



**NRG Energy Inc.**  
Leah Gibbons  
2929 Arch Street, Ste. 1902  
Philadelphia, PA 19104  
lgibbons@nrg.com  
(301) 509-1508

**October 30, 2025**

Mr. Matt Homsher, Commission Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**DATE OF DEPOSIT**

**NOV - 3 2025**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

NRG Curtailment Solutions, Inc.  
4433 Genesee Street, Suite 401  
Buffalo, New York 14225

RE: Notice to Renew Registration as a Conservation Service Provider (A-2017-2630375)

Dear Secretary Homsher,

Attached please find an application to renew the Conservation Service Provider Registration for NRG Curtailment Solutions, Inc. We have included the \$25 re-registration Application fee along with the application, Check No. 7100086.

DATE OF DEPOSIT

**APPLICATION FOR RENEWAL OF CSP REGISTRATION  
CHANGES INCURRED TO APPLICATION OF RECORD**

NOV - 3 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

***Applicant (Company) Name and Docket No.:***

NRG Curtailment Solutions, Inc. ("NRGCS") and Docket No.: A-2017-2630375

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***Contact Information (name, address, phone number and email of person filing application):***

Name & Phone Number: Ryan Harwell (281) 800-6157

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Address: 910 Louisiana Street, Houston, Texas 77002

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Email: Ryan.harwell@nrg.com

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*On behalf of the Applicant I am filing with the Commission this Application for Renewal of CSP Registration. There are one or more CHANGES to Applicant's CSP Application of record on file at the Commission at the Docket Number as indicated herein.*

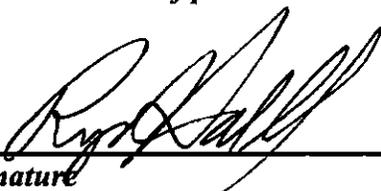
I have reviewed the Applicant's CSP Application of record and the information contained therein has changed. Enclosed are the following items:

- a. Completed CSP Application;
- b. Renewal application fee of \$25;
- c. Affidavit, attesting to the truth and knowledge of these facts; and
- d. Proof of current liability insurance coverage.

*RYAN HARWELL - SENIOR REGULATORY LICENSING & REPORTING MANAGER*

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***Name and Title of person authorized by Applicant to file this Application***



***Signature***

*11/3/25*

***Date***

The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application for Renewal of Conservation Service Provider Registration, 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.

## CONSERVATION SERVICE PROVIDER ("CSP") APPLICATION FOR REGISTRATION IN THE COMMONWEALTH OF PENNSYLVANIA

Conservation Service Providers ("CSPs") have a specific role under Act 129, which requires a covered Electric Distribution Company's Energy Efficiency and Conservation (EE&C) plan to include one or more CSPs to implement at least a portion of the EE&C Plan. 66 Pa.C.S. § 2806.1(b)(1)(i)(E). CSPs provide information and technical assistance to EDCs on *measures* that enable a person to increase energy efficiency or reduce energy consumption. CSPs must have no direct or indirect ownership, partnership or other affiliated interest with an EDC. 66 Pa.C.S. § 2806.1 (m). Only registered CSPs may advise an EDC and/or provide consultation, design, or administration or management services to an EDC related to the implementation of the EDC's EE&C Plan. As such, registration of business entities as approved CSPs is required before entering into a contractual agreement with an EDC exclusively for the provision of consultation, design, administration, management or advisory services regarding that EDC's EE&C plan. This registry is not intended as a resource for business, whose sole purpose is the installation of measures, supplying of equipment or other contracting work for use by the general public and EDC customers. If providing such services, registration as a CSP is not required for entering into an agreement with an EDC.

Any CSP subcontractor with an annual contract cost that equals or exceeds 10% of the CSP annual contract cost and is directly performing services pursuant to a contract with a CSP which has contracted with an EDC after Commission approval should also register as a CSP. This does not include third party contractors which participate in or support an EE&C Plan but are not directly contracted with a CSP which has a direct contractual relationship with the EDC subject to Act 129.

To qualify an applicant must have at least two years of experience in providing program consultation, design, administration, management or advisory services related to energy efficiency and conservation services. CSP registration is not required of entities that limit their services to the installation of energy efficiency measures or the provision of equipment or materials to EDC customers or the public in general.

