



VIA E-FILE

November 16, 2023

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Arbor Energy Brokerage Services LLC
Application For Electric Generation Supplier License - Data Request
Docket No.: A-2023-3043382

Dear Secretary Chiavetta:

Attached for filing is Arbor Energy Brokerage Services LLC's second response to the Data Request received on October 31, 2023.

Please note that copies of the bank and treasury account statements in response to Question 2 of the Data Request have been sent via Federal Express for confidential filing.

If you have any questions regarding the attached, please contact me.

Thank you,

A handwritten signature in blue ink that reads "Krista Glentzer". The signature is written in a cursive, flowing style.

Krista Glentzer
Regulatory Manager

cc: Andrew Meyer - Arbor Energy Brokerage Services
Jeff Mahoney - Arbor Energy Brokerage Services



VIA ELECTRONIC FILING

November 15, 2023

RE: DR 3043382 – Application of Arbor Energy Brokerage Services LLC for an Electric Generation Supplier License in Pennsylvania Data Request

To whom it may concern:

I am in receipt of the Data Request that was filed on October 31, 2023. My response to each interrogatory is included below.

Q1. Reference Application, Section 1.a, Identity of Applicant – The Applicant stated that its web address is: www.joinarbor.com. This website appears to be a site for electricity shopping, and it lists various states along with license numbers at the very bottom for its web pages. Among this list is PA 4243413, which makes it appear that the company is already licensed and doing business in Pennsylvania. If the company is already doing business in Pennsylvania, Section 4.a of this Application needs to be resubmitted. If this is an affiliate of the company, then Sections 3.a and b need to be resubmitted. Alternatively, please provide an explanation.

A1. Arbor is currently a user of a third-party brokerage “platform”, NRG Kiosk d/b/a Power Kiosk (“NRG”). NRG has built an innovative brokerage “platform” that empowers its users (like Arbor) to increase access to the competitive energy markets, utilizing their software, supplier partnerships and integrations, and regulatory licenses, while ensuring compliance with strict internal policies and enforcement mechanisms. We are seeking our own license in order to work directly with energy suppliers. On the advice of regulatory counsel, and to be transparent about our current operating model, pending our own brokerage licenses, we included NRG’s license information on our website. Once we secure our own license in a given state, we will remove NRG’s license information and include our own.

Q2. Reference Application, Section 7.a, Financial Fitness – Applicant failed to provide sufficient documentation for proof of financial fitness. Please provide financial documents in the name of the applicant, such as bank account statements for a minimum of three months. If applicant is receiving funding from its parent organization, please provide a signed attestation that the parent organization will make funds available with amounts, terms and interest rates indicated.

A2. Applicant together with its parent company, Arbor Energy Holdings Inc. (“Arbor”), currently utilize unified financial accounts. Attached you will find bank (Bank of America), treasury (Merrill Lynch) account statements showing Arbor’s current cash reserves, and a signed attestation letter outlining Arbor’s commitment to the financial support of the Applicant. Arbor anticipates reaching profitability in 2024, once it has secured brokerage licenses and is therefore able to scale its operations. In addition, existing and other leading investors have

expressed significant interest in capitalizing Arbor to accelerate growth and product development.

Q3. Reference Application, Section 8.a, Appendix Q – Please provide copies of licenses in other jurisdictions.

A3. At the time of the application filing, Arbor Energy Brokerage Services LLC (“AEBS”) had filed for, but not yet obtained licenses in IL, MA, MD, ME, NH, and OH. As of the date of this response, AEBS has obtained licenses in OH and NH which are included in Appendix B of this response. AEBS’s parent company, Arbor Energy Holdings Inc (“AEH”) has obtained a license in Texas which is included in Appendix B of this response. All other licenses referenced in Appendix Q of the original application correspond with the partnership between Arbor and NRG Kiosk d/b/a Power Kiosk and are held by Power Kiosk.

Q4. Reference Application, Section 8.a, Appendix Q – Please define “team member”, if these are affiliated entities, please resubmit Section 3.a of the application.

A4. For the purposes of the initial filing, “team member” refers to the two employees of Arbor Energy Brokerage Services LLC, Andrew Meyer, CEO and Jeff Mahoney, Head of Brokerage.

If you have any additional questions, do not hesitate to contact me at (281) 783-9005 or via email at jeff@joinarbor.com.

I, Jeff Mahoney, 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).

Sincerely,



Jeff Mahoney
Head of Brokerage



ATTESTATION OF FINANCIAL SUPPORT

Date: November 14, 2023

As the Chief Executive Officer of Arbor Energy Holdings Inc. (“Arbor”), I hereby issue this attestation regarding the financial support Arbor is extending to its wholly owned subsidiary, Arbor Energy Brokerage Services LLC (“Applicant”).

Attestation of Financial Support:

As a wholly owned subsidiary of Arbor, Applicant will have access to Arbor funds to the extent required to operate consistent with the companies’ shared financial and operating plans. Arbor’s current financial position is detailed in the financial account statements submitted confidentially with Applicant’s application.

Terms of Access:

- 1. Shared Capitalization:** As a wholly owned subsidiary of Arbor, the Applicant has not and does not intend to seek capital from third-parties other than Arbor. Therefore, Arbor is committed to capitalizing Applicant to establish its initial operations.
- 2. As-Needed Cash Draw:** Arbor and Applicant have established a financial and operating plan under which Arbor shall make available to Applicant sufficient funds to operate as intended in the Pennsylvania market, under terms and conditions that are typical of a parent-subsiary relationship.
- 3. Repayment:** Through normal business operations, Applicant is anticipated to generate revenue, which shall be used to repay Arbor for such funds. Under this financial arrangement, both Applicant and Arbor anticipate generating gross margins to support their shared business success.

Signatories:

This document is executed by the undersigned as a true representation of the intent and legal commitment of Arbor and Applicant.

Sincerely,

A handwritten signature in black ink that reads "Andrew Meyer".

Andrew Meyer, CEO
Arbor Energy Holdings Inc.

A handwritten signature in black ink that reads "Jeff Mahoney".

Jeff Mahoney, Head of Brokerage
Arbor Energy Brokerage Services LLC

STATE OF NEW HAMPSHIRE

COMMISSIONER
Jared S. Chicoine

DEPUTY COMMISSIONER
Christopher J. Ellms, Jr.



DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-3670

FAX No. 271-1526

Website:
www.energy.nh.gov

October 3, 2023

Arbor Energy Brokerage Services, LLC
Andrew Meyer, CEO
2418 Spring Lane #5524
Austin, TX 78763

Re: **REG 2023-082** - Arbor Energy Brokerage Services, LLC (Arbor Energy)
Initial Registration as Provider of Electric Aggregation Service

Dear Mr. Meyer:

On September 27, 2023, Arbor Energy Brokerage Services, LLC submitted an application to the Department of Energy (Department) to register as a provider of electric aggregation service.

Review of the application determined it is complete and meets the requirements for approval under Puc 2003, Registration and Assessment Requirements, and Puc 2006.02, Information Required for Initial and Renewal Registration of Aggregators.

Under RSA 374-F:7, as amended effective July 1, 2021, the Department is now responsible for registration and regulation of electric aggregators and competitive electric power suppliers and for the adoption of related rules. The Department therefore is authorized to enforce the relevant provisions of the Puc 2000 rules, including those related to aggregator registration. *See* RSA 12-P:14.¹

Arbor Energy's application for registration is hereby approved, effective as of October 9, 2023, under Puc 2003.05(g)(1). The registration is for a term of two years and expires at the close of business on October 9, 2025. Pursuant to Puc 2003.06(a), you must submit your next renewal application at least 60 days prior to the expiration of the approved registration term, on or before August 10, 2025.

¹ On July 1, 2021, the Department came into existence and many functions previously performed by the Public Utilities Commission (PUC) were transferred to the Department. Under RSA 12-P:14, "[e]xisting rules, orders, and approvals of the [PUC] which are associated with any functions, powers, and duties, transferred to the [Department] pursuant to RSA 12-P:11 or any other statutory provision, shall continue in effect and be enforced by the commissioner of the [Department] until they expire or are repealed or amended in accordance with applicable law." *See* 2021 N.H. Laws Chapter 91 (House Bill 2-FN-A-Local).

Please be aware that registered providers of electric aggregation service are subject to specific requirements contained in N.H. Code Admin. Rules Puc 2000 – Competitive Electric Power Supplier and Aggregator Rules. These rules are available at:

<http://www.puc.nh.gov/Regulatory/Rules/PUC2000.pdf>.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jared S. Chicoine", with a long horizontal line extending to the right.

Jared S. Chicoine
Commissioner



**Public Utilities
Commission**

Jenifer French, Chair

Commissioners

Daniel R. Conway
Dennis P. Deters
Lawrence K. Friedeman
John D. Williams

Competitive Retail Electric Service Provider Certificate

Certified Entity:

Arbor Energy Brokerage Services LLC

2418 Spring Ln #5524

Austin, TX 78763

Certificate Number: **23-125153E**

Effective Date: October 09, 2023

Expiration Date: October 09, 2025

Issued Pursuant to Case Number(s):

23-0857-EL-AGG

The above referenced entity is hereby certified to provide competitive retail electric **Aggregator;Power Broker** services within the State of Ohio.

