



Compliance Department
Tel: 203-490-0017 • Fax: 203-905-6780
compliance@starionenergy.com

December 27, 2018

VIA UPS EXPRESS DELIVERY

Brinda Westbrook-Sedgwick
Commission Secretary
D.C. Public Service Commission
1325 G Street NW, Suite 800
Washington, DC 20005

RECEIVED
DISTRICT OF COLUMBIA
PUBLIC SERVICE COMMISSION
2018 DEC 31 PM 3:21
OFFICE OF THE
COMMISSION SECRETARY

RE: EA-11-32 – Five-Year Renewal Application of Starion Energy PA, Inc.

Dear Ms. Westbrook-Sedgwick:

On January 19, 2012, the Commission granted a license to Starion Energy PA, Inc. ("Starion") to function as an electricity supplier in the District of Columbia. Pursuant to the Commission's September 19, 2018 Order in RM46-2015-01-E, Starion hereby submits the enclosed renewal application for review.

Please be advised that portions of the enclosed renewal application have been marked confidential, as they contain commercially-sensitive financial information. Starion respectfully requests confidential treatment for each page submitted with this renewal application, where such page has been marked or otherwise designated 'Confidential'.

Enclosed please find a signed and verified original renewal application, as well as an electronic copy with the confidential information redacted.

Finally, on November 15, 2018, Starion provided notice to the Commission of the Company's voluntary petition for relief under chapter 11 of title 11 of the United States Code, U.S.C. §§ 101-1532. A copy of this notice is included as Exhibit G to the enclosed renewal application. Due to the pendency of this proceeding, Starion has submitted its "Affidavit of General Compliance for Electricity Suppliers" with appropriate modifications.

Starion looks forward to its continued growth as an electricity supplier in the District. Please do not hesitate to contact the undersigned with any questions or concerns.

Respectfully submitted,

Robert Bassett
Director, Compliance & Regulatory Affairs
(203) 803-2732
rbassett@starionenergy.com

Enclosure

BEFORE THE DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION

Renewal Application for License No. (Order No.) EA-11-32

Renewal Application of Starion Energy PA, Inc., d/b/a ("doing business as")

for approval to offer, render, furnish, or supply electricity or electric generation services and/or natural gas services as a(n) **marketer of electricity**,
[specified in item 8 below] to the public in the District of Columbia

To the District of Columbia Public Service Commission:

BUSINESS INFORMATION

1. IDENTITY OF THE LICENSEE/RENEWAL APPLICANT:

a. Legal Name Starion Energy PA, Inc.

Current Mailing Address: P.O. Box 845, Middlebury, CT 06762

Street Address (if different): 751 Straits Turnpike, Ste. 2000, Middlebury, CT 06762

Telephone Number: 800-600-3040

Website URL: www.starionenergy.com

Other States, including District of Columbia, in which the Renewal Applicant is now or has been engaged in the retail sale of electricity and/or natural gas and the names under which the Renewal Applicant is engaged or has been engaged in such business(es). Renewal Applicant may limit response to the last three (3) years:

Name: Please see Exhibit A.

Business Address: _____

License # State of Issuance: _____

Other states in which the Renewal Applicant has applied to provide retail electricity and/or

natural gas service but has been rejected. Renewal Applicant may limit response to the last three (3) years:

State(s): Not applicable.

Date of Renewal Application: _____

Attach additional sheets to the application if necessary.

b. Trade name (If applicable): _____

c. The District of Columbia and other states, in which the Renewal Applicant has provided retail electricity and/or natural gas service under the current Renewal Applicant name or in a different name but has voluntarily or involuntarily surrendered its license. Describe reasons for license surrender. With regard to a voluntary or involuntary license surrender in the District of Columbia only, state whether any previously outstanding assessments and/or penalties imposed by the Commission and the Office of the People's Counsel have been paid. If any previous assessments and/or penalties are unpaid, provide a date certain when those assessments and/or penalties will be paid. Renewal Applicant may limit response to the preceding five (5) years:

State(s): Not applicable.