### 1. **IDENTITY OF THE APPLICANT**

- a. Legal Name of Applicant: NRG Curtailment Solutions, Inc. ("NRGCS")

Attach proof of compliance with appropriate Pennsylvania Department of State filing requirements.<sup>1</sup>

Please see Attachment A.

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<sup>1</sup> A copy of any document from the Pennsylvania Department of State (Pa. Dept. of State) documenting the Applicant's Pa. Dept. of State entity number is adequate. However, the document must indicate that the Applicant's Pa. Dept. of State registration is "active." Certified copies of Pa. Dept. of State documents are not required.

b. Trade or Commercial or Fictitious Names Used by Applicant (d/b/a)—List all that apply.

The Applicant will be using a fictitious name or doing business as (“d/b/a”). Identify names below. If more space is needed, list names on the back of this page or append list to completed application.

The Applicant will not be using a fictitious name.

c. Applicant Address: 804 Carnegie Center  
Princeton, NJ 08540

d. Applicant Telephone No: (716) 906-5100

e. Applicant Email Address: Scott.hart@nrg.com

f. Contact Information for Applicant. PLEASE NOTE: Upon approval of this application, this Contact Information will be listed on the Commission’s CSP Registry.

- Name Ashley Gebler
- Mailing Address 804 Carnegie Center  
Princeton, NJ 08540
- Telephone (716) 906-5334
- Email Address Ashley.gebler@nrg.com

g. Predecessor(s) & Other Names used by Applicant for past five (5) years of date of this application. Provide Name(s), Address(es) and Telephone No.(s).

Check Box if any Predecessor(s) is currently or was previously registered in Pennsylvania as a CSP. If affirmative, please provide Docket No(s). (A-[Year]-[Seven (7) Digits]) and names for all registered CSPs.

NRGCS has held a CSP registration in the name of Energy Curtailment Specialists, Inc. ("ECS"), which was NRGCS's predecessors in name only (i.e., the parent company and ownership structure remains the same, only ECS's name was changed to NRGCS). The initial license was issued pursuant to the Commission's order in Docket No. M-2008-2074154.

h. Parent & Subsidiary Companies & Affiliates:

- Parent Name and Contact Information. Provide name and contact information for parent company. Check Box if any parent company is currently doing business in Pennsylvania as a CSP or Electric Distribution Company (EDC). If "None," do not check the box and answer "None" below.

NRG Energy, Inc. None  
 804 Carnegie Center  
 Princeton, NJ 08540  
 Phone: 609-524-4500

- Subsidiaries and Contact Information. Provide name and contact information for all subsidiary companies. Check Box if any subsidiary is currently doing business in Pennsylvania as a CSP or Electric Distribution Company (EDC). If "None," do not check the box and answer "None" below.

None

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- Affiliate(s) and Contact Information. Provide name and contact information for all affiliate companies. Check Box if any affiliate is currently doing business in Pennsylvania as a CSP or Electric Distribution Company (EDC). If "None," do not check the box and answer "None" below.

Please see Attachment B.

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i. Contracts & Business Partnerships:

- Check Box if Applicant intends to or has operated under contract with or has partnered with an EDC within the past five (5) years. If "None," do not check the box and answer "None" below.
- Check Box if Applicant intends to or has operated under contract (subcontractor) with or has partnered with a CSP within the past five (5) years. If "None," do not check the box and answer "None" below.

**If any box above is checked, please provide name(s) of EDC(s) and CSP(s) and contact information for each and briefly describe the nature of business services associated with each contract and/or partnership.**

Please see Attachment C.

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- j. Identify principal officers (owners, executives, partners and/or directors), as appropriate for Applicant's organizational structure. Provide an organizational chart and the names, titles, business addresses and telephone numbers for each office.

Please see Attachment D.

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- k. Attach to this Application a brief biography or single page professional resume for all principal officers and management directly responsible for Applicant's operations.

- l. Provide Applicant's Employer Identification No. (EIN): 20-046-2805

2. **REGISTERED AGENT**

- a. If the Applicant does not maintain a principal office in the Commonwealth, the Applicant is required by the Pennsylvania Department of State to designate an approved Registered Agent as its representative in the Commonwealth. Check one of the Boxes below, as applicable:

- YES, the Applicant has registered its business with the Pennsylvania Department of State. Following is the Name and Contact information for the Applicant's Department-Approved Registered Agent.

