

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Rate Raven Inc, d/b/a Rate Raven Inc, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) [as specified in item #4b below] to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

- a. **IDENTITY OF THE APPLICANT:** Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:

Rate Raven Inc.
P.O. Box 111
Pocopson, PA 19366
Telephone: 610-731-4212
Email: tim@therateraven.com
Website: www.therateraven.com

- 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.

The Applicant designates ZenBusiness Inc. as its registered agent for service of process in the Commonwealth of Pennsylvania.
Registered Agent: ZenBusiness Inc.
2040 Linglestown Road, Suite 10
Harrisburg, PA 17110

- 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.

Regulatory Contact Person:
Timothy Rivas, President / CEO
Telephone: 610-731-4212
Email: tim@therateraven.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.

None

- 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.

Primary: Timothy Rivas, President / CEO
Telephone: 610-731-4212
Email: tim@therateraven.com
Secondary: Andrew Harkness, Chief Operating Officer
Telephone: 484-885-9439
Email: andrew@therateraven.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 DSCB: 54-311.

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. § 412 relating to Department of State filing requirements.

OR

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa.C.S. § 8621)
- foreign general or limited partnership (15 Pa.C.S. §§ 411 and 412)
- domestic limited liability partnership (15 Pa.C.S. §§ 8201 and 8221)
- foreign limited liability general partnership (15 Pa.C.S. §§ 411 and 412)
- foreign limited liability limited partnership (15 Pa.C.S. §§ 411 and 412)

- 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. §§ 411 and 412.

OR

The Applicant is a:

- domestic corporation (15 Pa.C.S. § 1308)
- foreign corporation (15 Pa.C.S. §§ 411 and 412)
- domestic limited liability company (15 Pa.C.S. § 8821)
- foreign limited liability company (15 Pa.C.S. §§ 411 and 412)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- 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.

Owners / Officers / Directors:
Timothy Rivas – President / CEO
Andrew Harkness – Chief Operating Officer

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

- a. **AFFILIATES:** Give name and address of any affiliates currently doing business and state whether the affiliates 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.

The Applicant has no affiliates currently doing business. The Applicant has no affiliates that are currently applying to do business in Pennsylvania.

- b. **PREDECESSORS:** Identify any predecessors of the Applicant and provide the names under which the Applicant has operated, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

The Applicant has no predecessors that have done business.

- c. **RELATED DOCKET NUMBERS:** Provide the Docket Numbers for any previous Pennsylvania PUC licenses for the Applicant, all affiliates, and any predecessors. If the Applicant does not have any related Docket Numbers, explicitly state so.

The Applicant has no related Docket Numbers.

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.

Rate Raven Inc. will operate exclusively as a Broker/Marketer providing an unbiased concierge service to residential and small commercial customers. The Company will scan utility bills, shop for the lowest fixed-rate electricity supply plans from licensed suppliers using official state sources, generate Letters of Authorization, facilitate customer switches to lower rates, provide ongoing monthly rate monitoring, and send usage spike alerts. The Company earns revenue solely from monthly customer subscription fees and will not take title to electricity or make payments on behalf of customers.

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

- | | |
|--|---|
| <input type="checkbox"/> Citizens' Electric | <input type="checkbox"/> PECO |
| <input type="checkbox"/> Duquesne Light | <input type="checkbox"/> Pike |
| <input type="checkbox"/> FirstEnergy PA - Met-Ed | <input type="checkbox"/> PPL |
| <input type="checkbox"/> FirstEnergy PA - Penelec | <input type="checkbox"/> UGI Utilities |
| <input type="checkbox"/> FirstEnergy PA - Penn Power | <input type="checkbox"/> Wellsboro |
| <input type="checkbox"/> FirstEnergy PA - West Penn | <input checked="" type="checkbox"/> Entire Commonwealth of PA |

e. **CUSTOMERS:** Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (25 kW and Under)
- 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.

May 1, 2026

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.

The Applicant, any affiliate, any predecessor, and any person identified in this Application has not been or is not currently the defendant of any 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.