Date of License Surrender and Reasons for License Surrender (If applicable):

In the District of Columbia, Amount of Paid Assessments and Unpaid Assessments/Penalties Following License Surrender and to Whom Owed (If Applicable)

Attach additional sheets to the application if necessary.

2.a. CONTACT PERSON-REGULATORY CONTACT:

Name and Title: Robert Bassett - Director, Compliance & Regulatory Affairs

Address: P.O. Box 845, Middlebury, CT 06762

Telephone: (203) 803-2732

Fax: (203) 905-6780

E-mail: rbassett@starionenergy.com

b. CONTACT PERSON-CUSTOMER SERVICE and CONSUMER COMPLAINTS (not required for Aggregators who do not take title and/or Brokers):

Name and Title: Kristin Corbett - Compliance Manager

Address: P.O. Box 845, Middlebury, CT 06762

Telephone: (203) 490-0017

Fax: (203) 905-6780

E-mail: compliance@starionenergy.com

3. RESIDENT AGENT:

Name and Title: Incorp Services, Inc. - Registered Agent

Address: 1090 Vermont Ave N.W., Suite 910, Washington, DC 20005

Telephone: 800-246-2677

Fax: 702-866-2689

E-mail: processing@incorp.com

4. PRIMARY COMPANY OFFICIALS

President/General Partners:

Name(s) Ruzhdi Dauti

Business Address: P.O. Box 845, Middlebury, CT 06762

CEO/Managing Partner:

Name(s) Ruzhdi Dauti

Business Address: P.O. Box 845, Middlebury, CT 06762

Secretary Name: Ruzhdi Dauti

Business Address: P.O. Box 845, Middlebury, CT 06762

Treasurer Name: Ruzhdi Dauti

Business Address: P.O. Box 845, Middlebury, CT 06762

a. LICENSEE/RENEWAL APPLICANT'S BUSINESS FORM:

- | | |
|-------------------------------------|-------------------------------|
| <input type="checkbox"/> | Proprietorship |
| <input checked="" type="checkbox"/> | Corporation |
| <input type="checkbox"/> | Partnership |
| <input type="checkbox"/> | Limited Partnership |
| <input type="checkbox"/> | Limited Liability Company |
| <input type="checkbox"/> | Limited Liability Partnership |
| <input type="checkbox"/> | Other _____ |

- b. **OWNERSHIP:** Provide on a separate sheet the names and addresses of all persons and entities that directly or indirectly own ten percent (10%) or more of the ownership interests in the Renewal Applicant, or have the right to vote ten percent (10%) or more in the Renewal Applicant's voting securities, or who otherwise have the power to control ten percent (10%) or more of the Renewal Applicant. **Please see Exhibit B.**

5. **AFFILIATES, OR PREDECESSOR(S) OF THE RENEWAL APPLICANT, ENGAGED IN THE SALE OR TRANSMISSION OF ELECTRICITY AT WHOLESALE OR RETAIL OR TRANSPORTATION/DELIVERY OF NATURAL GAS AT WHOLESALE OR RETAIL TO THE PUBLIC:** (select and complete appropriate statement) (Renewal Applicant may limit responses to the last five (5) years)

a. The Renewal Applicant has no such Affiliate(s) or Predecessors(s)._____

b. Renewal Applicant is an Affiliate of a regulated utility. Please provide the regulated utility's Name and the jurisdictions in which it operates:_____

c. Affiliate(s), or Predecessor(s), other than a regulated utility that provides, or provided, sale or transmission of electricity at wholesale or retail, or sale or transportation/delivery of natural gas at wholesale or retail to the public:

Name: **Please see Exhibit A.**_____

Business Address:_____

License #, State of Issuance:_____

Location of Operations (Utility Service Territory):_____

Attach additional sheets to the application if necessary.

- 6. ACTIONS AGAINST LICENSEES/RENEWAL APPLICANT:** Provide the following information for the Renewal Applicant, any Predecessor(s), and any unregulated Affiliate that engages in or engaged in the sale or transmission of electricity at wholesale or retail, or the sale or transportation/delivery of natural gas at wholesale or retail to the public. (Renewal Applicant may limit responses to the preceding five (5) years).