- Registered Agent's Name CT Corporation
- Registered Agent's Mailing Address 600 N 2nd St., Suite 401  
Harrisburg, PA 17101
- Registered Agent's Telephone 717-931-5563
- Registered Agent's Email Address Ct\_support@wolterskluwer.com

- NO, the Applicant has not registered its business with the Pennsylvania Department of State. STOP—To avoid denial of your application and forfeiture of your application fee, you should contact the Pennsylvania Department of State Bureau of Corporations to register as a business entity within the Commonwealth PRIOR TO completion and filing of this application with the Pennsylvania Public Utility Commission.

b. Applicant has registered its business with the Pennsylvania Department of State. Please check appropriate registration type for Applicant as designated with the Department.

- Sole proprietor (15 Pa. C.S. §4124)
- Domestic corporation (none)
- Domestic general partnership (15 Pa. C.S. §4124)
- Domestic limited liability company (15 Pa. C.S. §8913)
- Domestic limited liability partnership (15 Pa. C.S. §8201)
- Foreign corporation (15 Pa. C.S. §4124)
- Foreign general or limited partnership (15 Pa. C.S. §4124)
- Foreign limited liability company (15 Pa. C.S. §8981)
- Foreign limited liability general partnership (15 Pa. C.S. §8211)
- Foreign limited liability limited partnership (15 Pa. C.S. §8211)

c. If Applicant is not domiciled in the Commonwealth of Pennsylvania and is registered as a "foreign" entity as identified in Question 2.b., please identify all other states where applicant is registered and name the appropriate state department(s):

California - California Secretary of State  
Connecticut - Connecticut Secretary of State  
Delaware - Delaware Department of State  
D.C. - Office of the Secretary of District of Columbia  
Illinois - Illinois Secretary of State  
Indiana - Indiana Secretary of State  
Kentucky - Kentucky Secretary of State  
Maryland - Office of the Secretary of State  
Minnesota - Minnesota Secretary of State  
New Jersey - New Jersey Department of State  
Ohio - Ohio Secretary of State  
Pennsylvania - Pennsylvania Department of State  
Texas - Texas Secretary of State  
Virginia - Virginia Secretary of State  
Washington - Washington Secretary of State  
West Virginia - West Virginia Secretary of State

**3. APPLICANT'S OPERATIONS**

Respond to each of the following four questions relating to Applicant's operations and its technical and financial fitness. Respond to each item and attach any additional information and/or statements to this Application as appropriate.

a. Describe nature of business:

NRG CS is a third-party demand response provider or Curtailment Service Provider (CSP) providing Demand Response Services to end-use customers in the Commonwealth of Pennsylvania. NRGCS participates in PJM's wholesale market as a CSP and has participated in the ACT 129 program under partnership with CPower as listed above under Contracts and Partnerships. Please see Attachment E.

b. Current status of business (check one):

- Applicant is presently doing business in Pennsylvania
- Applicant is presently not doing business in Pennsylvania

c. The Applicant proposes to provide the following information and technical services to an EDC. Check all services that apply and identify all EDCs with whom Applicant intends to conduct business.

- |   |       |       |
|---|-------|-------|
| <input type="checkbox"/> Consultation   | EDCs: | _____ |
| <input type="checkbox"/> Design         |       | _____ |
| <input type="checkbox"/> Administration |       | _____ |
| <input type="checkbox"/> Management     |       | _____ |
| <input type="checkbox"/> Advisory       |       | _____ |

d. Attach to this Application a copy of any certification(s) or similar documentation that would demonstrate the technical fitness of Applicant; such as membership in trade associations, professional licenses, technical certifications, and/or names of current or past clients with a description of dates and types of services provided by Applicant.

e. Attach to this Application proof of current liability insurance coverage.  
Please see Attachment F.

4. **COMPLIANCE**

Respond to each of the following Questions. Provide a statement as to the resolution or present status of any such proceedings, if applicable.

- a. In the past three years has the Applicant, the parent company, an affiliate or predecessor or partner (contractor/subcontractor business relationship) of the Applicant, or any person identified by the Applicant in this Application, been investigated or convicted of a crime involving fraud, theft, larceny, deceit, violation of consumer protection law, violation of deceptive trade law or similar activity, whether before an administrative body or in a judicial forum, in which the Applicant, an affiliate, a predecessor of either, or a person identified herein has been a defendant or a respondent?