The certification of competitive retail electric service providers is governed by Chapters 4901:1-24 and 4901:1-21 of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code. This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

The certified entity is subject to all rules and regulations of the Public Utilities Commission of Ohio now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: **09 day of October, 2023.**



By Order of
The Public Utilities Commission of Ohio

Tanowa M. Troupe, Secretary
Michelle Green, Acting Secretary
Gail Young, Acting Secretary
Susan Patterson, Acting Secretary

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on
10/20/2023 1:50:43 PM**

in

Case No(s). 23-0857-EL-AGG

Summary: Certificate No. 23-125153E issued and electronically filed by Ms.
Melissa M. Scarberry on behalf of PUCO Staff.



Public Utility Commission of Texas

Broker Report

ARBOR ENERGY HOLDINGS INC BR230078

Type:	Corporation
Date Registered:	3/6/2023

DBA Names:

No DBA Records

Company Information	
Customer Types:	
Customer Details:	

Contact Information

Company / Physical (Mailing Address)

ARBOR ENERGY HOLDINGS INC
2418 SPRING LN #5524
AUSTIN, TX 78763
Email: legal@joinarbor.com
Phone: 512-222-8192

Authorized Rep

ARBOR ENERGY HOLDINGS INC
ANDREW MEYER
CEO
2418 SPRING LN #5524
AUSTIN, TX 78763
Email: andrew@joinarbor.com
Phone: 512-222-8192

Contact (Complaint)

ARBOR ENERGY HOLDINGS INC
ANDREW MEYER
CEO
2418 SPRING LN #5524
AUSTIN, TX 78763
Email: andrew@joinarbor.com
Phone: 512-222-8192

Docket/Project/Control Numbers

49779-3151

Type: PROJECT
Open Date: 1/9/2023
Close Date: 3/6/2023
Filings: New
Note: INITIAL BROKER REGISTRATION APPLICATION

End Report

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Arbor Energy Brokerage Services LLC, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) electric broker / marketer 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:

Arbor Energy Brokerage Services LLC
2418 Spring Lane #5524
Austin, TX 78763
Web Address: www.joinarbor.com
Phone: (888) 836-3145

- 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 St.
Harrisburg, PA 17101

- 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 and future inquiries should be addressed.

NOTE: To ensure timely receipt of regulatory information, a contact employed directly by the Applicant, and not a consultant, is preferred.

Jeff Mahoney
Head of Brokerage
2418 Spring Lane #5524
Austin, TX 78763
Phone: (281) 783-9005
Email: regulatory@joinarbor.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.

Applicant is not using an attorney.

- 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.

Jeff Mahoney
Head of Brokerage
2418 Spring Lane #5524
Austin, TX 78763
Phone: (512) 222-8192
Fax: (512) 661-0400
Email: support@joinarbor.com

Andrew Meyer
Chief Executive Officer
2418 Spring Lane #5524
Austin, TX 78763
Phone: (512) 222-8192
Fax: (512) 661-0400
Email: support@joinarbor.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.

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):

- See Appendix N - Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- See Appendix O - Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
- Give name and address of officers.

Andrew Meyer
Chief Executive Officer
2418 Spring Lane #5524
Austin, TX 78763

Jeff Mahoney
Head of Brokerage
2418 Spring Lane #5524
Austin, TX 78763

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.

While the Applicant does not have any corporate affiliates other than its parent company Arbor Energy Holdings Inc. (collectively, "Arbor"), we acknowledge a contractual relationship with Power Kiosk LLC ("Power Kiosk"). Power Kiosk is a duly licensed electricity broker operating within the state [A-2018-3000981]. Arbor is a user of Power Kiosk's platform for certain business operations within Pennsylvania. This arrangement does not constitute a direct corporate affiliate relationship as per the typical legal definition, but out of an abundance of transparency, we wanted to recognize the relevance and importance of this relationship in our application and future operations within the state.

- 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 that have done business.

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)*:

- 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 is a wholly owned subsidiary of Arbor Energy Holdings Inc ("Arbor"). Arbor was founded in 2019 as a digital home energy advisor, with the purpose of lowering the cost of home energy for people and the planet. Arbor's innovative digital engagement platform helps consumers identify and adopt home energy products and services that save them money and reduce their environmental impact. To date, Arbor has helped consumers find more affordable and/or renewable energy supply options in deregulated markets by partnering with existing licensed electricity brokers such as Power Kiosk LLC. Having validated an ability to cost-effectively acquire customers, with industry-leading customer satisfaction, Applicant now seeks an electric broker license to unlock more value for end customers and supply partners.

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)
- Large Commercial Customers - (Over 25 kW)
- Industrial Customers
- Governmental Customers
- All of above
- Other (Describe):
- Residential and Small Commercial Customers in a Mixed Meter Capacity -

This customer class reflects situations in which a large commercial, industrial, and/or governmental customer account also contains features of residential and/or small commercial customers. In this instance, the residential and/or small commercial portion must be an incidental portion of the larger account. **This customer class alone does not allow marketing targeted directly to residential and/or small commercial customers.** Further information may be found in the Requirements Applicable to Mixed Meter Scenarios Secretarial Letter served March 25, 2011, at Docket No. M-2009-2082042.

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

Applicant proposes to actively market within the Commonwealth upon Commission approval of this application.

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 the applicant, nor any affiliate or predecessor, nor any 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. **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 has no actions of complaints to list.

- c. **SUMMARY:** Provide a statement as to the resolution or present status of any proceedings or actions listed above. Additionally, provide details of any actions the applicant has undertaken that will prevent the items listed above from occurring if licensed in Pennsylvania.

Not applicable.

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.

<p>Citizens' Electric Company: Citizens' Electric Company Attn: EGS Coordination 1775 Industrial Boulevard Lewisburg, PA 17837</p>	<p>Duquesne Light Company: Regulatory Affairs Duquesne Light Company 411 Seventh Street, MD 16-4 Pittsburgh, PA 15219</p>
<p>Met-Ed, Penelec, and Penn Power: Legal Department First Energy 2800 Pottsville Pike Reading PA, 19612</p>	<p>PECO: Manager Energy Acquisition PECO Energy Company 2301 Market Street Philadelphia, PA 19101-8699</p>
<p>Pike County Light & Power Company: Vice President – Energy Supply Corning Natural Gas Holding Corporation 330 West William Street Corning, NY 14830</p>	<p>PPL: Office of General Counsel Attn: Kimberly A. Klock PPL Two North Ninth Street (GENTW3) Allentown, PA 18101-1179</p>
<p>UGI: UGI Utilities, Inc. Attn: Rates Dept. – Choice Coordinator 1 UGI Drive Denver, PA 17517</p>	<p>Wellsboro Electric Company: Wellsboro Electric Company Attn: EGS Coordination 33 Austin Street P. O. Box 138 Wellsboro, PA 16901</p>
<p>West Penn Power: Legal Department West Penn Power d/b/a Allegheny Power 800 Cabin Hill Drive Greensburg, PA 15601-1689</p>	

7. FINANCIAL FITNESS

a. **FINANCIAL SECURITY:** 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 will not take title to electricity and will not pay electricity bills on behalf of its customers.

Original bond is being filed separately.

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, EGS suppliers should email pc-puc-tus-energy@pagov.onmicrosoft.com or call (717)783-5242 to determine the appropriate bonding amount based on a percentage of suppliers gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. Once the amount has been determined, suppliers 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 (preferred), 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 statements (3-12 recent consecutive months), tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

See Appendix P

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.

Applicant is operating as an electric broker / marketer only.

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

Applicant does not currently bill its retail energy customers for its services and will not be paid by or enter into supply contracts with its customers. The fees received by Applicant are paid directly by the EGS.

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.

Andrew Meyer
Chief Executive Officer
2418 Spring Lane #5524
Austin, TX 78763
Phone: (512) 222-8192
Fax: (512) 661-0400
Email: support@joinarbor.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. Submitting N/A on either the Sales Tax License Number or the Employer ID Number (items 7A and 7B) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Item 7A on the Tax Certification Statement is 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.

See Appendix Q

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 is devoted to maintaining transparency, fairness, and ethical integrity in all business operations, particularly in marketing. All marketing communications, whether disseminated via Applicant's website or advertisements on social media will be accurate, clear, and non-misleading, with all claims substantiated and relevant disclaimers prominently displayed. A stringent monitoring and oversight mechanism involving Officers and senior leadership is in place to regularly review marketing content and strategies, promptly address deviations, and implement corrective measures.

- 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.

Andrew Meyer, CEO

Jeff Mahoney, Head of Brokerage (See Appendix R for resume)

- 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.

All Applicants MUST include a Commission issued Docket Number in their publications. Docket Numbers are issued to new applicants when an application packet is submitted to the PUC's Secretary's Bureau. **Newspaper publications published without a Commission issued Docket No. will be rejected.** For more information, see 52 Pa. Code § 54.35.