The Applicant, any affiliate, any predecessor, and any person identified in this Application has no formal or escalated actions or complaints filed against it in the Commonwealth of Pennsylvania or any other state, including any actions filed with customers, regulatory agencies, or prosecutory agencies. The Applicant has never had a Pennsylvania PUC EGS or NGS license cancelled by the Commission.

- 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.

There are no proceedings or actions to report. The Applicant will maintain full compliance with all applicable Pennsylvania Public Utility Commission rules and regulations if licensed.

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 Sections 1.57, 1.58, and 54.32(d) of the Commission's Regulations, 52 Pa. Code §§ 1.57, 1.58, and 54.32(d), 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 Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

- b. **EDCs:** Pursuant to Sections 1.57, 1.58, and 54.32(d) of the Commission's Regulations, 52 Pa. Code §§ 1.57, 1.58, and 54.32(d), provide Proof of Service of the Application and attachments upon each Electric Distribution Company the Applicant proposes 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: Duquesne Light Company Regulatory Affairs 411 Seventh Street, MD 16-4 Pittsburgh, PA 15219</p>
<p>FirstEnergy Pennsylvania Electric Company: FirstEnergy Pennsylvania Electric Company Legal Department 341 White Pond Drive Akron, OH 44320</p>	<p>PECO: PECO Energy Company Manager Energy Acquisition 2301 Market Street Philadelphia, PA 19101-8699</p>
<p>Pike County Light & Power Company: Corning Natural Gas Holding Corporation Vice President – Energy Supply 330 West William Street Corning, NY 14830</p>	<p>PPL: PPL Office of General Counsel Attn: Kimberly A. Klock 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>

7. FINANCIAL FITNESS

a. **FINANCIAL SECURITY:** In accordance with 66 Pa.C.S. § 2809(c)(1)(i) and 52 Pa. Code § 54.40(a), 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.

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.

c. SUPPLIER FUNDING METHOD: If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.

Not applicable (operating exclusively as a Broker/Marketer).

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

The Company will collect monthly subscription fees directly from customers through Stripe or similar payment processor.

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.

Timothy Rivas, President / CEO
P.O. Box 111
Pocopson, PA 19366
Telephone: 610-731-4212
Email: tim@therateraven.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: See attached exhibit 8a

- Applicant's previous experience in the electricity industry.
- Summary and proof of licenses as a supplier of electric services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

b. **PROPOSED MARKETING METHOD** (*check all that apply*)

- Internal – Applicant will use its own internal resources/employees for marketing
- External EGS – Applicant will contract with a PUC **LICENSED EGS** broker/marketer
- Affiliate – Applicant will use a **NON-EGS** affiliate marketing company and or individuals.
- External Third-Party – Applicant will contract with a **NON-EGS** third party marketing company and or individuals
- Other (Describe):

c. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

- d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

Rate Raven Inc. will ensure all marketing is performed in an ethical manner through the following methods: All marketing materials, advertisements, emails, and customer communications are developed internally and reviewed and approved by the President/CEO and Chief Operating Officer prior to use. This review process verifies accuracy, truthfulness, and full compliance with Pennsylvania Public Utility Commission regulations (52 Pa. Code § 54.43), FTC guidelines, and consumer protection laws. Employees involved in marketing receive training on ethical practices and proper customer disclosures. The Company does not engage in door-to-door sales. If third-party marketing subcontractors are used in the future, they will be subject to contractual compliance obligations and ongoing oversight by senior management.

- 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.

See exhibit form attached

- 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(b)(4).
- 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 of the Public Utility Code, 66 Pa.C.S. Chapt. 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. § 2809(D) and 52 Pa. Code § 54.41(a). 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. §§ 4902, 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 thirty (30) 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 FirstEnergy PA - 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			
FirstEnergy PA - Met Ed		X	X		X		
FirstEnergy PA - Penelec	X	X			X	X	X
FirstEnergy PA - Penn Power	X			X			
FirstEnergy PA -West Penn		X		X		X	X
PECO			X				
Pike					X		
PPL		X	X		X	X	
UGI					X		
Wellsboro						X	
Entire Commonwealth	X	X	X	X	X	X	X

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

13. SIGNATURE



Applicant: _____

By: TIMOTHY RIVAS

Title: CEO

**APPENDIX A
APPLICATION AFFIDAVIT**

Commonwealth of Pennsylvania
County of Monroe : ss.