- No
- Yes. Provide explanation:

None of the above apply, with the exception of non-criminal administrative proceedings around consumer protection and related statutes, as described in Attachment G.

- b. Is the Applicant, the parent company, an affiliate, or a predecessor of either, currently delinquent with any state or federal taxing authority?

- No
- Yes. Provide explanation:

- c. Identify all bankruptcy or liquidation proceedings for the prior three years. If none, state "None" below.

None

- d. Identify all customer complaints filed with a regulatory or prosecutor agency for the prior three years of the date of this application. In none, state "None" below.

Please see Attachment H.

5. **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.

Signature of Principal Official: 

Official's Name & Title : Scott B. Hart - President, NRG Curtailment Solutions, Inc.  
(Please Print)

Date : 10-30-2025

DATE OF DEPOSIT

NOV 3 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

APPENDIX A - AFFIDAVIT

DATE OF DEPOSIT

[Commonwealth/State] of Texas :

NOV - 3 2025

SS.

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

County of Harris :

Scott B. Hart, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the President (Office of Affiant) of NRG Curtailment Solutions, Inc. (Name of Applicant);]

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

NRG Curtailment Solutions,  
That the Applicant herein Inc. has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be registered as a conservation service provider pursuant to Act 129 of 2008.

NRG Curtailment Solutions,  
That the Applicant herein Inc. acknowledges that it has answered the questions on the application correctly, truthfully and completely and has provided supporting documentation as required.

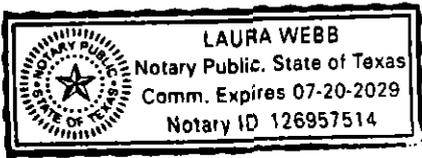
NRG Curtailment Solutions,  
That the Applicant herein Inc. acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

NRG Curtailment Solutions,  
That the Applicant herein Inc. 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.

  
Signature of Affiant

Sworn and subscribed before me this 30 day of October ~~November~~, 20 25.



Laura Webb  
Signature of official administering oath

My commission expires: 07-20-2029

**Attachment A – Commonwealth of Pennsylvania proof of compliance**

**DATE OF DEPOSIT**

**NOV - 3 2025**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**



DSCB:15-413 - 2

5. Check, and if appropriate complete, one of the following:

The association desires that its registration be amended to change or correct the following information:

The name of the corporation has been changed to: NRG Curtailment Solutions, Inc.

The amendment adopted by the association is set forth in full in Exhibit A attached hereto and made a part hereof.

If the amendment reflects a change in name for the association which does not comply with 15 Pa.C.S. § 414 and §§ 201-209, the foreign association must adopt an alternate name that complies with 15 Pa.C.S. §§ 201-209 for use in Pennsylvania and a resolution from the association's governors adopting the name must be attached.

IN TESTIMONY WHEREOF, the undersigned association has caused this Amendment of Foreign Registration Statement to be signed by a duly authorized representative thereof this 14th day of September 2015.

NRG Curtailment Solutions, Inc.

Name of Association

Deborah R. Fry

Signature

Deborah R. Fry, Assistant Secretary

Title

Homepage - The Hub x Regulatory Licensing and x Account Summary | FedEx x Google x Search | An Official Pennsylv...

https://file.dos.pa.gov/search/business

Access required: Regulatory Obligati... Insider - Home Customer Electric C... Electric Supply | MP... Natural Gas Compa... PIM System Ma Electricity Delivery |

An Official Pennsylvania Government Website

**pennsylvania**  
DEPARTMENT OF STATE

Business UCC Trademark CROP Login

Home

Search

Initial Forms

Help

## Business Search

As of 10/14/2025 we have processed all business filings received in our office through 10/09/2025.

