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**VIA ELECTRONIC FILING**

February 24, 2025

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

**Re: PUC Docket No. A-2025-3052900 – Electric Application of Orzel Energy Solutions LLC  
("Orzel Energy")**

Dear Secretary Chiavetta:

In response to the letter with Staff data requests sent on January 29, 2025, to Orzel Energy Solutions LLC, related to its application for an Electric Supplier License (Broker), please find enclosed the requested information for Data Requests #1, #2, and #3.

Thank you, and please direct any questions or concerns about the information enclosed to the undersigned.

Respectfully,

*/s/ Michelle Mann*

Michelle Mann

Director of Government Affairs and  
Regulatory Paralegal

Feller Law Group, PLLC

Phone: (718) 690-3480

Email: [michellemann@feller.law](mailto:michellemann@feller.law)

*On behalf of Orzel Energy Solutions LLC*



**VERIFICATION**

I, Chaim Orzel, 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).

Signature

Title: President

Date: 2/17/2025

**Docket No. A-2025-3052900**  
**Orzel Energy Solutions LLC**  
**Data Request #1**

Reference Application, Section 2.b, PA Registration – Applicant provided an amendment document from the PA Department of State. Please provide a document from the PA Department of State which shows the applicant's *initial filing date*.

**Response:**

Please refer to Exhibit 1.

**Exhibit 1**  
**PA Registration**

**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](http://dos.pa.gov/BusinessCharities)

<b>Entity Name:</b>	Orzel Energy Solutions LLC		
<b>Jurisdiction:</b>	NEW YORK	<b>Issuance Date:</b>	05/03/2024
<b>Entity No.:</b>	0013678748	<b>Receipt No.:</b>	001033758
<b>Entity Type:</b>	Foreign Limited Liability Company	<b>Certificate No.:</b>	035281227

**Document Listing**

Image No.	Date Filed	Effective Date	Filing Description	No. of Pages
B0635-2141	12/06/2023	12/06/2023	Initial Filing	2

\*\* \*\*\*\* \*\*\*\*\* \*\*\*\*\* End of list \*\*\*\*\* \*\*\*\*\* \*\*\*\* \*\*

I, Albert Schmidt, Secretary of the Commonwealth of Pennsylvania, do hereby certify that the attached document(s) referenced above are true and correct copies and were filed in this office on the date(s) indicated above.



IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the seal of my office to be affixed, the day and year above written

**ALBERT SCHMIDT**  
Secretary of the Commonwealth

Verify this certificate online at [www.file.dos.pa.gov](http://www.file.dos.pa.gov)

88627-1627 12/06/2023 10:45 AM Received by Pennsylvania Department of State  
88627-1627 12/15 PM Received by Pennsylvania Department of State

Pennsylvania Department of State  
**-FILED-**  
File #: 0013678748  
Date Filed: 12/6/2023

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

Return document by mail to: <u>15244071 SD 19</u>		Foreign Registration Statement DSCB:15-412 (rev. 2/2017)  412	
Name <u>CT - COUNTER</u>			
Address <u>mia.barowski@wotherskuwer.com</u>			
City	State		Zip Code
<input checked="" type="checkbox"/> Return document by email to: _____			

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):

- Business Corporation
- Nonprofit Corporation
- Limited Liability Company
- Limited Partnership
- Limited Liability (General) Partnership
- Limited Liability Limited Partnership
- Business Trust
- Professional Association

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

Orzel Energy Solutions 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: New York

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

<u>1025 E 14th St Apt C2,</u>	<u>Brooklyn,</u>	<u>NY</u>	<u>11230</u>
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:

<u>1025 E 14th St Apt C2,</u>	<u>Brooklyn,</u>	<u>NY</u>	<u>11230</u>
Number and street	City	State	Zip

PA DEPT OF STATE

DEC 06 2023

PA DEPT OF STATE

DEC 18 2023

Certificate Verification No.: 035281227 Date: 05/03/2024

88635-2142 12/06/2023 18:45 AM Received by Pennsylvania Department of State  
88627-1528 12/06/2023 12:15 PM 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: C T Corporation System \_\_\_\_\_  
Name of Commercial Registered Office Provider Dauphin 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)

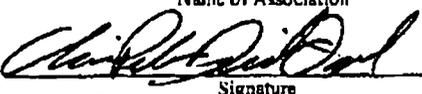
8. To be completed by Limited Liability Companies only. Check, and if appropriate complete, one of the following:

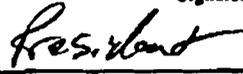
- The association is a limited liability company which is not organized to render any of the below professional service(s).
- The association is a restricted professional limited liability company organized to render one or more of the following professional service(s): (If this box is checked, one or 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 \_\_\_\_\_, 20\_\_\_\_\_.