- ☐ Identify all actions against the Licensee, Predecessor or any regulated or unregulated affiliate(s) such as Suspensions/Revocations/Limitations/Reprimands/Fines and describe the action in an attached statement, including docket numbers, offense dates, and case numbers, if applicable. Formal Investigations (defined as those investigations formally instituted in a public forum by way of the filing of a complaint, show cause order, or similar pleading) instituted by any regulatory agency or law enforcement agency relating to the Renewal Applicant, Predecessor(s), or unregulated affiliate(s) if, as a result of the investigation, Renewal Applicant's/Predecessor's/or affiliate's license to provide service to the public was in jeopardy are also listed. The license number, state of issuance, and name of license are identified below:

State(s): Please see Exhibit C.

Name(s): _____

License Number(s) (or other applicable identification): _____

- ☐ No such action has been taken.

- 7. RELIABILITY AND ENVIRONMENTAL OFFICIAL ACTIONS AGAINST APPLICANTS/AFFILIATES:** Provide the following information for official actions that have been taken against the Renewal Applicant, any Predecessor(s), and any unregulated Affiliate (if available to the Renewal Applicant) that engages in the retail or wholesale sale of electricity and/or natural gas for matters relating to environmental or reliability status for the past five years.

- ☐ Official actions such as Suspensions/Revocations/Limitations/Reprimands/Fines/Regulatory Investigations (state agencies, FERC, EPA, or other federal agencies) have been taken against the Renewal Applicant, any Predecessor(s) or unregulated affiliate(s), and are described in the attached statement, including docket numbers, offense dates, and case numbers, if applicable.

State(s): _____

Name(s): _____

☒ No such action has been taken.

8. RENEWAL APPLICANT'S PROPOSED OR CURRENT OPERATIONS:

The Renewal Applicant operates or proposes to operate as a:

☐ Generator of Electricity

☒ Marketer of Electricity or Natural Gas Supplier/Marketer of natural gas.

☐ Aggregator acting on behalf of Customers to purchase electricity or natural gas and does not take title to natural gas.

☐ Broker acting as an agent or intermediary on behalf of Customers in the sale and purchase of electricity or natural gas and who does not take title to natural gas.

Which electricity or natural gas supply related service(s) does the Renewal Applicant offer?

☐ Billing

☐ Other (Please specify the nature of such other services in an attached statement.)

Does Renewal Applicant intend to or does offer competitive billing services? No.

Is the Renewal Applicant proposing to offer any other services? No.

If so, please provide information regarding the proposed service in an attached statement.

9. CUSTOMERS: Renewal Applicant provides services to, or proposes to provide services to (check all that apply):

☒ Residential Customers

☒ Commercial Customers

☒ Industrial Customers

☐ Other (Describe in attachment)

Does the Renewal Applicant have any restrictions on the number or size of end use Customers? Yes ____ or No **X** ____ If yes, please explain the information in an attached statement.

START DATE: The Renewal Applicant began services or propose to begin services:

Renewal Applicant is currently providing services under its existing license.

FINANCIAL INTEGRITY

10. REQUIRED DOCUMENTATION OF FINANCIAL INTEGRITY:

The Renewal Applicant shall provide the most recent versions of the following documents to the extent they are available:

- Balance sheets, income statements and statements of cash flow for the most recent 12-month period for which information is available. Audited financial statements must be provided if they exist. In addition, the Renewal Applicant shall provide any financial statements subsequent to the most recent annual financial statements.
- In the event that a parent or other company, person or entity has undertaken to guarantee the financial integrity of the Renewal Applicant, the Renewal Applicant must submit such entity's balance sheet, income statement and statement of cash flow, together with documentation of such guarantee to insure the financial integrity of the Renewal Applicant. Audited financial statements must be provided if they exist. In addition, the Renewal Applicant shall provide any available quarterly financial statements subsequent to the most recent annual financial statements.