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.

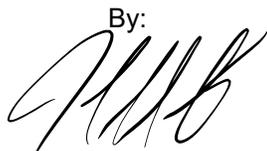
The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and **must be supplied to the Commission before the applicant is licensed.**

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News or Philadelphia Inquirer	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

(Newspaper Publication Templates are provided at Appendices K and L)

13. SIGNATURE

Applicant: Arbor Energy Brokerage Services LLC

By:

Jeff Mahoney

Title: Head of Brokerage

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: Arbor Energy Brokerage Services LLC

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

Applicant's Use

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

State of TEXAS :

ss.

County of FORT BEND :

Jeff Mahoney, Affiant, being duly affirmed according to law, deposes and says that:

He is the Head of Brokerage of Arbor Energy Brokerage Services LLC;

That he is authorized to and does make this affidavit for said Applicant;

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

That the Applicant herein, Arbor Energy Brokerage Services 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, Arbor Energy Brokerage Services 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.

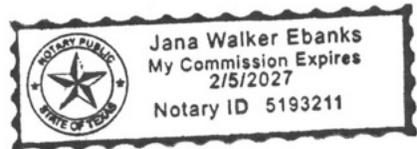
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Handwritten Signature]
Signature of Affiant

Sworn and subscribed before me this 8th day of September, 2023

[Handwritten Signature]
Signature of official administering oath

My commission expires 2-5-27



Appendix B

OPERATIONS AFFIDAVIT

State of TEXAS :

: SS.

County of FORT BEND :

Jeff Mahoney, Affiant, being duly affirmed according to law, deposes and says that:

He is the Head of Brokerage of Arbor Energy Brokerage Services LLC;

That he is authorized to and does make this affidavit for said Applicant;

That Arbor Energy Brokerage Services 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 Arbor Energy Brokerage Services 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 Arbor Energy Brokerage Services 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.

That ArborEnergy Brokerage Services 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.



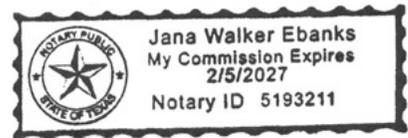
Signature of Affiant

Sworn and subscribed before me this 8th day of September, 20 23



Signature of official administering oath

My commission expires 2-5-27



Appendix C

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

Example CERTIFICATE OF SERVICE

On this the 28 day of September 2023, 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 or a USB flash drive, 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

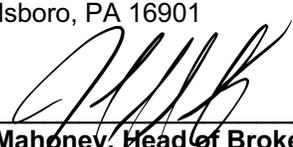
Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

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



Jeff Mahoney, Head of Brokerage

Appendix D

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

Electric Generation Supplier License Financial Instruments

Bonds or other financial instruments submitted in order to satisfy the licensing process must comply with the following:

The financial instrument, in the amount of \$250,000 for suppliers/aggregators or \$10,000 for brokers/marketers, should name the Pennsylvania Public Utility Commission as the obligee or beneficiary, and should contain the following unmodified language:

...“ in accordance with Section 2809(c)(1)(i) of the Public Utility Code, 66 Pa. C.S. 2809(c)(1)(i), to assure compliance with applicable provisions of the Public Utility Code, 66 Pa. C.S. 101, et seq. and the rules and regulation of the Pennsylvania Public Utility Commission by the Principal as a licensed electric generation supplier; to ensure the payment of Gross Receipts Tax as required by Section 2810 of the Public Utility Code, 66 Pa. C.S. 2810; to ensure the payment of annual fees as authorized by Act 155 of 2014; to adhere to the requirements of the Alternative Energy Portfolio Standards Act, 73 P.S. § 1648.1 et seq. and 52 Pa.Code 75.1 et seq.; and to ensure the supply of electricity at retail in accordance with contracts, agreements or arrangement. Payment of claims shall have the following priority: (I) The Commonwealth of Pennsylvania; (II) Electric Distribution Companies for the reimbursement of Gross Receipts Tax; and (III) Private Individuals. Proceeds of the bond may not be used to pay any penalties or fines levied against the Principal for violations of the law, or for the payment of any other tax obligations owed to the Commonwealth of Pennsylvania.”

The **ORIGINAL** financial instrument must be submitted, preferably by overnight delivery, to the Secretary of the Pennsylvania Public Utility Commission, 400 North Street, Keystone Building, Harrisburg, PA 17120. If the application is approved, the entry date of the Commission’s Order will be the effective date of the license.

Applicants should CHOOSE ONE financial instrument template from Appendices E through H.



Pennsylvania Department of State
Bureau of Corporations and Charitable Organizations
PO Box 8722 | Harrisburg, PA 17105-8722
T: 717.787.1057
dos.pa.gov/BusinessCharities

September 6, 2023

Cogency Global Inc.
600 NORTH SECOND STREET
HARRISBURG, PA 17101

Entity Name: Arbor Energy Brokerage Services LLC
Entity File Date: September 6, 2023
Entity Number: 0013570673
Filing Type: Foreign Limited Liability Company

The Bureau of Corporations and Charitable Organizations is happy to send your filed document. The Bureau is here to serve you and we would like to thank you for doing business in Pennsylvania.

Thank you for registering with the Department of State to do business in Pennsylvania. Like many other businesses, you may have employees, sell taxable products, or provide a taxable service to consumers in Pennsylvania. Please visit www.pa100.state.pa.us to register for business taxes with the Department of Revenue and the Department of Labor and Industry. You may also visit www.Business.pa.gov to find resources for businesses through all stages of development.

Beginning in 2025, annual reports are required for all domestic filing entities, limited liability general partnerships and registered foreign associations. More information will be forthcoming from the Bureau. However, to ensure that you receive notice of how and when to make annual reports, keep all information on file with the Bureau up-to-date, particularly registered office address.

Delaware

The First State

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 FORMATION OF "ARBOR ENERGY BROKERAGE SERVICES LLC", FILED IN THIS OFFICE ON THE FIFTEENTH DAY OF AUGUST, A.D. 2023, AT 5:19 O`CLOCK P.M.




Jeffrey W. Bullock, Secretary of State

7624372 8100
SR# 20233257848

Authentication: 203971928
Date: 08-15-23

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

CERTIFICATE OF FORMATION

OF

ARBOR ENERGY BROKERAGE SERVICES LLC

(pursuant to the Delaware Limited Liability Company Act, 6 Del. C. § 18-101 *et seq.*)

1. The name of the limited liability company formed hereby is: Arbor Energy Brokerage Services LLC (the “**Company**”).

2. The address of the Company’s registered office in the State of Delaware is 850 New Burton Road, Suite 201, in the City of Dover, County of Kent 19904. The name of the registered agent at such address is Cogency Global Inc.

IN WITNESS WHEREOF, the undersigned authorized person has executed this Certificate of Formation this 15th day of August 2023.

/s/ Andrew Meyer

Andrew Meyer

Authorized Person

88591-5888 09/06/2023 18:44 AM Received by Pennsylvania Department of State

DSCB:15-412 - 2

5. The (a) address of the association's proposed registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) OR (b) - not both.

(a) _____
 Number and street City OR State Zip County

(b) c/o: COGENCY GLOBAL INC. Dauphin
 Name of Commercial Registered Office Provider County

6. Check one of the following:

- The association may not have series.
- The association may have one or more series.

7. Effective date of registration of foreign association (check, and if appropriate complete, one of the following):

- The Foreign Registration Statement shall be effective upon filing in the Department of State.
- The Foreign Registration Statement shall be effective on: _____ at _____
 Date (MM/DD/YYYY) Hour (if any)

8. To be completed by Limited Liability Companies only. Check, and if appropriate complete, one of the following:

- The association is a limited liability company which is not organized to render any of the below professional service(s).
- The association is a restricted professional limited liability company organized to render one or more of the following professional service(s): (If this box is checked, one or more of the fields below must be checked.)

<input type="checkbox"/> Chiropractic	<input type="checkbox"/> Dentistry	<input type="checkbox"/> Law	<input type="checkbox"/> Medicine and surgery
<input type="checkbox"/> Optometry	<input type="checkbox"/> Osteopathic medicine and surgery	<input type="checkbox"/> Podiatric medicine	<input type="checkbox"/> Public accounting
<input type="checkbox"/> Psychology	<input type="checkbox"/> Veterinary medicine		

IN TESTIMONY WHEREOF, the undersigned association has caused this Foreign Registration Statement to be signed by a duly authorized representative thereof this _____ day of _____ August, 20 23.

Arbor Energy Brokerage Services LLC
 Name of Association

DocuSigned by:
Andrew Meyer
 DFAE0422D00D4EA

Andrew Meyer, Authorized Representative
 Title

APPENDIX Q TECHNICAL FITNESS

Applicant, although presently in the initial phases of acquiring licenses as an electricity broker, including a pending application with the Public Utilities Commission of Ohio, is a wholly owned subsidiary of Arbor Energy Holdings Inc (“Arbor”). This parent entity is a registered electric broker in Texas, holding Registration Number BR230078 since March 6, 2023, under Case No. 49779-3151. Arbor exemplifies versatility, serving as a reputable agent for licensed and/or registered brokers in a multitude of states, including but not limited to Pennsylvania, New Hampshire, Illinois, Maryland, New York, New Jersey, Delaware, and the District of Columbia. Concurrently, Applicant is diligently pursuing additional licenses and registrations in Maine, Massachusetts, New Hampshire, Maryland, Illinois, Ohio, and Texas, showcasing our commitment to expanding our footprint responsibly.