Orzel Energy Solutions LLC  
Name of Association

  
Signature

  
Title

Certificate Verification No.: 035281227 Date: 05/03/2024

**Docket No. A-2025-3052900**  
**Orzel Energy Solutions LLC**  
**Data Request #2**

Reference Application, Section 7.f, Taxation – Applicant failed to provide responses to questions #8 and #9 on the Tax Certification Statement. Please resubmit a complete Tax Certification Statement.

**Response:**

Please refer to Exhibit 2.

With regards to Section 7a - Sales Tax License, please be advised that broker services are not subject to sales tax.

**Exhibit 2**  
**Tax Certification Statement**  
**Public Version**



**Docket No. A-2025-3052900**  
**Orzel Energy Solutions LLC**  
**Data Request #3**

Reference Application, Section 8.a, Technical Fitness – Please provide copies of licenses for CT, IL, MD, NJ, OH, and TX.

**Response:**

Please refer to Exhibit 3.

For Texas, brokers are not licensed. Instead, they must register with the Public Utility Commission of Texas (PUCT). Upon acceptance of the registration application, the PUCT sends an email confirmation to the broker. The registration approval email for Orzel Energy has been provided for this request.

**Exhibit 3**  
**CT License**



# STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY  
TEN FRANKLIN SQUARE  
NEW BRITAIN, CT 06051

- DOCKET NO. 23-10-15 APPLICATION OF POWER KIOSK LLC FOR A CONNECTICUT ELECTRIC AGGREGATOR CERTIFICATE OF REGISTRATION
- DOCKET NO. 23-11-21 APPLICATION OF BRADLEY R. LEWIS FOR A CONNECTICUT ELECTRIC AGGREGATOR CERTIFICATE OF REGISTRATION
- DOCKET NO. 23-11-23 APPLICATION OF ORZEL ENERGY SOLUTIONS LLC FOR A CONNECTICUT ELECTRIC AGGREGATOR CERTIFICATE OF REGISTRATION
- DOCKET NO. 23-12-01 APPLICATION OF GREENCROWN ENERGY, LLC FOR A CONNECTICUT ELECTRIC AGGREGATOR CERTIFICATE OF REGISTRATION
- DOCKET NO. 23-12-04 APPLICATION OF AVIDXCHANGE, INC. FOR A CONNECTICUT ELECTRIC AGGREGATOR CERTIFICATE OF REGISTRATION
- DOCKET NO. 23-12-05 APPLICATION OF COBRA ENERGY LLC FOR A CONNECTICUT ELECTRIC AGGREGATOR CERTIFICATE OF REGISTRATION

February 14, 2024

By the following Commissioners:

Marissa P. Gillett  
John W. Betkoski, III  
Michael A. Caron

**DECISION**

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## DECISION

### I. INTRODUCTION

In October through December 2023, the following companies each applied to the Public Utilities Regulatory Authority (Authority) for a Connecticut Electric Aggregator Certificate of Registration: Power Kiosk LLC; Bradley R Lewis; Orzel Energy Solutions LLC; Greencrown Energy, LLC; AvidXchange, Inc.; and Cobra Energy LLC (Applicants). The Authority, including its Office of Education, Outreach, and Enforcement (EOE), reviewed all of the information in the record of the above-referenced dockets. The Authority finds that the Applicants satisfied all of the application requirements and grants each of the Applicants an Electric Aggregator Certificate of Registration to serve the non-residential markets requested by each Applicant, subject to the conditions described herein. See Conn. Gen. Stat. § 16-245.

### II. AUTHORITY ANALYSIS

#### A. LEGAL STANDARD

An “electric aggregator” is defined to include “a person . . . that gathers together electric customers for the purpose of negotiating the purchase of electric generation services from an electric supplier . . . provided such person . . . is not engaged in the purchase or resale of electric generation services, and provided further such customers contract for electric generation services directly with an electric supplier . . .” Conn. Gen. Stat. § 16-1(a)(25). Any “third-party who contracts with or is otherwise compensated by an electric supplier to sell electric generation services, or contracts with or is compensated by a third-party marketer of the electric supplier to sell electric generation services for the electric supplier, shall be a legal agent of the electric supplier.” Conn. Gen. Stat. § 16-245o(h)(1). As such, an electric aggregator must act on behalf of the electric customer, and an electric aggregator may not be a supplier or an agent of a supplier.