Business Search Info

NRG Curtailment Solutions Inc

Advanced

Results

Filing Information	Initial Filing Date	Status	Entity Type	Formed In	Address
NRG Curtailment Solutions, Inc. (3886119)	06/05/2009	Active	Foreign Business Corporation	NEW YORK	CT Corporation System

Request Certificate

Initial Filing Date: 06/05/2009

Status: Active

Formed In: NEW YORK

Filing Type: Foreign Business Corporation

Principal Address: 804 CARNEGIE CENTER PRINCETON, NM 08540

Registered Office: CT Corporation System

County: Dauphin

Officers:

- President: Scott B. Hart
- Vice President: William Evans
- Vice President: A. Louis Teuscher
- Vice President: Shawnie McBride

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# Attachment B

DATE OF DEPOSIT

NOV -3 2025

PA PUBLIC UTILITY COMMISSION  
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## **Attachment B (Affiliates)**

**Affiliate Name: Direct Energy Services, LLC**

**910 Louisiana Street, Houston, TX 77002**

**Docket No. A-2025-3056586**

**Affiliate Name: NRG Business Marketing LLC**

**804 Carnegie Center, Princeton, NJ 08540**

**Docket No. A-2013-2364766**

**Affiliate Name: Reliant Energy Northeast LLC**

**804 Carnegie Center, Princeton, NJ 08540**

**Docket No. A-2025-3056585**

**Affiliate Name: Vivint LLC**

**804 Carnegie Center, Princeton, NJ 08540**

**Docket No. A-2025-3056653**

# Attachment C

REDACTED

DATE OF DEPOSIT

NOV -3 2025

PA PUBLIC UTILITY COMMISSION  
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Attachment C (REDACTED)

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# Attachment D

DATE OF DEPOSIT

NOV -3 2025

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SECRETARY'S BUREAU

**Robert J. Gaudette; Executive Vice President; NRGCS Officer Title: Director and Senior Vice President**  
**910 Louisiana Street, Houston, TX 77002**

Robert Gaudette is Executive Vice President, NRG Business where he oversees the company's broad portfolio of commercial and industrial products and services and oversees the company's market operations, including gas trading, power trading, origination, commercial analytics, and real-time operations.

Under his leadership, Robert's team manages supply and optimization in support of teams across NRG and utilizes its commercial and market expertise to help customers manage their energy strategy and reach their energy goals. Partnering with customers, Robert and his team increase efficiencies, reduce costs, and manage risks---creating a more sustainable, resilient, affordable, and empowering energy ecosystem for NRG customers.

Prior to joining NRG, he served as Chief Commercial Officer at GenOn Energy, leading all trading and marketing operations. Before GenOn, he was Vice President of Mirant's Mid-Atlantic business unit in Washington D.C. During his career at Mirant, Robert worked in various other capacities including Director of West Power, Director of NYMEX Trading, Assistant to the Chief Operating Officer, and NYMEX trader. He began his career at Mirant in 2001 as a Trading Analyst.

Earlier, he served four years as an army combat engineer officer in the U.S. Cavalry, including a one-year deployment to Bosnia. Before leaving military service for business school in 1999, he served as the executive officer of a combat engineer company in the Second Armored Cavalry Regiment.

Robert earned a Bachelor of Science degree in chemistry from The College of William and Mary and a Master of Business Administration from Rice University, where he was a Jones Scholar.

He is a board member of the Business Council for Sustainable Energy. Robert also serves on the Board of Advisors at the Jones Graduate School of Business at Rice University and is a board member at St. Agnes Academy. In addition, he serves on the regional economic development committee of the Greater Houston Partnership.

**Scott B. Hart; Senior Vice President, Business Sales; NRGCS Officer Title: President**  
**910 Louisiana Street, Houston, TX 77002**

Scott Hart is Senior Vice President of NRG Business – and leads an integrated sales organization comprised of commercial, industrial, and wholesale origination sales teams. Scott is continuing to lead the team to become a competitive participant in many retail markets to offer customized solutions and services to customers in the complex energy industry.

Scott has more than 30 years of utility and competitive retail executive experience and prior to leading the NRG Supply team, Scott was the President of Commercial Services for Green Mountain Energy before it was acquired by NRG in 2010. Scott has a Bachelor of Science degree from Tarleton State University and MBA from Baylor University.

**Jean-Pierre Breaux; Treasurer; NRGCS Officer Title: Vice President and Treasurer**

804 Carnegie Center, Princeton, NJ 08540

Phone: 609-524-5145

JP serves as treasurer for NRG.

Prior to joining NRG Energy, in July 2023, JP served as Treasurer with Montana Renewables, LLC from 2021. Previously, he was Treasurer for Calumet Specialty Products Partners, L.P. from 2018 to 2021. Prior to this, he was Treasurer for Carrizo Oil & Gas, Inc. from 2015 to 2018. Prior to this role, he was Treasurer with Energy XXI from 2011 to 2015.