Applicant is poised to introduce innovative energy brokerage services within the Commonwealth. We leverage a sophisticated online platform, www.joinarbor.com, which acts as a conduit for consumers to access and benefit from competitive energy supply plans. Applicant’s operation revolves around scrupulously monitoring supply rates, advocating for advantageous plans through strategic supplier relationships, and implementing auto-switching features designed to secure optimal savings for consumers. It is pivotal to note that Applicant operates as a facilitator, ensuring transactions between retail energy providers and clients are seamless, while not directly participating in the purchase, delivery, or invoicing of electricity.

The foundation of the Applicant is reinforced by Applicant’s leadership, each bringing a wealth of industry experience and knowledge. Applicant’s team members have had illustrious tenures at reputable organizations such as Inspire Energy Holdings LLC, licensed under Docket Nos. A-2013-2376082 and A-2021-3029546, and Amerex Brokers LLC, licensed under Docket Nos. A-2009-2113764 and A-2013-2365859 in Pennsylvania. These experiences contribute to a rich reservoir of industry insight and practical acumen.

Further extending Applicant’s reach and capabilities, Applicant’s parent company, Arbor, has developed and maintains a wide-ranging energy advisory platform available to consumers across all 50 states. This platform is a gateway to an array of energy products and services, including but not limited to competitive energy supply, rooftop solar solutions, weatherization, and various energy-saving initiatives. The synergy between Applicant and Arbor, coupled with the leadership of CEO Andrew Meyer and Head of Brokerage Jeff Mahoney, both seasoned professionals, ensures a holistic and proficient approach to energy brokerage.

Andrew Meyer, Applicant’s CEO, is actively involved in key operational aspects, ensuring that Applicant’s strategic objectives are met with diligence and integrity. On the other hand, Head of Brokerage, Jeff Mahoney, a certified Energy Management Professional with over 20 years of diverse experience in the energy industry, oversees all facets of Applicant’s operations, reinforcing Applicant’s commitment to delivering unparalleled services.

APPENDIX R
- J E F F M A H O N E Y -

Executive analytics leader in the fields of power generation and energy infrastructure

SUMMARY

- Over 15 years of leadership experience including 11 years of experience establishing, leading, and managing operational analytics programs and divisions with renowned Fortune 500 companies including KPMG and Accenture.
 - Launched and led over a dozen high-profile, analytics-driven strategy engagements with clients in the oil and gas, renewables, utility, power generation, retail, and public sector industries.
 - Twenty years of combined experience in the energy industry with an earlier career spanning highly technical operations roles with national energy companies and the U.S. Navy.
-

SKILLS

- | | |
|------------------------------------|--|
| • Policy and Procedure Development | • Performance Monitoring |
| • Organizational Structure | • Management Team Leadership |
| • Performance Metrics Analysis | • Change and Growth Management |
| • Executive Leadership | • Leadership and People Development |
| • Process Optimization | • Analytics Program Development and Management |
| • P&L Responsibility | • Energy Analytics and Real Time Data Management |
-

PROFESSIONAL EXPERIENCE

Gray Mechanical Contractors, Houston, TX • Vice President

04/2022 – 07/2023

Key member of an Executive Leadership Team, entrusted with overseeing all aspects of sales, administration, and execution for a prominent service organization. Adept at strategizing and implementing initiatives that drive operational excellence, foster revenue growth, and elevate customer satisfaction. Demonstrated expertise in leading cross-functional teams and optimizing processes to achieve business objectives and drive departmental income statement.

- Spearheaded and successfully implemented a comprehensive strategic, organizational, and operational restructuring initiative, transforming the organization's efficiency and effectiveness resulting in an over 75% reduction in warranty claims and a substantial increase in customer satisfaction levels.
- Streamlined workflows and eliminated redundancies, resulting in an overall cost reduction of 34%.
- Implemented new performance metrics and monitoring systems to track progress and measure the impact of the restructuring across the organization.
- Full \$10MM+ P&L responsibility

KPMG, Houston, TX • Director, Deal Advisory and Strategy Analytics

02/2019 – 01/2022

Recruited to build and lead KPMG's North American Energy Analytics group, in partnership with the Deal Advisory and Strategy practices, executive stakeholders, and external partner companies. Oversaw and assisted with due diligence and strategy engagements and provides analytics subject matter expertise to Fortune 100 clients in the upstream, midstream, downstream, mining, power generation, and utilities industries.

- Leading a team of up to 14 data scientists, engineers, and analysts through development of the division's critical operational policies spanning data governance, data management, domain knowledge, analytics services, and go-to-market strategy.
- Governing relationships with external contractors covering services including data lake development, data engineering as well as AWS, RedShift, and ServiceNow vendors.
- Presided over a \$1MM+ technology integration project for a midstream exploration and production company, involving the migration and integration of data from 5,000+ acquired well facilities, modernization of data governance, management, and reporting practices, and over 3,000 hours billed across internal data team and four external vendors.

- Headed a program with a large investor-owned utility involving the modeling of wildfire risk associated with thousands of miles of transmission lines and electrical substations in California; established rapport and solidified future projects with the utility, generating millions of dollars in revenue.
- Led a 5-person, \$575K project that aided a national retail fuel provider in identifying and capitalizing on variables that drive top-performing fuel stations in the northeastern US, further solidifying KPMG's position as an energy analytics leader.
- Employed Microsoft SQL Server, SQL, Python, R, Alteryx, Data Bricks, and Snowflake cloud computing platforms.

Amerex Energy Services, Sugar Land, TX • Director of Market Analytics

02/2017 – 02/2019

Led analytics services programs that supported electricity and natural gas procurement strategies for clients in the retail, financial services, education, as well as federal government agencies.

- Sourced electricity and natural gas load data from clients, energy providers, and municipal smart meters; managed datasets in relational databases using SQL Server, and employed Tableau/Qlik to build visual dashboards that facilitated strategic decision-making and contract optimization.
- Managed a \$325K modernization program for the Retail Operations Group involving internal accounting, sales, and engineering teams and the integration of seven legacy software tools into one consolidated system that enabled electronic contractual transactions, more accurate record-keeping, and faster identification and troubleshooting of discrepancies.
- Procured a substantial portion of the City of Houston's electricity needs from solar and wind sources through a combination of physical delivery through available infrastructure and renewable energy credits (REC).
- Spearheaded a renewable energy acquisition project that enabled Carnegie Mellon University to source all of its electricity needs from Radford Run Wind Farm in partnership with ENGIE.

Accenture, Houston, TX • Manager, Asset and Operations Service Group

02/2015 – 01/2017

Directed four high-profile remote operations, systems integration, data management, and visualization projects for Fortune 100 clients in the energy, utility, and technology industries that generated over \$50MM in revenue.

- Managed the optimization of a plant turnaround process for an oil and gas client, presided over the procurement and installation of remote sensing technology across the plant site, gathered logistics data, and recommended opportunities for improvement to client CEO that generated millions of dollars and hundreds of manhours in client savings.
- Facilitated a Fortune 100 technology client's migration from Waterfall to Agile project management methodology by building a Tableau-based dashboard for the executive leaders of their software engineering group that provided easy-to-understand insights into KPI improvements including time-savings, bug fixes, and post-project bugs.
- Managed a team of 14 data scientists through a \$20MM enterprise asset management (EAM) system for a utility client's nuclear operations that involved new integration development, data conversion from legacy systems, and data migration.

EARLY PROFESSIONAL CAREER

Pattern Energy, Houston, TX • Manager of Data Analysis

02/2012 – 02/2015

Pattern Energy, Houston, TX • Operations Control Center Operator

09/2011 – 02/2012

EDP Renewables, Houston, TX • Remote Operations Control Center Operator

03/2010 – 09/2011

Suez Energy, Houston, TX • Operations Technician

01/2009 – 09/2009

Constellation Energy, Houston, TX • Auxiliary Operator

02/2008 – 12/2008

U.S. Navy, Houston, TX • Nuclear Electronics Technician

05/2001 – 06/2007

EDUCATION

Masters of Business Administration • Colorado State University, Fort Collins, CO

Graduate Certificate in Business Intelligence • Colorado State University, Fort Collins, CO

Bachelors of Applied Science in Energy Management • Bismarck State College, Bismarck, ND



VIA ELECTRONIC FILING

November 15, 2023

RE: DR 3043382 – Application of Arbor Energy Brokerage Services LLC for an Electric Generation Supplier License in Pennsylvania Data Request

To whom it may concern:

I am in receipt of the Data Request that was filed on October 31, 2023. My response to each interrogatory is included below.