Electric aggregators are required to apply for and obtain an Electric Aggregator Certificate of Registration from the Authority prior to engaging in the electric aggregation business in Connecticut. Conn. Gen. Stat. § 16-245(l)(2). The application must contain information the Authority deems relevant, including general corporate information, contact information, financial statements, and disclosures related to consumer protection violations. See Conn. Gen. Stat. § 16-245(l)(3). Electric aggregators must also comply with certain requirements related to marketing, see Conn. Gen. Stat. § 16-245o; therefore, applicants must demonstrate a willingness and ability to comply with such requirements. **Registered electric aggregators that fail to comply with any registration condition or violate any provision of General Statutes § 16-245(l) or General Statutes § 16-245o may be subject to civil penalties and the suspension or revocation of such registration.** See Conn. Gen. Stat. §§ 16-245(l)(6) and 16-245o(k).

Consequently, upon receipt of an application, the Authority determines whether (1) the required information was submitted, (2) the applicant qualifies as an electric

aggregator, (3) the applicant has demonstrated a willingness and ability to comply with General Statutes § 16-245o, and (4) any registration conditions are appropriate.

#### **B. COMPENSATION BY CUSTOMERS, NOT SUPPLIERS**

A review of the contracts between the Applicants and suppliers reveals that many of the contracts do not clearly describe the Applicant as being compensated by the customer. With respect to aggregator compensation, there may be instances in which non-residential customers wish to receive one bill for all of their energy supply services. In those instances, it benefits the non-residential customer for the supplier to include the aggregator's compensation in that bill and pass that compensation through to the aggregator. Any pass-through agreement that is not a straight pass-through is not permitted in contracts between electric aggregators and suppliers. A straight pass-through is a simple concept, explained by EOE in Motion No. 16 in Docket No. 14-07-20RE01, PURA Development and Implementation of Marketing Standards and Sales Practices by Electric Suppliers - Revised Standards. If the supplier's rate is 10 cents/kilowatt-hour (kWh), and the aggregator adds 1 cent as commission, the supplier charges the customer 11 cents/kWh and passes through the extra 1 cent/kWh to the aggregator. Any other form of compensation passed from a supplier to an aggregator is impermissible.

Not all supplier contracts provided by the Applicants contained straight pass-through provisions. Many contain provisions in which a portion of the aggregator's mark-up goes to the supplier. Others contain provisions in which the supplier pays the aggregator a flat fee for each customer procured, in the same way a supplier would pay an agent. Some contracts contain provisions in which the supplier (1) pays the aggregator an amount up front, (2) includes the aggregator's mark-up in the customer's rate, and (3) retains any excess. Still others do not remove the mark-up if the customer ceases doing business with the aggregator. Any compensation structure in which the supplier is retaining a portion of the aggregator's compensation or paying the aggregator a fee unrelated to the customer's usage calls into question the relationship between the supplier and the aggregator and the relationship between the aggregator and the customer. As a result, the Authority directs all Applicants to revise all contracts with suppliers that currently do not contain straight pass-through compensation as described and to submit such revised contracts to the Authority.

#### **C. REPRESENTATION OF CUSTOMERS, NOT SUPPLIERS**

A review of the contracts between the Applicants and suppliers reveals that many of the contracts do not clearly describe the Applicant as representing the customer. Applicants' contracts with suppliers may not contain provisions in which the Applicant is treated as a supplier's agent. Suppliers and the Applicants must decide whether the Applicants are suppliers' agents or the Applicants represent customers as electric aggregators. To the extent they determine the latter, their contracts must reflect that relationship. In addition, Applicants must ensure that their customers understand the Applicants' role and the costs for the service they provide. Many Applicants indicated that they do not divulge their commission to their customers. The regulatory imperative in Connecticut supports the principle of transparency, such that customers are entitled to

information adequately informing them that they are paying the Applicant for a service and that such payment is included in their supplier's rate. Many Applicants also indicate that they do not divulge to customers the number of suppliers with which they do business. To make an informed decision, customers need to understand, for example, whether an Applicant is evaluating bids from five suppliers or two. Customers further need to understand how the Applicant selects the bids to show to the customer (presuming it does not show the customer all bids).

With respect to the Applicant's role as a representative of the customer, and not an agent of the supplier, many of the contracts between suppliers and the Applicants contain additional provisions that call into question the Applicant's role. For example, there are contractual provisions specifically stating that the supplier appoints the Applicant as a "sales representative . . . to promote, market, and sell" the supplier's product. Electric aggregators may not promote, market, or sell for suppliers. Some contracts say that the Applicants agree to "solicit potential customers." Again, electric aggregators represent customers and are not permitted to solicit on behalf of a supplier. Some contracts say that Applicants will use the supplier's marketing material; however, the Applicants should not be marketing for the suppliers at all.

Any contract with provisions which conflict with, directly or implicitly, the Applicant's role and function as the customer's agent must be revised to remove such provisions, as a condition of receipt of an Electric Aggregator Certificate of Registration.