Please see Exhibit D (CONFIDENTIAL).

- Organizational structure of Renewal Applicant. Include Renewal Applicant's parent, affiliate(s), and subsidiary(ies) if any.
Please see Exhibit E.
- Evidence of general liability insurance.
Please see Exhibit F.

11. BONDING REQUIREMENTS

Does the Licensee have a current bond or any other form of financial guarantee (i.e., line-of-credit agreement, irrevocable letters of credit, etc.) on file with the Commission? Check all that apply. Licensee is not required to submit a new bond if current bond is on file with the Commission.

Customer Payments Bond

Integrity Bond -Surety Bond for Energy Suppliers and Marketers

Integrity Bond -Surety Bond for Aggregators and Brokers

Other Form of Financial Guarantee (please identify)

Integrity Bond

A Renewal Applicant who cannot provide credible evidence that it meets the financial integrity standards listed in Sections 4605 or 4705 of Chapters 46 and 47 of Title 15 DCMR must submit a bond, if a bond is not currently on file, on the form attached to this Renewal Application ("Integrity Bond"). The Renewal Applicant, if licensed by the Commission as an electricity and/or natural gas supplier, may be required to update/revise this initial Integrity Bond, by revising the initial Integrity Bond or posting an additional Integrity Bond, as set forth in Sections 4605 and 4705.

However, a Renewal Applicant who can provide credible evidence that it meets the financial integrity standards listed in Section 4605 or 4705 will not be required to submit an Integrity Bond. (The Renewal Applicant may still be required to submit a separate Customer Payments Bond, as discussed below.)

Customer Payments Bond

A separate bond on the appropriate form attached to this Renewal Application is mandatory if a Renewal Applicant requires prepayments and/or deposits from residential or small commercial Customers ("Customer Payments Bond"). Please check one of the boxes below to state whether you, the Renewal Applicant, intend to charge, collect, or hold prepayments and/or deposits, as such terms are defined in the Bonding Requirements Addendum attached to this Renewal Application:

- ☒ Renewal Applicant will not accept prepayments or deposits from residential and/or small commercial Customers.

- ☐ Renewal Applicant intends to accept prepayments or deposits and/or deposits from residential and/or small commercial Customers. Renewal Applicant must comply with Bonding Requirements Addendum governing the Customer Payment Bond.

Further details regarding the District of Columbia's bonding requirements are included in Sections 4604, 4704, 4605 and 4705 of Chapters 46 and 47 of Title 15 DCMR.

12. **NOTICE OF REQUIRED COMPLIANCE:** The Renewal Applicant is hereby notified that it is required to comply with the following:
- (a) The Renewal Applicant may be required to submit bond(s), as described herein.
 - (b) The Renewal Applicant must update this application with the Commission immediately if any of the information provided in this Renewal Application changes or an error or inaccuracy is noted during the pendency of the Renewal Application. Following submission of a completed Renewal Application, the Renewal Applicant/Licensee must inform the Commission of changes to all parts of the application and the averment regarding any civil, criminal, or regulatory penalties, etc. imposed on Licensee, *et al.* within thirty days of the change or an error or inaccuracy is noted. A Licensee must inform the Commission of changes to the averment regarding bankruptcy proceedings instituted voluntarily or involuntarily within one business day of the institution of such proceedings.
 - (c) Supplement this Renewal Application in the event the Commission modifies the licensing requirements or requests further information.
 - (d) Agree that it will not present itself as a licensed retail supplier of electricity and/or natural gas in the District of Columbia, sell or market services, accept deposits, prepayments, or contract with any end-use Customers without a license from the Commission.
 - (e) Pay all fees imposed by the Commission and any applicable taxes.
 - (f) Participate in and complete an annual Electricity and/or Natural Gas Suppliers Education Workshop sponsored by the Commission, pursuant to Sections 4603 and 4703 of Chapters 46 and 47, Title 15 DCMR.