Timothy Rivas, Affiant, being duly sworn/affirmed according to law, deposes and says that:

He is the President / CEO of Rate Raven Inc.;

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

That the Applicant herein **Rate Raven Inc.** 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) and 52 Pa. Code § 54.37.

That the Applicant herein **Rate Raven Inc.** has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein **Rate Raven Inc.** acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

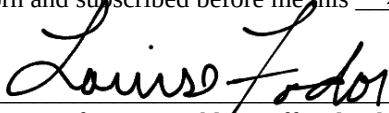
That the Applicant herein **Rate Raven Inc.** acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

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



Signature of Affiant

Sworn and subscribed before me this 25 day of March, 2026.



Signature of Notary Public / Official Administering Oath

My commission expires 03/10/2029.

[NOTARY SEAL]

Commonwealth of Pennsylvania LOUISE FODOR, Notary Public Monroe County My Commission Expires March 10, 2029 Commission Number 1457440
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**APPENDIX B
OPERATIONS AFFIDAVIT**

Commonwealth of Pennsylvania
County of Monroe : ss.
:

Timothy Rivas, Affiant, being duly sworn/affirmed according to law, deposes and says that:

He is the President / CEO of Rate Raven Inc.;

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

That **Rate Raven Inc.**, the Applicant herein, acknowledges that Rate Raven Inc. 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 **Rate Raven Inc.**, the Applicant herein, asserts that 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 **Rate Raven Inc.**, 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 Code of 1971, 72 P.S. §§ 7101 et seq., 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 **Rate Raven Inc.**, 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 to the best of his knowledge, information, and belief.



Signature of Affiant

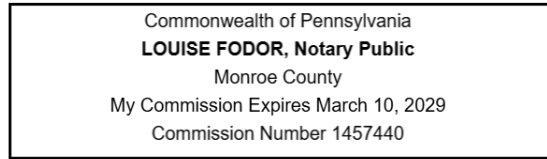
Sworn and subscribed before me this 25 day of March, 2026.

Louise Fodor

Signature of Notary Public / Official Administering Oath

My commission expires 03/10/2029.

[NOTARY SEAL]



Notarized Online with NotaryLive.com

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Rate Raven Inc. for approval to offer, render,
furnish, or supply electricity or electric generation services
as a Broker/Marketer to the public in the Commonwealth of Pennsylvania.

CERTIFICATE OF SERVICE

On this the 30th day of March, 2026, I certify that a true and correct copy of the foregoing Application of **Rate Raven Inc.** for an Electric Generation Supplier (Broker/Marketer) License in the Commonwealth of Pennsylvania, and all NON-CONFIDENTIAL attachments, have been served via electronic mail (PDF) upon the following:

1. Bureau of Investigation & Enforcement

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

2. Office of the Attorney General

Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

3. Office of Consumer Advocate

5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

4. Department of Revenue

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

5. Office of Small Business Advocate

Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

6. Citizens' Electric Company

Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

7. Duquesne Light Company

Regulatory Affairs

411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

8. FirstEnergy Pennsylvania Electric Company

Legal Department
341 White Pond Drive
Akron, OH 44320

9. PECO Energy Company

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

10. Pike County Light & Power Company

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

11. PPL Electric Utilities

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

12. UGI Utilities, Inc.

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

13. Wellsboro Electric Company

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

Respectfully submitted,



Timothy Rivas

President / CEO

Rate Raven Inc.