Some Applicants indicated outside entities provide services to customers on their behalf. Anyone making sales on behalf of the Applicant, facilitating customers contracting with a supplier on behalf of the Applicant, receiving compensation or a commission from the Applicant for facilitating customers contracting with a supplier, or facilitating customers contracting with a supplier pursuant to an agreement with the Applicant (whether labeled as an Independent Contractor, broker, channel partner, or any other title) is an agent of the Applicant for whom the Applicant is responsible. The above list is not comprehensive, and all Applicants shall read it with the understanding that there are only three legal entities permitted to operate in the electric supplier market in Connecticut (i.e., suppliers, aggregators, and their agents), as noted in the Authority's Motion No. 16 Ruling in Docket No. 14-07-20RE01. If Applicants have agreements with any entities, such as those listed above, in which the agreement indicates that the entity is not the Applicant's agent, the Applicant must revise or amend such agreements to reflect an agency relationship. Further, Applicants must understand their legal responsibilities for anyone acting as their agent and interacting with customers, and Applicants must train and monitor all agents to ensure compliance with General Statutes § 16-245o and other applicable law, regulations, Authority decisions, orders, and rulings. All Applicants shall annually file in their licensing docket a list of all agents working on their behalf (Third Party Agent Form).<sup>1</sup>

Applicants must recognize that, in being granted an Electric Aggregator Certificate of Registration, they are entering a highly regulated and transparent market in which they

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<sup>1</sup> The Third-Party Agent Form is available on the Authority's website, at [Information for Electric Suppliers](#), by using the "Aggregator Agent Form" link.

represent customers. As such, they must ensure that their business complies with all applicable laws, including statutes, regulations, and Authority decisions, orders, and rulings. Applicants must accept the responsibility of ensuring they maintain knowledge of the legal framework under which they function in Connecticut. Equally as important, Applicants must recognize that they solely represent customers in this process and have the responsibility of acting as the customer's agent and working in the customer's best interest. General Statutes § 16-245o places many obligations and restrictions on aggregators' engagement with customers, and additionally prohibits deceptive marketing and makes any violation thereof a violation of the Connecticut Unfair Trade Practices Act. See Conn. Gen. Stat. § 42a-110a et seq. Applicants must familiarize themselves with the Authority's application of General Statutes § 16-245o to aggregators and suppliers. Any Applicant found deviating from its legal responsibilities and obligations may be subject to prosecution and the imposition of civil penalties. See Conn. Gen. Stat. § 16-41.

All requests to represent customers in residential markets are denied. No Applicant provided information sufficient to assure the Authority that residential customers would be properly served. As a result, the Authority determines that no Applicant has met the burden of demonstrating it is capable of serving as an aggregator in the residential market and/or working with residential customers.<sup>2</sup>

#### **D. THREE CUSTOMER COMMUNICATIONS**

To facilitate the requisite transparency with customers, every Applicant must provide each customer with three documents (Three Customer Communications).<sup>3</sup>

##### **1. First Customer Communication Document**

The Applicant must provide the first document at the outset of the relationship between the Applicant and the customer, and the document must:

1. Describe in detail how the Applicant will be compensated;
2. Explain the process that the Applicant uses to find prospective rates for the customer;
3. Explain to the customer the number of suppliers (or approximate number) from which the Applicant will solicit rates and the current suppliers from whom it solicits;<sup>4</sup> and
4. Require the customer's signature to permit the Applicant to obtain pricing for the customer.

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<sup>2</sup> To the extent the Applicant checked the box in Section B-2 for "Other" but did not indicate what it requested for "Other," the Authority denies that request and limits service to the boxes checked that contained known customer types.

<sup>3</sup> The documents referred to in this section may be provided as electronic documents.

<sup>4</sup> A few Applicants submitted contracts with customers that provided much, if not all, of this information. If any Applicant believes its current customer contract complies with the requirements herein, it may continue to use its contract following the compliance filings addressed in Order No. 6 of this Decision.

## 2. Second Customer Communication Document

The Applicant must provide the second document to the customer once the Applicant has obtained prospective rates, and the document must:

1. List each supplier from which the Applicant solicited prospective rates;
2. State the rates offered by each supplier;
3. Describe the Applicant's commission included in each rate,<sup>5</sup> and
4. Require the customer's signature acknowledging receipt of said information.<sup>6</sup>

## 3. Third Customer Communication Document

The third document is the notice required by Conn. Agencies Regs. § 16-245-3(d),<sup>7</sup> and the Applicant would provide this notice to the customer after the customer contracted with a supplier.

Each Applicant shall retain copies of the Three Customer Communications for three years from the date on which they are signed by the customer, as applicable.