13. **AFFIDAVITS REQUIRED.** The Renewal Applicant must supply updated Affidavits of Tax Compliance and General Compliance to the Commission with the completed Renewal Application. The updated affidavits are included with this Renewal Application packet and must be executed by the Renewal Applicant or representative with authority to bind the Renewal Applicant in compliance with District of Columbia laws.
14. **FURTHER DEVELOPMENTS:** The Renewal Applicant is under a continuing obligation to amend its application if substantial changes occur in the information upon which the Commission relied in approving the original filing.

AFFIDAVIT OF TAX COMPLIANCE

State of Connecticut

:

County of New Haven

: ss

:

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

That he/she is the President (office of Affiant) of Starion Energy PA, Inc. (Name of Renewal Applicant);

That he/she is authorized to and does make this Affidavit for said Renewal Applicant:

That Starion Energy PA, Inc. the Renewal Applicant herein, certifies to the Public Service Commission of the District of Columbia ("Commission") that it is subject to, will pay, and in the past has paid, the full amount of District of Columbia and Federal taxes imposed by applicable statutes and ordinances, as may be amended from time to time. The Renewal Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of the District of Columbia, shall be cause for the Commission to revoke the license of the Renewal Applicant. The Renewal Applicant acknowledges that it shall provide to the Commission its jurisdictional Gross Receipts and revenues from retail sales in the District, for the previous year or as otherwise required by the Commission.

As provided by applicable Law, Renewal Applicant, by filing of this Renewal Application waives confidentiality with respect to its tax information in the possession of the (appropriate taxing authority), regardless of the source of the information, and shall consent to the (appropriate taxing authority) providing that information to the Commission. The Commission shall retain such information confidentially. This does not constitute a waiver of the confidentiality of such information with respect to any party other than the Commission.

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

Signature of Affiant

Sworn and subscribed before me this 21 day of December, 2018.

Signature of official administering oath

My commission expires _____.

IVETTE ARCE
NOTARY PUBLIC
State of Connecticut
My Commission Expires
May 31, 2020

**AFFIDAVIT OF GENERAL COMPLIANCE
FOR ELECTRICITY SUPPLIERS**

State of Connecticut :
County of New Haven : SS

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

He/she is the President (Officer/Affiant) of Starion Energy PA, Inc. (Name of Renewal Applicant).

That he/she is authorized to and does make this Affidavit for said Renewal Applicant.

That the Renewal Applicant herein certifies to the Public Service Commission of the District of Columbia ("Commission") that:

The Renewal Applicant agrees to comply with the terms and conditions of Potomac Electric Power's Company's tariff and agreements.

The Renewal Applicant is in compliance with and agrees to comply with all applicable Federal and District of Columbia consumer protection and environmental laws and regulations, and Commissions regulations, fees, assessments, order and requirements.

The Renewal Applicant agrees that it shall neither disclose nor resell individual residential Customer data provided to the Renewal Applicant by the Potomac Electric Power Company. Disclosure or resale of individual non-residential Customer data provided to the Renewal Applicant by a District of Columbia electricity company will be governed by Customer contract.

The Renewal Applicant agrees to post an appropriate bond or other form of financial guarantee as required by the Commission and its regulations.

The Renewal Applicant, including any of its Predecessor(s) and/or affiliates that engages in or engaged in the sale or transmission of electricity at wholesale or retail, or in the sale electricity at wholesale or retail to the public, the general partners, company officials, corporate officers or directors, or limited liability company managers or officers of the Renewal Applicant, its predecessor(s) or its affiliates, agrees that it:

1. Has had no civil, criminal or regulatory sanctions or Penalties imposed against it within the previous five (5) years pursuant to any state or federal consumer protection law or regulations, has not been convicted of any

fraud-related crime (including, but not limited to, counterfeiting and forgery, embezzlement and theft, fraud and false statements, perjury, and securities fraud) within the last five (5) years; and has not ever been convicted of a felony; or alternatively.


- 2 Has disclosed by attachment all such sanctions, penalties or convictions.