Q1. Reference Application, Section 1.a, Identity of Applicant – The Applicant stated that its web address is: www.joinarbor.com. This website appears to be a site for electricity shopping, and it lists various states along with license numbers at the very bottom for its web pages. Among this list is PA 4243413, which makes it appear that the company is already licensed and doing business in Pennsylvania. If the company is already doing business in Pennsylvania, Section 4.a of this Application needs to be resubmitted. If this is an affiliate of the company, then Sections 3.a and b need to be resubmitted. Alternatively, please provide an explanation.

A1. Arbor is currently a user of a third-party brokerage “platform”, NRG Kiosk d/b/a Power Kiosk (“NRG”). NRG has built an innovative brokerage “platform” that empowers its users (like Arbor) to increase access to the competitive energy markets, utilizing their software, supplier partnerships and integrations, and regulatory licenses, while ensuring compliance with strict internal policies and enforcement mechanisms. We are seeking our own license in order to work directly with energy suppliers. On the advice of regulatory counsel, and to be transparent about our current operating model, pending our own brokerage licenses, we included NRG’s license information on our website. Once we secure our own license in a given state, we will remove NRG’s license information and include our own.

Q2. Reference Application, Section 7.a, Financial Fitness – Applicant failed to provide sufficient documentation for proof of financial fitness. Please provide financial documents in the name of the applicant, such as bank account statements for a minimum of three months. If applicant is receiving funding from its parent organization, please provide a signed attestation that the parent organization will make funds available with amounts, terms and interest rates indicated.

A2. Applicant together with its parent company, Arbor Energy Holdings Inc. (“Arbor”), currently utilize unified financial accounts. Attached you will find bank (Bank of America), treasury (Merrill Lynch) account statements showing Arbor’s current cash reserves, and a signed attestation letter outlining Arbor’s commitment to the financial support of the Applicant. Arbor anticipates reaching profitability in 2024, once it has secured brokerage licenses and is therefore able to scale its operations. In addition, existing and other leading investors have

expressed significant interest in capitalizing Arbor to accelerate growth and product development.

Q3. Reference Application, Section 8.a, Appendix Q – Please provide copies of licenses in other jurisdictions.

A3. At the time of the application filing, Arbor Energy Brokerage Services LLC (“AEBS”) had filed for, but not yet obtained licenses in IL, MA, MD, ME, NH, and OH. As of the date of this response, AEBS has obtained licenses in OH and NH which are included in Appendix B of this response. AEBS’s parent company, Arbor Energy Holdings Inc (“AEH”) has obtained a license in Texas which is included in Appendix B of this response. All other licenses referenced in Appendix Q of the original application correspond with the partnership between Arbor and NRG Kiosk d/b/a Power Kiosk and are held by Power Kiosk.

Q4. Reference Application, Section 8.a, Appendix Q – Please define “team member”, if these are affiliated entities, please resubmit Section 3.a of the application.

A4. For the purposes of the initial filing, “team member” refers to the two employees of Arbor Energy Brokerage Services LLC, Andrew Meyer, CEO and Jeff Mahoney, Head of Brokerage.

If you have any additional questions, do not hesitate to contact me at (281) 783-9005 or via email at jeff@joinarbor.com.

I, Jeff Mahoney, 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).

Sincerely,



Jeff Mahoney
Head of Brokerage



ATTESTATION OF FINANCIAL SUPPORT

Date: November 14, 2023

As the Chief Executive Officer of Arbor Energy Holdings Inc. (“Arbor”), I hereby issue this attestation regarding the financial support Arbor is extending to its wholly owned subsidiary, Arbor Energy Brokerage Services LLC (“Applicant”).

Attestation of Financial Support:

As a wholly owned subsidiary of Arbor, Applicant will have access to Arbor funds to the extent required to operate consistent with the companies’ shared financial and operating plans. Arbor’s current financial position is detailed in the financial account statements submitted confidentially with Applicant’s application.

Terms of Access:

- 1. Shared Capitalization:** As a wholly owned subsidiary of Arbor, the Applicant has not and does not intend to seek capital from third-parties other than Arbor. Therefore, Arbor is committed to capitalizing Applicant to establish its initial operations.
- 2. As-Needed Cash Draw:** Arbor and Applicant have established a financial and operating plan under which Arbor shall make available to Applicant sufficient funds to operate as intended in the Pennsylvania market, under terms and conditions that are typical of a parent-subsiary relationship.
- 3. Repayment:** Through normal business operations, Applicant is anticipated to generate revenue, which shall be used to repay Arbor for such funds. Under this financial arrangement, both Applicant and Arbor anticipate generating gross margins to support their shared business success.

Signatories:

This document is executed by the undersigned as a true representation of the intent and legal commitment of Arbor and Applicant.

Sincerely,

A handwritten signature in black ink that reads "Andrew Meyer".

Andrew Meyer, CEO
Arbor Energy Holdings Inc.

A handwritten signature in black ink that reads "Jeff Mahoney".

Jeff Mahoney, Head of Brokerage
Arbor Energy Brokerage Services LLC

STATE OF NEW HAMPSHIRE

COMMISSIONER
Jared S. Chicoine

DEPUTY COMMISSIONER
Christopher J. Ellms, Jr.



DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-3670

FAX No. 271-1526

Website:
www.energy.nh.gov

October 3, 2023

Arbor Energy Brokerage Services, LLC
Andrew Meyer, CEO
2418 Spring Lane #5524
Austin, TX 78763

Re: **REG 2023-082** - Arbor Energy Brokerage Services, LLC (Arbor Energy)
Initial Registration as Provider of Electric Aggregation Service

Dear Mr. Meyer:

On September 27, 2023, Arbor Energy Brokerage Services, LLC submitted an application to the Department of Energy (Department) to register as a provider of electric aggregation service.

Review of the application determined it is complete and meets the requirements for approval under Puc 2003, Registration and Assessment Requirements, and Puc 2006.02, Information Required for Initial and Renewal Registration of Aggregators.

Under RSA 374-F:7, as amended effective July 1, 2021, the Department is now responsible for registration and regulation of electric aggregators and competitive electric power suppliers and for the adoption of related rules. The Department therefore is authorized to enforce the relevant provisions of the Puc 2000 rules, including those related to aggregator registration. *See* RSA 12-P:14.¹

Arbor Energy's application for registration is hereby approved, effective as of October 9, 2023, under Puc 2003.05(g)(1). The registration is for a term of two years and expires at the close of business on October 9, 2025. Pursuant to Puc 2003.06(a), you must submit your next renewal application at least 60 days prior to the expiration of the approved registration term, on or before August 10, 2025.

¹ On July 1, 2021, the Department came into existence and many functions previously performed by the Public Utilities Commission (PUC) were transferred to the Department. Under RSA 12-P:14, "[e]xisting rules, orders, and approvals of the [PUC] which are associated with any functions, powers, and duties, transferred to the [Department] pursuant to RSA 12-P:11 or any other statutory provision, shall continue in effect and be enforced by the commissioner of the [Department] until they expire or are repealed or amended in accordance with applicable law." *See* 2021 N.H. Laws Chapter 91 (House Bill 2-FN-A-Local).

Please be aware that registered providers of electric aggregation service are subject to specific requirements contained in N.H. Code Admin. Rules Puc 2000 – Competitive Electric Power Supplier and Aggregator Rules. These rules are available at:

<http://www.puc.nh.gov/Regulatory/Rules/PUC2000.pdf>.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jared S. Chicoine", with a long horizontal line extending to the right.

Jared S. Chicoine
Commissioner



**Public Utilities
Commission**

Jenifer French, Chair

Commissioners

Daniel R. Conway
Dennis P. Deters
Lawrence K. Friedeman
John D. Williams

Competitive Retail Electric Service Provider Certificate

Certified Entity:

Arbor Energy Brokerage Services LLC

2418 Spring Ln #5524

Austin, TX 78763

Certificate Number: **23-125153E**

Effective Date: October 09, 2023

Expiration Date: October 09, 2025

Issued Pursuant to Case Number(s):

23-0857-EL-AGG

The above referenced entity is hereby certified to provide competitive retail electric **Aggregator;Power Broker** services within the State of Ohio.

The certification of competitive retail electric service providers is governed by Chapters 4901:1-24 and 4901:1-21 of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code. This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

The certified entity is subject to all rules and regulations of the Public Utilities Commission of Ohio now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: **09 day of October, 2023.**



By Order of
The Public Utilities Commission of Ohio

Tanowa M. Troupe, Secretary
Michelle Green, Acting Secretary
Gail Young, Acting Secretary
Susan Patterson, Acting Secretary

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on
10/20/2023 1:50:43 PM**

in

Case No(s). 23-0857-EL-AGG

Summary: Certificate No. 23-125153E issued and electronically filed by Ms.
Melissa M. Scarberry on behalf of PUCO Staff.