JP received his BBA from Texas A&M University as well as Master of Science in Finance from Texas A&M University in 2005. JP is a Certified Treasury Professional and Energy Risk Professional. He resides in Princeton, NJ with his family.

**Shawnie McBride, SVP & Chief Risk Officer; NRGCS Officer Title: VP**

910 Louisiana Street, Houston, TX 77002

(732) 781-0488

Shawnie McBride serves as Senior Vice President and Chief Risk Officer for NRG Energy.

Shawnie has been with Direct Energy and now NRG since 2011 where she has held multiple leadership roles. This includes being Chief Risk Officer for Direct Energy as well as Vice President of Sales Operations and Process Excellence. Prior to joining Direct Energy in 2011, Shawnie served as Vice President at Energy Future Holdings for 4 years. Before that, she was a Manager of Trading Controls at Mirant in 2001.

Shawnie received her BBA in 2001 from Texas A&M University. Moreover, she has acquired Executive Leadership, Risk Management, and Business Process Improvement skills over the years in various roles she has held.

Shawnie lives with her family in Houston.

**Aloys Louis Teuscher, Vice President, Tax; NRGCS Officer Title: VP**

910 Louisiana Street, Houston, TX 77002

(832) 948-0939

Mr. Teuscher joined NRG in February 2022. From March 2017 to January 2022, he was Vice President, Tax for the Williams Companies Inc. in Tulsa, OK. From 2009 to 2017, Louis was Vice President, Tax for Talisman Energy Inc (Houston/Calgary), a global oil & gas company and since 2006 he was Global Tax Director with Kraton Polymers Holdings (Houston). Prior to 2006, Mr. Teuscher held several senior tax positions with Schlumberger in the U.S., Europe, and Asia.

A CTA (Certified Tax Accountant), Louis holds an U.S. Masters in Taxation from the University of Tulsa, as well as a European BBA with an emphasis in Taxation and Auditing. He is a graduate of the Advance Management Program at Harvard Business School. Mr. Teuscher is also a Certified Tax Accountant.

# Attachment E

DATE OF DEPOSIT

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## Attachment E

### Operations

NRG Curtailment Solutions, Inc. ("NRGCS") is a subsidiary of NRG Energy that specializes in demand response services. NRGCS helps commercial and industrial customers reduce electricity usage during peak demand periods, which benefits both the electric grid and the participating businesses.

To support these functions, NRGCS maintains key operations such as. Energy Reduction Programs: NRGCS works with over 6,500 facilities to implement energy reduction strategies during grid emergencies or peak usage times. Operations are run out of the Buffalo, NY office buildings, with operation across various U.S. states. Customer Incentives: Participating businesses receive financial rewards for reducing energy consumption when requested. Monitoring & Verification: They use interval meter data to track and verify energy reductions. Consulting Services: NRGCS provides energy efficiency consulting, bill management, and energy procurement services.

# Attachment F

REDACTED

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[REDACTED]

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

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# **Attachment G**

**DATE OF DEPOSIT**

**NOV -3 2025**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

The Applicant is a wholly owned subsidiary of NRG Energy, Inc. and has dozens of affiliates operating throughout North America. Relevant and material litigation for NRG's businesses is presented in its public filings with the SEC. The Applicant has no responsive criminal history to report. Responsive and relevant actions docketed by government entities in the United States are reported below.

#### ***XOOM Energy Ohio, LLC***

In June 2021, the Public Utilities Commission of Ohio ("PUCO") issued a notice of probable non-compliance to XOOM Energy Ohio, LLC ("XOOM Energy"), citing concerns with XOOM Energy's compliance with marketing, sales, and enrollment regulations in Ohio. In April 2022, the PUCO opened a formal investigation into these same issues. Thereafter, XOOM Energy entered into a stipulation with PUCO Staff to settle the matter. Under the terms of the settlement, XOOM Energy did not admit wrongdoing but will: (i) pay a forfeiture of \$120,000; (ii) pay \$100,000 to the Dollar Energy Fund to be used as bill payment assistance; (iii) provide refunds to affected customers; and (iv) implement corrective actions to monitor enrollments. PUCO approved the settlement on April 17, 2024.