The Renewal Applicant further certifies that it:

1. Is not under involuntary bankruptcy/insolvency proceedings including but not limited to, the appointment of a receiver, liquidator, or trustee of the supplier, or a decree by such court adjudging the supplier bankrupt or insolvent or sequestering any substantial part of its property or a petition to declare bankruptcy as to reorganize the supplier; and
2. ~~Has not filed a voluntary petition in bankruptcy under any provision of any Federal or state bankruptcy law, or its consent to the filing of any bankruptcy or reorganization petition against it under any similar law; or without limiting the generality of the foregoing, a supplier admits in writing its inability to pay its debt generally as they become due to consents to the appointment of a receiver, trustee or liquidator of it or of all or any part of its property.~~ RD

That Renewal Applicant possesses the requisite managerial and financial fitness to provide service at retail in the District of Columbia.

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


Signature of Affiant

Sworn and subscribed before me this 21 day of December, 2018.


Signature of official administering oath

IVETTE ARCE
NOTARY PUBLIC
State of Connecticut
My Commission Expires
May 31, 2020

My commission expires _____.

VERIFICATION

State of Connecticut :
County of New Haven : ss
:

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

He/she is the President (Officer/Affiant) of
Starion Energy PA, Inc. (Name of Renewal
Applicant);

That he/she is authorized to and does make this Affidavit for said corporation;

The Renewal Applicant understands that the making of a false statement(s) herein may be grounds for denying the Renewal Application or, if later discovered, for revoking any authority granted pursuant to the Renewal Application. This Renewal Application is subject to all applicable Sections of the District of Columbia Code as may be amended from time to time relating to perjury and falsification in official matters.

That the Renewal Applicant will supplement this Renewal Application in the event the Public Service Commission of the District of Columbia ("Commission") modifies the licensing requirements, or requests further information.

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



Signature of Affiant

Sworn and subscribed before me this 21 day of December, 2018.



Signature of official administering oath

IVETTE ARCE
NOTARY PUBLIC
State of Connecticut
My Commission Expires
May 31, 2020

My commission expires _____.

**RENEWAL APPLICANT'S GENERAL AUTHORIZATION FOR VERIFICATION OF
FINANCIAL INFORMATION, ETC.**

TO WHOM IT MAY CONCERN:

I/We having applied and been granted a license(s) to be an Electricity and/or Natural Gas Supplier, or to provide certain Electricity and/or Natural Gas Supply related services by the Public Service Commission of the District of Columbia (the "Commission") duly authorize you to release to the Staff of the Commission and its authorized representatives and agents any information or copies of records requested concerning:

MY COMPANY OR BUSINESS AND ITS HISTORY,
PERFORMANCE, OPERATIONS, CUSTOMER
RELATIONS, FINANCIAL CONDITION, INCLUDING
BANK ACCOUNT TRANSACTIONS AND BALANCES,
PAYMENT HISTORY WITH SUPPLIERS AND OTHER
CREDITORS, VERIFICATION OF NET WORTH AND
OTHER INFORMATION AND RECORDS WHICH THE
COMMISSION REQUIRES TO VERIFY OR MAKE
INQUIRY CONCERNING MY/OUR FINANCIAL
INTEGRITY AND THE INFORMATION CONTAINED
IN MY/OUR LICENSE APPLICATION OR OTHER
INFORMATION PROVIDED BY ME/US TO THE
COMMISSION OR, STAFF OF THE COMMISSION OR
ITS REPRESENTATIVES OR AGENTS.

This Authorization is continuing in nature and includes release of information following issuance and renewal of a license, for reverification, quality assurance, internal review, etc. The information is for the confidential use of the Commission and the Staff of the Commission in determining my/our financial integrity for being a licensee or to confirm information I/We have supplied and may not be released by order of the Commission or by order of a court of competent jurisdiction.

A photographic or fax copy of this authorization may be deemed to be the equivalent of the original and may be used as a duplicate original. The original signed form is maintained by the Staff of the Commission.

RENEWAL APPLICANT'S AUTHORIZATION TO RELEASE INFORMATION:

Ruzhdi Danti
RENEWAL APPLICANT (please print)

on behalf of
Starion Energy PA, Inc.