Public Utility Commission of Texas

Broker Report

ARBOR ENERGY HOLDINGS INC BR230078

Type:	Corporation
Date Registered:	3/6/2023

DBA Names:

No DBA Records

Company Information

Customer Types:

Customer Details:

Contact Information

Company / Physical (Mailing Address)

ARBOR ENERGY HOLDINGS INC
2418 SPRING LN #5524
AUSTIN, TX 78763
Email: legal@joinarbor.com
Phone: 512-222-8192

Authorized Rep

ARBOR ENERGY HOLDINGS INC
ANDREW MEYER
CEO
2418 SPRING LN #5524
AUSTIN, TX 78763
Email: andrew@joinarbor.com
Phone: 512-222-8192

Contact (Complaint)

ARBOR ENERGY HOLDINGS INC
ANDREW MEYER
CEO
2418 SPRING LN #5524
AUSTIN, TX 78763
Email: andrew@joinarbor.com
Phone: 512-222-8192

Docket/Project/Control Numbers

49779-3151

Type: PROJECT
Open Date: 1/9/2023
Close Date: 3/6/2023
Filings: New
Note: INITIAL BROKER REGISTRATION APPLICATION

End Report

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Arbor Energy Brokerage Services LLC, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) electric broker / marketer 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:

Arbor Energy Brokerage Services LLC
2418 Spring Lane #5524
Austin, TX 78763
Web Address: www.joinarbor.com
Phone: (888) 836-3145

- 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 St.
Harrisburg, PA 17101

- 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 and future inquiries should be addressed.

NOTE: To ensure timely receipt of regulatory information, a contact employed directly by the Applicant, and not a consultant, is preferred.

Jeff Mahoney
Head of Brokerage
2418 Spring Lane #5524
Austin, TX 78763
Phone: (281) 783-9005
Email: regulatory@joinarbor.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.

Applicant is not using an attorney.

- 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.

Jeff Mahoney
Head of Brokerage
2418 Spring Lane #5524
Austin, TX 78763
Phone: (512) 222-8192
Fax: (512) 661-0400
Email: support@joinarbor.com

Andrew Meyer
Chief Executive Officer
2418 Spring Lane #5524
Austin, TX 78763
Phone: (512) 222-8192
Fax: (512) 661-0400
Email: support@joinarbor.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.

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):

- See Appendix N - Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- See Appendix O - Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation.
- Give name and address of officers.

Andrew Meyer
Chief Executive Officer
2418 Spring Lane #5524
Austin, TX 78763

Jeff Mahoney
Head of Brokerage
2418 Spring Lane #5524
Austin, TX 78763

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.

While the Applicant does not have any corporate affiliates other than its parent company Arbor Energy Holdings Inc. (collectively, "Arbor"), we acknowledge a contractual relationship with Power Kiosk LLC ("Power Kiosk"). Power Kiosk is a duly licensed electricity broker operating within the state [A-2018-3000981]. Arbor is a user of Power Kiosk's platform for certain business operations within Pennsylvania. This arrangement does not constitute a direct corporate affiliate relationship as per the typical legal definition, but out of an abundance of transparency, we wanted to recognize the relevance and importance of this relationship in our application and future operations within the state.

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 that have done business.

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)*:

- 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 is a wholly owned subsidiary of Arbor Energy Holdings Inc ("Arbor"). Arbor was founded in 2019 as a digital home energy advisor, with the purpose of lowering the cost of home energy for people and the planet. Arbor's innovative digital engagement platform helps consumers identify and adopt home energy products and services that save them money and reduce their environmental impact. To date, Arbor has helped consumers find more affordable and/or renewable energy supply options in deregulated markets by partnering with existing licensed electricity brokers such as Power Kiosk LLC. Having validated an ability to cost-effectively acquire customers, with industry-leading customer satisfaction, Applicant now seeks an electric broker license to unlock more value for end customers and supply partners.

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)
- Large Commercial Customers - (Over 25 kW)
- Industrial Customers
- Governmental Customers
- All of above
- Other (Describe):
- Residential and Small Commercial Customers in a Mixed Meter Capacity -

This customer class reflects situations in which a large commercial, industrial, and/or governmental customer account also contains features of residential and/or small commercial customers. In this instance, the residential and/or small commercial portion must be an incidental portion of the larger account. **This customer class alone does not allow marketing targeted directly to residential and/or small commercial customers.** Further information may be found in the Requirements Applicable to Mixed Meter Scenarios Secretarial Letter served March 25, 2011, at Docket No. M-2009-2082042.

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

Applicant proposes to actively market within the Commonwealth upon Commission approval of this application.

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 the applicant, nor any affiliate or predecessor, nor any 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. **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 has no actions of complaints to list.

- c. **SUMMARY:** Provide a statement as to the resolution or present status of any proceedings or actions listed above. Additionally, provide details of any actions the applicant has undertaken that will prevent the items listed above from occurring if licensed in Pennsylvania.

Not applicable.

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.

<p>Citizens' Electric Company: Citizens' Electric Company Attn: EGS Coordination 1775 Industrial Boulevard Lewisburg, PA 17837</p>	<p>Duquesne Light Company: Regulatory Affairs Duquesne Light Company 411 Seventh Street, MD 16-4 Pittsburgh, PA 15219</p>
<p>Met-Ed, Penelec, and Penn Power: Legal Department First Energy 2800 Pottsville Pike Reading PA, 19612</p>	<p>PECO: Manager Energy Acquisition PECO Energy Company 2301 Market Street Philadelphia, PA 19101-8699</p>
<p>Pike County Light & Power Company: Vice President – Energy Supply Corning Natural Gas Holding Corporation 330 West William Street Corning, NY 14830</p>	<p>PPL: Office of General Counsel Attn: Kimberly A. Klock PPL Two North Ninth Street (GENTW3) Allentown, PA 18101-1179</p>
<p>UGI: UGI Utilities, Inc. Attn: Rates Dept. – Choice Coordinator 1 UGI Drive Denver, PA 17517</p>	<p>Wellsboro Electric Company: Wellsboro Electric Company Attn: EGS Coordination 33 Austin Street P. O. Box 138 Wellsboro, PA 16901</p>
<p>West Penn Power: Legal Department West Penn Power d/b/a Allegheny Power 800 Cabin Hill Drive Greensburg, PA 15601-1689</p>	

7. FINANCIAL FITNESS

a. **FINANCIAL SECURITY:** 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 will not take title to electricity and will not pay electricity bills on behalf of its customers.

Original bond is being filed separately.

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, EGS suppliers should email pc-puc-tus-energy@pagov.onmicrosoft.com or call (717)783-5242 to determine the appropriate bonding amount based on a percentage of suppliers gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. Once the amount has been determined, suppliers 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 (preferred), 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 statements (3-12 recent consecutive months), tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

See Appendix P

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.

Applicant is operating as an electric broker / marketer only.

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

Applicant does not currently bill its retail energy customers for its services and will not be paid by or enter into supply contracts with its customers. The fees received by Applicant are paid directly by the EGS.

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.

Andrew Meyer
Chief Executive Officer
2418 Spring Lane #5524
Austin, TX 78763
Phone: (512) 222-8192
Fax: (512) 661-0400
Email: support@joinarbor.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. Submitting N/A on either the Sales Tax License Number or the Employer ID Number (items 7A and 7B) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Item 7A on the Tax Certification Statement is 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.

See Appendix Q

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 is devoted to maintaining transparency, fairness, and ethical integrity in all business operations, particularly in marketing. All marketing communications, whether disseminated via Applicant's website or advertisements on social media will be accurate, clear, and non-misleading, with all claims substantiated and relevant disclaimers prominently displayed. A stringent monitoring and oversight mechanism involving Officers and senior leadership is in place to regularly review marketing content and strategies, promptly address deviations, and implement corrective measures.

- 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.

Andrew Meyer, CEO

Jeff Mahoney, Head of Brokerage (See Appendix R for resume)

- 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.

All Applicants MUST include a Commission issued Docket Number in their publications. Docket Numbers are issued to new applicants when an application packet is submitted to the PUC's Secretary's Bureau. **Newspaper publications published without a Commission issued Docket No. will be rejected.** For more information, see 52 Pa. Code § 54.35.

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.

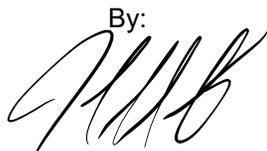
The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and **must be supplied to the Commission before the applicant is licensed.**

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News or Philadelphia Inquirer	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

(Newspaper Publication Templates are provided at Appendices K and L)

13. SIGNATURE

Applicant: Arbor Energy Brokerage Services LLC

By:

Jeff Mahoney

Title: Head of Brokerage

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: Arbor Energy Brokerage Services LLC

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

Applicant's Use

PUC Secretary's Bureau Use

Appendix A

APPLICATION AFFIDAVIT

State of TEXAS :

ss.

County of FORT BEND :

Jeff Mahoney, Affiant, being duly affirmed according to law, deposes and says that:

He is the Head of Brokerage of Arbor Energy Brokerage Services LLC;

That he is authorized to and does make this affidavit for said Applicant;

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

That the Applicant herein, Arbor Energy Brokerage Services 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, Arbor Energy Brokerage Services 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.

