.

Prior to the formation of TFS Energy and Tradition Energy, Mr. Kurzer served as senior vice president and managing director of the SDI Energy Group, which had been created in 1998 as a result of a joint venture with the former Gerald Energy Group and Sakura Dellsher, Inc. At that time, Mr. Kurzer was the president and CEO of Gerald Commodities, an institutional futures brokerage and clearing firm specializing in energy, metals, financial and soft commodities. For well over a decade prior to that, he ran the Gerald Energy group and served in various senior positions responsible for global energy futures and OTC brokering, as well as sales, marketing and business development activities. In the early to mid-1980s, Mr. Kurzer held a variety of crude oil and refined products supply and trading positions at Caltex Petroleum Corp. in New York, Singapore and Dallas.

Kurzer was a founding member and is Vice President of the Energy Brokers Association (EBA), the energy industry trade association of brokerage companies and exchanges. He holds a B.A. from State University of New York at Binghamton and a M.B.A. from Cornell University.




**Energy Business**

Award Winner 2006

Award Winner 2005

Energy Broker  
of the Year

 **TFS Energy**



# **Brian McDermott**

272 Rivergate Dr  
Wilton, CT 06897  
(203) 517-7247  
BriMcD10@yahoo.com

## **EXPERIENCE**

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### **Tradition Energy**

*Executive Director of Operations*

**Stamford, CT**

*Jul 2006 - Present*

- Head of Operations for Tradition Energy, a global energy management advisory firm. Overseeing all operational and fulfillment services including the Pricing and Sourcing, Client Services, Account Management Services, Research and Recruiting. In addition, coordinate all Legal, Regulatory, Finance and IT requirements.

### **TFS Energy**

*Sr. Broker*

**Stamford, CT**

*Aug 2000 – Jul 2006*

- Natural gas broker of financial swaps, basis, and physicals in the U.S. and Canadian markets. Compliance Officer, responsible for keeping the firm in compliance of the rules and regulations of all governing bodies, including the SEC and FERC.

### **Sakura Dellsher Inc**

*Sr. Broker*

**Greenwich, CT**

*Jan 1998 – Aug 2000*

- Natural gas broker of financial swaps, basis, and physicals in the west U.S., and Canadian markets.

### **Gerald Energy**

*Sr. Broker*

**New York City, NY**

*May 1997 – Jan 1998*

- Natural gas broker on both the floor of the New York Mercantile Exchange (NYMEX) and the Over The Counter (OTC) markets.

## **EDUCATION**

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### **STATE UNIVERSITY OF NEW YORK AT ALBANY**

**Albany, NY**

*Bachelor of Arts (B.A.) Psychology (May 1997)*