## E. SOLICITATION REQUIREMENTS

All Applicants must solicit prospective rates for each customer from more than one supplier, except in the following two limited circumstances:

1. When an existing customer explicitly requests that an Applicant only provide pricing from a single supplier, or
2. When the pricing being sought is to amend and/or extend an existing agreement between the customer and a particular supplier.

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<sup>5</sup> For example, if the aggregator provides rates from Supplier A and Supplier B, and the aggregator's commission with Supplier A is one cent and with Supplier B is two cents, this must be explained to the customer. This information may be included as part of the bid package given to the customer and may include the Applicant's recommendation. If the Applicant directly charges the customer a flat fee (i.e., does not collect a fee through the supplier) and does not include a commission and/or mark-up to the suppliers' rates, it may include only the supplier's rates, but the Applicant would have been required to disclose the flat fee in the first document. To address changes in the market, an Applicant may seek to adjust their fee after the second of the Three Customer Communications has been supplied to the customer. An Applicant may reduce their fee to address market conditions without additional notification to the customer. If an Applicant seeks to increase their fees to address market conditions, the increased fee must be disclosed in an updated/new offer to the customer.

<sup>6</sup> Power Kiosk LLC requested an exemption from this provision. Power Kiosk LLC Comments, p. 1. The Authority reviewed Power Kiosk LLC's request and denies the request. This requirement is applicable to all those seeking an Electric Aggregator Certificate of Registration in Connecticut.

<sup>7</sup> Conn. Agencies Reg. § 16-245-3(d) provides in relevant part that "[n]ot more than sixty days (60) after an aggregated customer contracts with an electric supplier, and not more than sixty days after any renewal, extension or modification of such contract, the electric aggregator shall issue to the aggregated customer a notice containing the following information: (1) The name, address and toll-free customer service telephone number of the electric supplier that provides electric generation services under its aggregation offer; and (2) The rate for electric generation services stated in its aggregation offer, or a description of how electric generation services are charged to customers under its aggregation offer."

Apart from these two exceptions, an entity that fails to solicit rate offers from more than one supplier and enrolls customers with that supplier will be deemed an agent of that supplier and subject to all applicable requirements for supplier agents.

### **III. CONCLUSION AND ORDERS**

#### **A. CONCLUSION**

In the above-referenced dockets, the Authority finds that the required information was submitted, the Applicants qualify as electric aggregators, the Applicants have demonstrated a willingness and ability to comply with General Statutes § 16-245o, and the registration conditions set forth herein are appropriate. Applicants named herein are each granted an Electric Aggregator Certificate of Registration to serve all customer classes requested other than residential customers; however, Applicants shall follow all orders contained herein before they are allowed to conduct business as an electric aggregator in Connecticut.

#### **B. ORDERS**

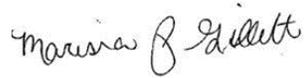
For Orders requiring a filing, each Applicant shall file an electronic version through the Authority's website at [www.ct.gov/pura](http://www.ct.gov/pura). Submissions filed in compliance with the Authority's Orders must be identified by: Docket Number, Title, and Order Number. Compliance with orders shall commence and continue as indicated in each specific order or until an Applicant requests and the Authority approves that an Applicant's compliance is no longer required after a certain date. Unless otherwise provided or determined by the Authority, filings submitted in compliance with an order shall constitute satisfaction of the order. Filings requiring Authority approval must be filed as a motion.

1. Applicants shall serve only commercial, industrial, municipal, or government customers, as such categories were requested in each Applicant's respective application. Applicants shall not serve residential customers.
2. Prior to serving any customer in Connecticut, each Applicant shall revise and/or amend all existing contracts with suppliers to eliminate any form of pass-through compensation other than the straight pass-through compensation discussed herein.
3. Prior to serving any customer in Connecticut, each Applicant shall revise and/or amend all existing contracts with suppliers to remove any provision conflicting with the aggregator's function solely as the agent of the customer.
4. Applicants shall not enter into future contracts with suppliers that do not conform to Order Nos. 2 and 3 above.
5. Prior to serving any customer in Connecticut, each Applicant shall revise and/or amend all existing contracts with any entity engaging with customers on the Applicant's behalf and/or being compensated by the Applicant for engaging with

customers to ensure such contracts reflect an agency relationship between the Applicant and that entity.