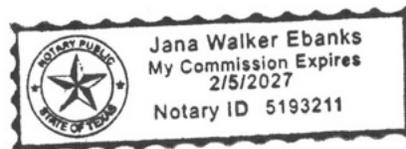
That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Handwritten Signature]
Signature of Affiant

Sworn and subscribed before me this 8th day of September, 2023

[Handwritten Signature]
Signature of official administering oath

My commission expires 2-5-27



Appendix B

OPERATIONS AFFIDAVIT

State of TEXAS :

: SS.

County of FORT BEND :

Jeff Mahoney, Affiant, being duly affirmed according to law, deposes and says that:

He is the Head of Brokerage of Arbor Energy Brokerage Services LLC;

That he is authorized to and does make this affidavit for said Applicant;

That Arbor Energy Brokerage Services 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 Arbor Energy Brokerage Services 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 Arbor Energy Brokerage Services 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.

That ArborEnergy Brokerage Services 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.



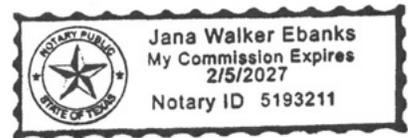
Signature of Affiant

Sworn and subscribed before me this 8th day of September, 20 23



Signature of official administering oath

My commission expires 2-5-27



Appendix C

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

Example CERTIFICATE OF SERVICE

On this the 28 day of September 2023, 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 or a USB flash drive, 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

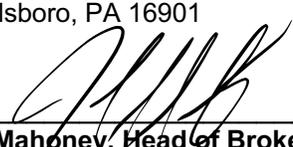
Office of General Counsel
Attn: Kimberly A. Klock
PPL
Two North Ninth Street (GENTW3)
Allentown, PA 18101-1179

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



Jeff Mahoney, Head of Brokerage

Appendix D

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

Electric Generation Supplier License Financial Instruments

Bonds or other financial instruments submitted in order to satisfy the licensing process must comply with the following:

The financial instrument, in the amount of \$250,000 for suppliers/aggregators or \$10,000 for brokers/marketers, should name the Pennsylvania Public Utility Commission as the obligee or beneficiary, and should contain the following unmodified language:

...“ in accordance with Section 2809(c)(1)(i) of the Public Utility Code, 66 Pa. C.S. 2809(c)(1)(i), to assure compliance with applicable provisions of the Public Utility Code, 66 Pa. C.S. 101, et seq. and the rules and regulation of the Pennsylvania Public Utility Commission by the Principal as a licensed electric generation supplier; to ensure the payment of Gross Receipts Tax as required by Section 2810 of the Public Utility Code, 66 Pa. C.S. 2810; to ensure the payment of annual fees as authorized by Act 155 of 2014; to adhere to the requirements of the Alternative Energy Portfolio Standards Act, 73 P.S. § 1648.1 et seq. and 52 Pa.Code 75.1 et seq.; and to ensure the supply of electricity at retail in accordance with contracts, agreements or arrangement. Payment of claims shall have the following priority: (I) The Commonwealth of Pennsylvania; (II) Electric Distribution Companies for the reimbursement of Gross Receipts Tax; and (III) Private Individuals. Proceeds of the bond may not be used to pay any penalties or fines levied against the Principal for violations of the law, or for the payment of any other tax obligations owed to the Commonwealth of Pennsylvania.”

The **ORIGINAL** financial instrument must be submitted, preferably by overnight delivery, to the Secretary of the Pennsylvania Public Utility Commission, 400 North Street, Keystone Building, Harrisburg, PA 17120. If the application is approved, the entry date of the Commission's Order will be the effective date of the license.

Applicants should CHOOSE ONE financial instrument template from Appendices E through H.



Pennsylvania Department of State
Bureau of Corporations and Charitable Organizations
PO Box 8722 | Harrisburg, PA 17105-8722
T: 717.787.1057
dos.pa.gov/BusinessCharities

September 6, 2023

Cogency Global Inc.
600 NORTH SECOND STREET
HARRISBURG, PA 17101

Entity Name: Arbor Energy Brokerage Services LLC
Entity File Date: September 6, 2023
Entity Number: 0013570673
Filing Type: Foreign Limited Liability Company

The Bureau of Corporations and Charitable Organizations is happy to send your filed document. The Bureau is here to serve you and we would like to thank you for doing business in Pennsylvania.

Thank you for registering with the Department of State to do business in Pennsylvania. Like many other businesses, you may have employees, sell taxable products, or provide a taxable service to consumers in Pennsylvania. Please visit www.pa100.state.pa.us to register for business taxes with the Department of Revenue and the Department of Labor and Industry. You may also visit www.Business.pa.gov to find resources for businesses through all stages of development.

Beginning in 2025, annual reports are required for all domestic filing entities, limited liability general partnerships and registered foreign associations. More information will be forthcoming from the Bureau. However, to ensure that you receive notice of how and when to make annual reports, keep all information on file with the Bureau up-to-date, particularly registered office address.

Delaware

The First State

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 FORMATION OF "ARBOR ENERGY BROKERAGE SERVICES LLC", FILED IN THIS OFFICE ON THE FIFTEENTH DAY OF AUGUST, A.D. 2023, AT 5:19 O`CLOCK P.M.



Jeffrey W. Bullock, Secretary of State

7624372 8100
SR# 20233257848

Authentication: 203971928
Date: 08-15-23

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

CERTIFICATE OF FORMATION

OF

ARBOR ENERGY BROKERAGE SERVICES LLC

(pursuant to the Delaware Limited Liability Company Act, 6 Del. C. § 18-101 *et seq.*)

1. The name of the limited liability company formed hereby is: Arbor Energy Brokerage Services LLC (the “**Company**”).

2. The address of the Company’s registered office in the State of Delaware is 850 New Burton Road, Suite 201, in the City of Dover, County of Kent 19904. The name of the registered agent at such address is Cogency Global Inc.

IN WITNESS WHEREOF, the undersigned authorized person has executed this Certificate of Formation this 15th day of August 2023.

/s/ Andrew Meyer

Andrew Meyer

Authorized Person

**PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

Pennsylvania Department of State
-FILED-
File #: 0013570673
Date Filed: 9/6/2023

Return document by mail to:

Name **PENNCORP SERVICEGROUP**

Address **COUNTER PICK UP**

penncorp@penncorp.net

City _____ State _____ Zip Code _____

Return document by email to: _____

Foreign Reg
DS
(re



412

88591-5887 09/06/2023 10:44 AM Received by Pennsylvania Department of State

Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.

Fee: \$250

I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):

- | | | |
|---|--|---|
| <input type="checkbox"/> Business Corporation | <input type="checkbox"/> Limited Partnership | <input type="checkbox"/> Business Trust |
| <input type="checkbox"/> Nonprofit Corporation | <input type="checkbox"/> Limited Liability (General) Partnership | <input type="checkbox"/> Professional Association |
| <input checked="" type="checkbox"/> Limited Liability Company | <input type="checkbox"/> Limited Liability Limited Partnership | |

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:

Arbor Energy Brokerage Services LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation is: Delaware

4. The street and mailing address of the association's principal office.

2418 Spring Lane #5524, Austin, Texas 78763

Number and street City State Zip

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association's jurisdiction of formation in that jurisdiction:

Number and street City State Zip

PA DEPT OF STATE

SEP 06 2023

88591-5888 09/06/2023 18:44 AM Received by Pennsylvania Department of State

DSCB:15-412 - 2

5. The (a) address of the association's proposed registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) OR (b) - not both.

(a) _____
 Number and street City OR State Zip County

(b) c/o: COGENCY GLOBAL INC. Dauphin
 Name of Commercial Registered Office Provider County

6. Check one of the following:

- The association may not have series.
- The association may have one or more series.

7. Effective date of registration of foreign association (check, and if appropriate complete, one of the following):

- The Foreign Registration Statement shall be effective upon filing in the Department of State.
- The Foreign Registration Statement shall be effective on: _____ at _____
 Date (MM/DD/YYYY) Hour (if any)

8. To be completed by Limited Liability Companies only. Check, and if appropriate complete, one of the following:

- The association is a limited liability company which is not organized to render any of the below professional service(s).
- The association is a restricted professional limited liability company organized to render one or more of the following professional service(s): (If this box is checked, one or more of the fields below must be checked.)

<input type="checkbox"/> Chiropractic	<input type="checkbox"/> Dentistry	<input type="checkbox"/> Law	<input type="checkbox"/> Medicine and surgery
<input type="checkbox"/> Optometry	<input type="checkbox"/> Osteopathic medicine and surgery	<input type="checkbox"/> Podiatric medicine	<input type="checkbox"/> Public accounting
<input type="checkbox"/> Psychology	<input type="checkbox"/> Veterinary medicine		

IN TESTIMONY WHEREOF, the undersigned association has caused this Foreign Registration Statement to be signed by a duly authorized representative thereof this _____ day of _____ August, 20 23.