PO Box 111, Pocopson, PA 19366

tim@therateraven.com

Date: March 30, 2026

Exhibit 7B

b. FINANCIAL RECORDS, STATEMENTS, AND RATINGS Rate Raven Inc. is a newly incorporated Pennsylvania domestic corporation with no prior operating history. The Applicant is organized exclusively as a Broker/Marketer and will not take title to electricity nor make payments on behalf of customers. As a startup venture, the Applicant has no historical financial statements to provide at this time. The Applicant has established a dedicated business banking account for Rate Raven Inc. operations (account opening documentation available upon request). Startup costs are being funded directly by the principal officers, Timothy Rivas (President/CEO) and Andrew Harkness (COO). The Applicant submits that the \$10,000 surety bond filed herewith constitutes the primary financial assurance instrument consistent with the reduced bonding requirement applicable to Broker/Marketers under 66 Pa.C.S. § 2809(c) (1)(i). Given that Rate Raven Inc. will not take title to electricity, will not pay electricity bills on behalf of customers, and earns revenue solely through monthly subscription fees paid directly by customers, the Applicant's financial exposure to customers, suppliers, and the grid is minimal. The \$10,000 bond, combined with the Applicant's lean operating structure, demonstrates financial fitness commensurate with the Broker/Marketer services proposed.

Exhibit 8a – Technical Fitness and Business Plan Rate Raven Inc. Application for Electric Generation Supplier (EGS) License Date: March 2026

Company Overview Rate Raven Inc. is a technology-driven concierge service that helps residential and small commercial customers in deregulated electricity markets shop for lower rates, switch suppliers, and receive ongoing monitoring and usage alerts. The Company operates exclusively as a broker/marketer on a monthly subscription model and does not take title to electricity or earn commissions from suppliers.

Management Team and Experience Timothy Rivas – President and CEO Mr. Rivas brings extensive executive experience in business development, sales leadership, real estate portfolio management, and building technology-driven companies. As CEO, he oversees overall strategy, marketing, customer acquisition, and day-to-day execution.

Andrew Harkness – Chief Operating Officer Mr. Harkness serves as COO and brings significant experience in energy procurement strategies, sales team management, and regulatory compliance in deregulated energy markets. He is responsible for operational efficiency, process development, and technical implementation of the platform.

Technical Capabilities and Operations Rate Raven utilizes advanced AI tools to scan utility bills, compare real-time rates from official state sources (such as PA PowerSwitch), generate Letters of Authorization, facilitate customer switches, and provide continuous monthly monitoring and spike alerts. The Company maintains a lean, efficient operational structure supported by modern technology platforms.

Timothy Rivas holds a free membership with PJM Interconnection, providing direct access to wholesale market data and industry resources that strengthen the Company's rate intelligence and technical capabilities.

Marketing Approach Marketing will be conducted internally through digital channels, real estate professional networks, and targeted outreach. The Company will not engage in door-to-door sales.

Growth Strategy Rate Raven plans to launch in Pennsylvania and expand into additional deregulated states. The Company will focus on high customer retention through consistent savings and proactive alerts while maintaining full compliance with all PUC regulations.

Detailed operational procedures, staffing plans, and financial projections are available upon request by the Commission.

Exhibit 8e - Officer Experience and Resumes

Rate Raven Inc. Application for Electric Generation Supplier (EGS) License Date: March 2026

Timothy Rivas - President / CEO

- Current Role: President and CEO, Rate Raven Inc. (2026–present)
- Owner, Safe Shelter Environmental (2021–present) – Environmental services and compliance business focused on regulatory adherence and operational efficiency.
- Owner, CAWR Consulting (2024–present) – Business consulting firm providing strategic advisory, operational support, and business development services.
- Leadership and operational roles at Ciocca Automotive – Developed expertise in sales execution, customer acquisition, team leadership, and large-scale business operations.
- Responsible for overall strategy, marketing, customer acquisition, sales execution, and day-to-day operations at Rate Raven Inc.

Andrew Harkness - Chief Operating Officer

- Current Role: Chief Operating Officer, Rate Raven Inc. (2026–present)
- Previous Roles:

- o Director of Engineering, Evolution Sustainability Group (2022–present)
- o Project Manager, Evolution Energy Partners LLC (2019–2022)
- Experience: Significant background in energy procurement strategies, sales team management, and regulatory compliance in deregulated energy markets. Responsible for operational efficiency, process development, and technical platform implementation.

Note: Detailed resumes and references are available upon request by the Commission.