#### ***Direct Energy Services, LLC – Ohio***

In June 2021, the Public Utilities Commission of Ohio ("PUCO") issued a Notice of Probable Non-compliance to Direct Energy Services ("DES"), citing concerns with DE's compliance with marketing, sales, and enrollment regulations in Ohio. Thereafter, on June 10, 2022, DES and PUCO Staff signed a joint stipulation of settlement in the matter. The Ohio Office of Consumer Counsel later intervened, and DES and PUCO Staff agreed to update the terms. Under the revised settlement, which PUCO has approved, DES will pay a forfeiture of \$275,000, pay \$100,000 to Dollar Energy Fund to be used as bill payment assistance, work with the PUCO Staff to remedy any harm to customers, and agree not to use digital TPVs for a period of 12 months following approval of the settlement. PUCO approved the settlement on April 17, 2024.

#### ***Reliant Energy Retail Services LLC***

The Texas Public Utility Commission alleged that on 701 occasions between January 1, 2022 and April 23, 2023, Reliant violated a PUCT rule regarding billing by failing to provide monthly bills to residential and small commercial customers. This occurred during a period when the transmission distribution service provider wasn't sending meter read or estimation data used for the issuance of bills. In addition to making efforts to ensure all customers received monthly bills, Reliant agreed to pay an administrative penalty of \$50,100 and make a bill payment assistance donation of \$20,000 to settle the alleged violations.

#### ***US Retailers, LLC***

The Texas Public Utility Commission alleged that from September 1, 2021 to August 31, 2023, US Retailers used an Electricity Facts Label that identified a disconnection notice fee of \$10, while the Terms of Service for those customers identified the disconnection notice fee of \$20. During this period, 43,227 customers on approximately 109,973 occasions were charged a \$20 fee for disconnection notices. The PUCT alleged this was a violation of PUCT rule and statutory provisions for reasons including that the communications were unclear, unfair, misleading, and deceptive. In addition to correct the discrepancy, US Retailers

disbursed the difference in the fees through refunds to customers as able, and donations to bill payment assistance agencies where former customers weren't located. Further, US Retailers agreed to an administrative penalty of \$255,462 for alleged and acknowledged violations.

### ***XOOM Energy Connecticut, LLC***

On June 29, 2023, the Connecticut Public Utilities Regulatory Authority approved a Settlement Agreement between the Office of Education, Outreach, and Enforcement ("EOE") and XOOM Energy Connecticut, LLC ("XOOM Energy") that resolved a Notice of Violation issued by the Authority on March 15, 2023. The Notice of Violation alleged that XOOM Energy failed to comply with a 2021 law prohibiting the charging of cancellation fees to residential customers. XOOM Energy included language about cancellation fees in certain customer-facing materials, although the company did not charge nor collect such fees from customers. Under the terms of the Settlement, XOOM Energy will pay a total of \$1.5 million to the electric distribution companies Connecticut Light & Power and United Illuminating for application to customer bills to reduce hardship customer arrearages and will also provide bill credits in the amount of \$75 to affected residential customer accounts. Additionally, XOOM Energy pledged to remove any remaining references to cancellation fees from customer-facing materials.

### ***Direct Energy Services, LLC; Energy Plus Holdings LLC; Energy Plus Natural Gas LLC; Gateway Energy Services Corporation; Green Mountain Energy Company; Reliant Energy Northeast LLC; Stream Energy New York, LLC; XOOM Energy New York, LLC – New York***

On January 8, 2024, the NYPS&C notified eight of NRG's retail energy suppliers (serving both electricity and natural gas) of alleged non-compliance with New York regulatory requirements. Among other items, the notices allege that the NRG suppliers did not, following April 16, 2021 (which was the effective date of the NYPS&C's December 2019 Order Adopting Changes to the Retail Access Energy Market and Establishing Further Process), transition its existing residential customers to one of three newly-created products authorized by the NYPS&C. NRG is responding to the notices.