Arbor Energy Brokerage Services LLC
 Name of Association

DocuSigned by:
Andrew Meyer
 DFAE0422D00D4EA

Andrew Meyer, Authorized Representative
 Title

APPENDIX Q TECHNICAL FITNESS

Applicant, although presently in the initial phases of acquiring licenses as an electricity broker, including a pending application with the Public Utilities Commission of Ohio, is a wholly owned subsidiary of Arbor Energy Holdings Inc (“Arbor”). This parent entity is a registered electric broker in Texas, holding Registration Number BR230078 since March 6, 2023, under Case No. 49779-3151. Arbor exemplifies versatility, serving as a reputable agent for licensed and/or registered brokers in a multitude of states, including but not limited to Pennsylvania, New Hampshire, Illinois, Maryland, New York, New Jersey, Delaware, and the District of Columbia. Concurrently, Applicant is diligently pursuing additional licenses and registrations in Maine, Massachusetts, New Hampshire, Maryland, Illinois, Ohio, and Texas, showcasing our commitment to expanding our footprint responsibly.

Applicant is poised to introduce innovative energy brokerage services within the Commonwealth. We leverage a sophisticated online platform, www.joinarbor.com, which acts as a conduit for consumers to access and benefit from competitive energy supply plans. Applicant’s operation revolves around scrupulously monitoring supply rates, advocating for advantageous plans through strategic supplier relationships, and implementing auto-switching features designed to secure optimal savings for consumers. It is pivotal to note that Applicant operates as a facilitator, ensuring transactions between retail energy providers and clients are seamless, while not directly participating in the purchase, delivery, or invoicing of electricity.

The foundation of the Applicant is reinforced by Applicant’s leadership, each bringing a wealth of industry experience and knowledge. Applicant’s team members have had illustrious tenures at reputable organizations such as Inspire Energy Holdings LLC, licensed under Docket Nos. A-2013-2376082 and A-2021-3029546, and Amerex Brokers LLC, licensed under Docket Nos. A-2009-2113764 and A-2013-2365859 in Pennsylvania. These experiences contribute to a rich reservoir of industry insight and practical acumen.

Further extending Applicant’s reach and capabilities, Applicant’s parent company, Arbor, has developed and maintains a wide-ranging energy advisory platform available to consumers across all 50 states. This platform is a gateway to an array of energy products and services, including but not limited to competitive energy supply, rooftop solar solutions, weatherization, and various energy-saving initiatives. The synergy between Applicant and Arbor, coupled with the leadership of CEO Andrew Meyer and Head of Brokerage Jeff Mahoney, both seasoned professionals, ensures a holistic and proficient approach to energy brokerage.

Andrew Meyer, Applicant’s CEO, is actively involved in key operational aspects, ensuring that Applicant’s strategic objectives are met with diligence and integrity. On the other hand, Head of Brokerage, Jeff Mahoney, a certified Energy Management Professional with over 20 years of diverse experience in the energy industry, oversees all facets of Applicant’s operations, reinforcing Applicant’s commitment to delivering unparalleled services.

APPENDIX R
- J E F F M A H O N E Y -

Executive analytics leader in the fields of power generation and energy infrastructure

SUMMARY

- Over 15 years of leadership experience including 11 years of experience establishing, leading, and managing operational analytics programs and divisions with renowned Fortune 500 companies including KPMG and Accenture.
 - Launched and led over a dozen high-profile, analytics-driven strategy engagements with clients in the oil and gas, renewables, utility, power generation, retail, and public sector industries.
 - Twenty years of combined experience in the energy industry with an earlier career spanning highly technical operations roles with national energy companies and the U.S. Navy.
-

SKILLS

- | | |
|------------------------------------|--|
| • Policy and Procedure Development | • Performance Monitoring |
| • Organizational Structure | • Management Team Leadership |
| • Performance Metrics Analysis | • Change and Growth Management |
| • Executive Leadership | • Leadership and People Development |
| • Process Optimization | • Analytics Program Development and Management |
| • P&L Responsibility | • Energy Analytics and Real Time Data Management |
-

PROFESSIONAL EXPERIENCE

Gray Mechanical Contractors, Houston, TX • Vice President

04/2022 – 07/2023

Key member of an Executive Leadership Team, entrusted with overseeing all aspects of sales, administration, and execution for a prominent service organization. Adept at strategizing and implementing initiatives that drive operational excellence, foster revenue growth, and elevate customer satisfaction. Demonstrated expertise in leading cross-functional teams and optimizing processes to achieve business objectives and drive departmental income statement.

- Spearheaded and successfully implemented a comprehensive strategic, organizational, and operational restructuring initiative, transforming the organization's efficiency and effectiveness resulting in an over 75% reduction in warranty claims and a substantial increase in customer satisfaction levels.
- Streamlined workflows and eliminated redundancies, resulting in an overall cost reduction of 34%.
- Implemented new performance metrics and monitoring systems to track progress and measure the impact of the restructuring across the organization.
- Full \$10MM+ P&L responsibility

KPMG, Houston, TX • Director, Deal Advisory and Strategy Analytics

02/2019 – 01/2022

Recruited to build and lead KPMG's North American Energy Analytics group, in partnership with the Deal Advisory and Strategy practices, executive stakeholders, and external partner companies. Oversaw and assisted with due diligence and strategy engagements and provides analytics subject matter expertise to Fortune 100 clients in the upstream, midstream, downstream, mining, power generation, and utilities industries.

- Leading a team of up to 14 data scientists, engineers, and analysts through development of the division's critical operational policies spanning data governance, data management, domain knowledge, analytics services, and go-to-market strategy.
- Governing relationships with external contractors covering services including data lake development, data engineering as well as AWS, RedShift, and ServiceNow vendors.
- Presided over a \$1MM+ technology integration project for a midstream exploration and production company, involving the migration and integration of data from 5,000+ acquired well facilities, modernization of data governance, management, and reporting practices, and over 3,000 hours billed across internal data team and four external vendors.

- Headed a program with a large investor-owned utility involving the modeling of wildfire risk associated with thousands of miles of transmission lines and electrical substations in California; established rapport and solidified future projects with the utility, generating millions of dollars in revenue.
- Led a 5-person, \$575K project that aided a national retail fuel provider in identifying and capitalizing on variables that drive top-performing fuel stations in the northeastern US, further solidifying KPMG's position as an energy analytics leader.
- Employed Microsoft SQL Server, SQL, Python, R, Alteryx, Data Bricks, and Snowflake cloud computing platforms.

Amerex Energy Services, Sugar Land, TX • Director of Market Analytics

02/2017 – 02/2019

Led analytics services programs that supported electricity and natural gas procurement strategies for clients in the retail, financial services, education, as well as federal government agencies.

- Sourced electricity and natural gas load data from clients, energy providers, and municipal smart meters; managed datasets in relational databases using SQL Server, and employed Tableau/Qlik to build visual dashboards that facilitated strategic decision-making and contract optimization.
- Managed a \$325K modernization program for the Retail Operations Group involving internal accounting, sales, and engineering teams and the integration of seven legacy software tools into one consolidated system that enabled electronic contractual transactions, more accurate record-keeping, and faster identification and troubleshooting of discrepancies.
- Procured a substantial portion of the City of Houston's electricity needs from solar and wind sources through a combination of physical delivery through available infrastructure and renewable energy credits (REC).
- Spearheaded a renewable energy acquisition project that enabled Carnegie Mellon University to source all of its electricity needs from Radford Run Wind Farm in partnership with ENGIE.

Accenture, Houston, TX • Manager, Asset and Operations Service Group

02/2015 – 01/2017

Directed four high-profile remote operations, systems integration, data management, and visualization projects for Fortune 100 clients in the energy, utility, and technology industries that generated over \$50MM in revenue.

- Managed the optimization of a plant turnaround process for an oil and gas client, presided over the procurement and installation of remote sensing technology across the plant site, gathered logistics data, and recommended opportunities for improvement to client CEO that generated millions of dollars and hundreds of manhours in client savings.
- Facilitated a Fortune 100 technology client's migration from Waterfall to Agile project management methodology by building a Tableau-based dashboard for the executive leaders of their software engineering group that provided easy-to-understand insights into KPI improvements including time-savings, bug fixes, and post-project bugs.
- Managed a team of 14 data scientists through a \$20MM enterprise asset management (EAM) system for a utility client's nuclear operations that involved new integration development, data conversion from legacy systems, and data migration.

EARLY PROFESSIONAL CAREER

Pattern Energy, Houston, TX • Manager of Data Analysis

02/2012 – 02/2015

Pattern Energy, Houston, TX • Operations Control Center Operator

09/2011 – 02/2012

EDP Renewables, Houston, TX • Remote Operations Control Center Operator

03/2010 – 09/2011

Suez Energy, Houston, TX • Operations Technician

01/2009 – 09/2009

Constellation Energy, Houston, TX • Auxiliary Operator

02/2008 – 12/2008

U.S. Navy, Houston, TX • Nuclear Electronics Technician

05/2001 – 06/2007

EDUCATION

Masters of Business Administration • Colorado State University, Fort Collins, CO

Graduate Certificate in Business Intelligence • Colorado State University, Fort Collins, CO

Bachelors of Applied Science in Energy Management • Bismarck State College, Bismarck, ND