Department Of the Treasury
Internal Revenue Service
Philadelphia, PA 19255-0023
Important Information - Please Read

RATE RAVEN INC
1008 MARLIN DRIVE
WEST CHESTER, PA 19382

March 04, 2026

We assigned you an employer identification number (EIN)

Your EIN is **41-4648318**. The name control associated with this EIN is **RATE**.

What you need to do

- If you did **not** apply for this EIN, visit [IRS.gov/EINNotRequested](https://www.irs.gov/EINNotRequested).
- Use this EIN and your name exactly as they appear above when you fill out your tax returns. Otherwise, it may cause delays. Keep a copy of this notice for your records because we'll only send it to you once. You can share a copy with future officers of your organization or anyone asking for proof of your EIN. If your name or address is incorrect as shown, send the correct information to the address at the top of this notice.
- You must file the following forms by the dates shown.

Form	Due Date
1120	04/15/2027

What you need to know

If you need to pay certain types of taxes, like employment or corporate income taxes, we'll send you a package with instructions. The package will tell you how to pay your taxes online using the Electronic Federal Tax Payment System (EFTPS). We'll also send you a personal identification number (PIN) separately. Be sure to activate your PIN when you receive it, so you can start using the EFTPS. To learn more about EFTPS, refer to Publication 966, Electronic Choices to Pay All Your Federal Taxes.

If you qualify as a small business corporation and plan to file Form 1120-S, U.S. Income Tax Return for an S Corporation, you must first file Form 2553, Election by a Small Business Corporation, to elect to be treated as an S corporation. Refer to the instructions for the Form 2553 for more information.

Additional Information

- Refer to Publication 4557, Safeguarding Taxpayer Data: A Guide for Your Business, for tips on keeping your EIN safe.
- Find tax forms or publications by visiting [IRS.gov/Forms](https://www.irs.gov/Forms) or by calling 800-TAX-FORM (800-829-3676).
- Call us at 800-829-4933 if you can't find what you need online. If you prefer, you can write to the address at the top of this notice.



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

March 3, 2026

ZenBusiness Inc.
2040 LINGLESTOWN ROAD SUITE 109
HARRISBURG, PA 17110

Entity Name: Rate Raven Inc.
Entity File Date: March 3, 2026
Entity Number: 0015253222
Filing Type: Domestic Business Corporation

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.

As of 2025, annual reports are required for all domestic filing entities, limited liability general partnerships, and registered foreign associations. With the first year now complete, this requirement will continue on an annual basis. To ensure that you receive notice about future reporting deadlines and procedures, keep all information on file with the Bureau up-to-date, particularly the registered office address.



COMMONWEALTH OF PENNSYLVANIA
 Department of State
 Bureau of Corporations and Charitable Organizations
 PO Box 8722
 Harrisburg, Pennsylvania 17105-8722
ARTICLES OF INCORPORATION - FOR PROFIT
 Fee: \$125

Pennsylvania Department of State

-FILED-

File #: 0015253222
 Date Filed: 3/3/2026

DSCB:15-1306/2102/2303/2702/2903/3101/3303/7102 (rev. 1/2023)

In compliance with the requirements of (relating to corporations and unincorporated associations), the undersigned, desiring to incorporate a corporation for profit, hereby states that:

Business Filing Type

Filing type Domestic Business Corporation
 Business filing subtype Business

Corporation Name

Business name Rate Raven Inc.

Effective Date

The filing shall be effective when filed with the Department of State

Additional Information

The corporation is incorporated under the provisions of the Business Corporation Law of 1988.

Registered Office

The name of the commercial registered office provider and the county of venue is
 ZenBusiness Inc.
 Commercial Registered Office Provider
 Venue and Publication County DAUPHIN

Stock

The corporation is organized on a stock share basis and the aggregate number of shares authorized is:
 Number of shares authorized 10,000

Incorporators

Name of individual or organization	Address
Timothy Rivas	1008 MARLIN DR WEST CHESTER, PA 19382-2359

Additional provisions, if any

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

Electronic Signature

IN TESTIMONY WHEREOF, the incorporator(s) has/have signed these Articles of Incorporation.

Timothy Rivas

Timothy Rivas

03/03/2026

Date