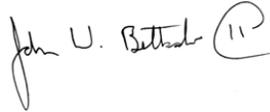
6. **No later than March 28, 2024**, each Applicant shall file copies of contracts revised and/or amended pursuant to Order Nos. 2, 3, and/or 5 as a compliance filing in its respective licensing docket.
7. Applicants shall immediately incorporate the use of the Three Customer Communications for all future procurements of Connecticut customers and shall retain the documentation for three years from the date on which the respective document was executed by the customer.
8. Prior to serving any customer in Connecticut, each Applicant shall submit a complete Third-Party Agent form in its licensing docket and shall submit such form on or before **October 15th, annually**, thereafter in its respective licensing docket. If any Applicant does not contract with third-party agents, it must make an annual filing indicating so.
9. Each Applicant shall notify the Authority within 10 days if there are any changes to any material filed in its respective application.
10. Each Applicant shall provide the Authority with notice of any changes to its customer service practices, procedures, or policies, in writing, at least 10 days prior to the effective date of such changes.
11. Each Applicant shall maintain customer complaint records to indicate:
  - a. Date of the complaint;
  - b. Name and address of the complainant;
  - c. Address or location cited in the complaint;
  - d. Description of the complaint; and
  - e. Description of the resolution of the complaint.
12. Each Applicant shall maintain a toll-free phone number for customers. See Conn. Gen. Stat. § 16-245(l)(3)(C).
13. The Company shall comply with the sales, solicitation, and marketing provisions of General Statutes § 16-245o, including, without limitation, subsections (h) and (i).

This Decision is adopted by the following Commissioners:



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Marissa P. Gillett



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John W. Betkoski, III



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Michael A. Caron

CERTIFICATE OF SERVICE

The foregoing is a true and correct copy of the Decision issued by the Public Utilities Regulatory Authority, State of Connecticut, and was forwarded by Certified Mail to all parties of record in this proceeding on the date indicated.



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Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
Public Utilities Regulatory Authority

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February 14, 2024

Date

## **Exhibit 3**

### **IL License**

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

**Orzel Energy Solutions LLC** :  
 :  
**Application for Licensure of** : **23-0485**  
**Agents, Brokers, and Consultants** :  
**under Section 16-115C of the** :  
**Public Utilities Act.** :

**ORDER**

By the Commission:

**I. INTRODUCTION**

On June 26, 2023, Orzel Energy Solutions LLC (“Applicant”) filed a verified Application with the Illinois Commerce Commission (“Commission”) requesting a certificate of service authority to operate as an agent, broker, or consultant (“ABC”) in Illinois pursuant to Section 16-115C of the Public Utilities Act (“Act”), 220 ILCS 5/1-101 et seq., and 83 Ill. Adm. Code 454, "Licensure of Retail Electric Agents, Brokers and Consultants" (“Part 454”). Applicant requests authority to offer services as an ABC for the procurement or sale of retail electricity supply for third parties in the State of Illinois. Upon review of the Application, Staff of the Commission (“Staff”) requested additional information and clarification of certain matters. On July 5, 2023, Staff filed Correspondence. On July 5, 2023, Administrative Law Judge (“ALJ”) issued a ruling directing Applicant to file a verified Amended Application to address the deficiencies on or before July 20, 2023. On July 17, 2023, Applicant filed an Amended Application. On July 20, 2023, Staff of the Commission (“Staff”) filed a Verified Statement recommending that the Commission grant the requested certificate of service authority. The ALJ waived the hearing in this matter, entered the Amended Application and Staff’s Verified Statement into the record and marked the record “Heard and Taken.”

**II. REQUIREMENTS FOR ALL APPLICANTS UNDER SECTION 16-115C OF THE ACT**

Applicant is a business organized under the laws of New York and authorized to transact business in Illinois. Applicant has certified that it will comply with all applicable regulations; that it will comply with informational and reporting requirements established by Commission rule; that it will comply with informational and reporting requirements pursuant to Section 16-115C of the Act; and that it will comply with all other applicable laws, regulations, terms, and conditions required to the extent they have application to the services being offered by an ABC. Applicant has agreed to ensure that any person who acts on its behalf will comply with all applicable sections of Part 454. Applicant agrees that it will remain in compliance with the provisions of the Act and Part 454, and will ensure that authorizations received from customers, and all other applicable records

are retained for a period of not less than three calendar years after the calendar year in which they were created. Applicant has agreed to adopt and follow rules and procedures to preserve the confidentiality of its customers' data. The Applicant has also attested that no complaints have been filed against it for its provision of services in the electric or gas industry in the jurisdictions where it provides or is seeking to provide services.

### **III. FINANCIAL, TECHNICAL, AND MANAGERIAL REQUIREMENTS OF SECTION 16-115C**

Applicant is required by Section 454.60 to demonstrate that it meets the managerial qualifications necessary to provide services as an ABC. Applicant must further provide an organizational chart that indicates the position of persons which satisfy the managerial qualification. Applicant has demonstrated that it meets the managerial qualifications set forth in Section 454.60 through Attachment 2 to the Application. Attachment 3 to the Application contains a corporate organizational chart and identifies the occupational background information of the persons being used to meet the requirements of Section 454.60(a). Attachment 2 contains occupational background information on the person or persons being used to meet the requirements of Section 454.60(a).