### ***Direct Energy Services, LLC - Illinois***

On April 16, 2025, the Circuit Court of Cook County Illinois approved and entered a Consent Decree settling a complaint filed against Direct Energy Services, LLC ("Direct Energy") by the Attorney General of the State of Illinois ("IL AG"), case no. 25CH4091. The IL AG alleged generally that Direct Energy had violated state consumer protection laws and the state's telemarketing law related to the marketing and sale of electricity to residential consumers in Illinois. Direct denied these allegations and without trial or any finding of fact or admission of liability, agreed to settle and: (1) pay approximately \$9.37 million in restitution to residential consumers; (2) pay \$750,000 for the costs of settlement administration and third-party monitoring of marketing; (3) suspend active marketing to residential consumers through December 1, 2025; (4) when it resumes marketing, agree to third-party monitoring for 2 years, additional training, and marketing restrictions; and (5) pay attorneys' fees and associated costs approximating \$1.87 million.

### ***Direct Energy Services, LLC – New Jersey***

In January 2025, Direct Energy Services, LLC (DES) discovered that it had inadvertently overbilled some customers it served as part of the Hoboken, NJ government energy aggregation program (GEA). DES took steps to refund all overbilled customers and self-reported the issue to the NJ

Board of Public Utilities (BPU). The New Jersey Rate Counsel then filed an inquiry with discovery requests related to DES' billing errors under the Hoboken, NJ GEA. DES responded to these discovery requests, and, to date, no further action has been taken. (BPU Docket Nos." EO20030275, EO23060404, and EO23060419).

***Vivint Smart Homes, Inc.***

In April 2021, the Federal Trade Commission (FTC) filed a complaint against Vivint Smart Homes, Inc., alleging that the company misused credit reports to secure financing for unqualified customers in violation of consumer protection laws. Vivint neither admitted nor denied the allegations as part of the settlement and agreed to a combination of a payment of a civil penalty, consumer refund, and ongoing injunctive relief and monitoring.

The North Carolina Alarm Licensing Board investigated Vivint in connect with its past sales practices. The parties reached an amicable resolution whereby the Board found no violations of state regulations and Vivint agreed to halt sales and marketing in the state for 30 days.

# Attachment H

DATE OF DEPOSIT

NOV -3 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**NRG Curtailment Solutions, Inc. Customer Complaints**

2022 Complaints	PA	2023 Complaints	PA	2024 Complaints	PA	2025 Complaints	PA
January		January		January		January	
February		February		February		February	
March		March		March		March	
April		April		April		April	
May		May		May		May	
June		June		June		June	
July		July		July		July	
August		August		August		August	
September		September		September		September	
October		October		October		October	
November		November		November		November	
December		December		December		December	
	0		0		0		0

ORIGIN ID:EIXA (409) 351-0184  
JERE' BROUSSARD  
910 LOUISIANA STREET  
HOUSTON, TX 77002  
UNITED STATES US

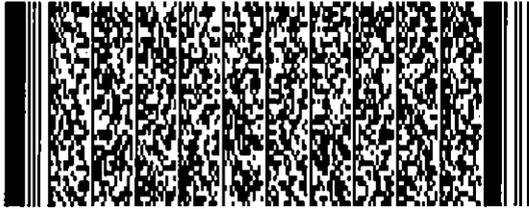
SHIP DATE: 03NOV25  
ACTWGT: 1.00 LB  
CAD: 252037484/NET4535

BILL SENDER

TO **COMM. SECRETARY, MATT HOMSHER**  
**PENNSYLVANIA PUB. UTILITY COMMISSIO**  
**400 NORTH STREET, KEYSTONE BUILDING**  
**2ND FLOOR, ROOM-N201**  
**HARRISBURG PA 17120**

58412/501C/59F2

(281) 800-6157 X 1 REF: ABND  
INV: PO: DEPT:

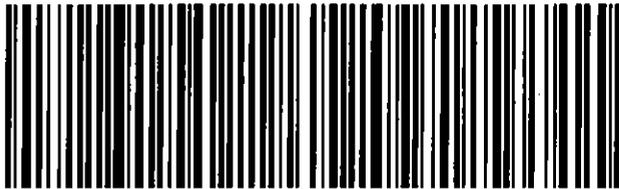


TUE - 04 NOV 10:30A  
PRIORITY OVERNIGHT

TRK# 8857 1707 5770  
0201

**XX MDTA**

17120  
PA-US MDT



RECEIVED

NOV - 4 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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**CONSIGNEE COPY - PLEASE PLACE IN FRONT OF POUCH**  
1. Fold the printed page along the horizontal line.  
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