Applicant is required by Section 454.70 to demonstrate that it meets the technical qualifications necessary to provide services as an ABC. Applicant has demonstrated that it meets the technical qualifications set forth in Section 454.70 with the information provided in Attachment 2. Attachment 2 contains occupational background information on the person or persons being used to meet the requirements of Section 454.70(a).

Pursuant to the requirements of Section 454.80 of Part 454, Applicant provided a surety bond in the amount of \$5,000 issued by a qualifying surety authorized to transact business in Illinois. Applicant further agrees to comply with the Code of Conduct for ABCs contained in Section 454.90.

### **IV. COMMISSION CONCLUSION AND CERTIFICATE OF SERVICE AUTHORITY**

The Commission has reviewed the Application, Amended Application and attachments provided by Applicant regarding the technical, managerial, and financial requirements and all other requirements of the Act and Part 454 and finds that the Applicant sufficiently demonstrates compliance with the requirements. The Commission concludes, therefore, that Applicant's request for a certificate of service authority to operate as an ABC in Illinois should be granted and should include the following authority:

#### CERTIFICATE OF SERVICE AUTHORITY

IT IS CERTIFIED that Orzel Energy Solutions LLC is granted service authority to operate as an agent, broker, or consultant for the procurement or sale of retail electricity supply for third parties in the State of Illinois.

### **V. FINDINGS AND ORDERING PARAGRAPHS**

The Commission, having reviewed the entire record, is of the opinion and finds that:

- (1) Orzel Energy Solutions LLC, a business organized under the laws of New York and authorized to transact business in Illinois, seeks a certificate of service authority to operate as an ABC under Section 16-115C of the Act;
- (2) the Commission has jurisdiction over the party hereto and the subject matter hereof;
- (3) the recitals of fact and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) Orzel Energy Solutions LLC has demonstrated that it possesses sufficient financial, managerial, and technical resources and abilities to provide services as an ABC for the procurement or sale of retail electricity supply to third parties in the State of Illinois;
- (5) Orzel Energy Solutions LLC has complied with Section 16-115C of the Act and Part 454; and
- (6) Orzel Energy Solutions LLC should be granted a certificate of service authority to operate as an ABC as specified in this Order.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that Orzel Energy Solutions LLC is hereby granted a Certificate of Service Authority authorizing it to operate as an agent, broker, or consultant; said Certificate of Service Authority shall read as that set forth in Section IV of this Order.

IT IS FURTHER ORDERED that Orzel Energy Solutions LLC shall comply with all applicable Commission rules and orders now and as hereafter amended.

IT IS FURTHER ORDERED that pursuant to Section 10-113(a) of the Public Utilities Act and 83 Ill. Adm. Code 200.880, any application for rehearing shall be filed within 30 days after service of the Order on the party.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 31st day of August, 2023.

(SIGNED) DOUGLAS P. SCOTT

Chairman

**Exhibit 3**  
**MD License**

JASON M. STANEK  
CHAIRMAN

MICHAEL T. RICHARD  
ANTHONY O'DONNELL  
ODOGWU OBI LINTON  
MINDY L. HERMAN



## PUBLIC SERVICE COMMISSION

**#7, 11/17/21 AM; ML#s 236943 and 237293**  
**License Reference No.: IR-4806**

November 17, 2021

Chaim Orzel  
Orzel Energy Solutions, LLC  
1025 East 14<sup>th</sup> St, Apartment C2  
Brooklyn, NY 11230  
[chaimorzel@orzelenenergy.com](mailto:chaimorzel@orzelenenergy.com)

Dear Mr. Orzel:

On October 21, 2021, Orzel Energy Solutions, LLC (“Company”) filed an Application for a License to Supply Electricity or Electric Generation Services in Maryland under COMAR 20.51. The Company proposes to provide electricity supplier services in Maryland for residential, commercial and industrial customers as described in the application. Additional information was filed on October 5, 2021.

After considering this matter at the November 17, 2021 Administrative Meeting, the Commission granted the Company a license to supply electricity or electric generation services in Maryland (License Reference Number IR-4806). The license granted by the Commission under this Letter Order is limited solely to electricity supplier services for the customer classes and service territories applied for and recommended by Staff. Additionally, the Company is directed to pay a civil penalty in the amount of \$500 and is prohibited from offering variable rates in Maryland without prior Commission authorization. The Company is also directed to provide marketing materials specific to its Maryland operations to the Commission Staff and Office of People’s Counsel 30 days prior to utilization of the materials in Maryland.

Finally, the Company is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People’s Counsel.

By Direction of the Commission,

*/s/ Andrew S. Johnston*

Andrew S. Johnston  
Executive Secretary

ASJ/st

**Exhibit 3**  
**NJ License**



Philip D. Murphy  
Governor

Sheila Y. Oliver  
Lt. Governor

## State of New Jersey

BOARD OF PUBLIC UTILITIES  
44 South Clinton Avenue, 1<sup>st</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350  
[www.nj.gov/bpu/](http://www.nj.gov/bpu/)  
(609)777-3300

Joseph L. Fiordaliso  
President

Mary-Anna Holden  
Commissioner

Dianne Solomon  
Commissioner

Upendra Chivukula  
Commissioner

Bob Gordon  
Commissioner

August 18, 2021

Chaim Orzel, President  
Orzel Energy Solutions LLC  
1025 East 14<sup>th</sup> Street  
Apartment C2  
Brooklyn, New York 11230

Re: **Energy Agent Initial Registration**  
Docket No. EE21060931L

Dear Chaim Orzel:

In accordance with the Electric Discount and Energy Competition Act of 1999, N.J.S.A. 48:3-49 et seq., at its August 18, 2021 Agenda meeting, the New Jersey Board of Public Utilities voted to issue the **REGISTRATION** as an Energy Agent to Orzel Energy Solutions LLC. The company's registration number is EA-0680

This registration is effective August 18, 2021 and will expire on August 17, 2022. This registration and the rights thereunder are **Non-Transferable**.

***This letter is not an endorsement of, nor is it intended for use in, the marketing promotions of the registrant. Registrants shall comply with all applicable law, including the Electric Discount and Energy Competition Act, which prohibits the unauthorized change of a customer's energy provider and other fraudulent and illegal marketing activities.***

If you have any questions, please contact Jehvson Espiritu at (609) 292-0744.

Sincerely,

A handwritten signature in blue ink that reads "Aida Camacho-Welch".

Aida Camacho-Welch  
Secretary of the Board

ACW/joe

**Exhibit 3**  
**OH License**

## Competitive Retail Electric Service Provider Certificate

Certified Entity:  
Orzel Energy Solutions LLC

276 Fifth Ave Suite 704-3062  
New York, NY 10001

Certificate Number: **21-051445E**

**Effective Date: January 22, 2025**

**Expiration Date: January 22, 2027**

Issued Pursuant to Case Number(s):

**20-1812-EL-AGG**

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

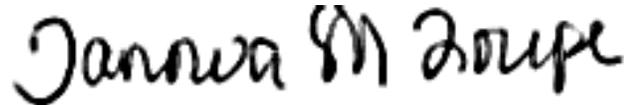
The certification of competitive retail electric service providers is governed by Chapters 4901:1-24 and 4901:1-21 of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code. This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met. 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: **22 day of January, 2025.**



By Order of  
The Public Utilities Commission of Ohio



Tanowa M. Troupe, Secretary  
Michelle Green, Acting Secretary  
Brian James, Acting Secretary  
Robert Fadley, Acting Secretary

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**1/22/2023 4:15:44 PM**

**in**

**Case No(s). 20-1812-EL-AGG**

**Summary: In the Matter of the Certificate of Orzel Energy Solutions LLC**

**Exhibit 3**  
**TX, Proof of Registration**

**From:** [James Kelsaw](#)  
**To:** [Hanrahan, Alexis](#)  
**Cc:** [chaimorzel@orzelenenergy.com](mailto:chaimorzel@orzelenenergy.com)  
**Subject:** P49779 Texas Electricity Broker Registration Item No. 3625 Orzel Energy Solutions LLC BR230284  
**Date:** Wednesday, September 27, 2023 10:04:22 PM  
**Attachments:** [image001.png](#)

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**Caution, this email may be from a sender outside Wolters Kluwer. Verify the sender and know the content is safe.**

Thank you for registering as a broker in the State of Texas. Your registration has been reviewed and your company has been assigned broker registration number **BR230284**.

Your registration must be renewed at least once every three years. You must renew at least 90 days before the expiration date. Your registration expires on 9/27/2026.

A list of the brokers can be found on our [website](#).

Please make sure that your information has been entered correctly.

If you have any questions, please don't hesitate to contact us.

Thanks,

**James Kelsaw**

**Utility Analyst**

**Consumer Protection Division**

**Licensing and Compliance**

Public Utility Commission of Texas

**W:** (512)936-7338 | [james.kelsaw@puc.texas.gov](mailto:james.kelsaw@puc.texas.gov)

**NOTICE:** Any opinions stated in this email may change with additional information and analysis. In addition, any opinions stated in this email do not represent an official Commission Staff opinion or Commission decision.