[Signature]
RENEWAL APPLICANT'S SIGNATURE

12/21/2018
DATE

President
TITLE

Starion Energy PA, Inc.
Renewal Application for License No. EA-11-32
December 21, 2018

Exhibit A
Applicant/Affiliates Licenses & Operations

Starion Energy PA, Inc. (Applicant)
P.O. Box 845, Middlebury, CT 06762

State	License No.	Commodity	Utility Territories
Ohio	11-381E	Electric	Duke; AEP*; FirstEnergy*; DP&L *
Pennsylvania	A-2010-2210819	Electric	PPL; PECO; Duq; Penelec; Met-Ed; PennPower
District of Columbia	EA-11-32	Electric	Pepco
Illinois	12-0058 & 16-0544	Electric	ComEd; Ameren*
New Jersey	ESL-0119	Electric	PSE&G; ACE; JCP&L
Delaware	12-418	Electric	Delmarva
Maryland	IR-2094	Electric	BGE; Pepco; Delmarva; SMECO

Starion Energy, Inc. (Parent)
P.O. Box 845, Middlebury, CT 06762

State	License No.	Commodity	Utility Territories
Connecticut	09-10-10	Electric	Eversource; UI
Massachusetts	CS-104	Electric	National Grid; Eversource
Rhode Island	D-96-6-E9	Electric	N/A*

Starion Energy NY, Inc. (Affiliate)
P.O. Box 845, Middlebury, CT 06762

State	License No.	Commodity	Utility Territories
New York	ESCO Code: STAR	Electric/Gas	ConEd; National Grid; Central Hudson; O&R
Indiana	N/A	Gas	NIPSCO*
Michigan	U-18366	Gas	N/A*
Ohio	14-339G	Gas	Duke

Starion Energy PA, Inc.
Renewal Application for License No. EA-11-32
December 21, 2018

Exhibit B
Ownership

Starion Energy PA, Inc. (Applicant) is a 100% wholly-owned subsidiary of Starion Energy, Inc., a Delaware corporation.

Starion Energy PA, Inc.
Renewal Application for License No. EA-11-32
December 21, 2018

Exhibit C
Actions Against Licensees/Renewal Applicant

Jurisdiction	Entity	Docket	Status	Description
Delaware	Starion Energy PA, Inc.	395-13	Closed	On 11/5/2013, the Delaware Public Service Commission opened a docket to investigate the Company's solicitation of potential Delaware customers. The docket remained dormant for nearly two years, until December 15, 2015, when the PSC issued an Order closing the docket due to insufficient evidence to pursue an investigation
District of Columbia	Starion Energy PA, Inc.	FC1105	Closed	On 5/30/2013, the District of Columbia Public Service Commission opened a docket to investigate the Company's business and solicitation practices. No findings were made. A settlement between the Company and the Office of People's Counsel was approved by the PSC on February 6, 2014. On April 5, 2018, the PSC issued an Order finding that the Company has satisfied all compliance directives issued by the Commission and closing the docket without further action.
Maryland	Starion Energy PA, Inc.	9324	Open	On 5/13/2013, the Maryland Public Service Commission issued an order to the Company to show cause why it should not find that Starion violated any statute, regulation, or Order in its customer marketing, advertising and trade practices. An evidentiary hearing was held in October 2013. The PSC issued Order No. 86211 on May 7, 2014. The Order included a requirement that Starion submit compliance reports every six (6) months until further notice and issued penalties. A hearing to review Starion's compliance first compliance filing was held in January and February 2015. The ALJ assigned to the Case issued a Report finding that Starion had demonstrated compliance with the Commission's Order.
Connecticut	Starion Energy, Inc. (Parent Company)	13-07-16	Closed	On 7/12/2013, the Connecticut Public Utilities Regulatory Authority established a docket to investigate the trade practices of Starion Energy, Inc. On June 3, 2016, the PURA issued a Notice that, after extensive technical and legal staff review of the record in the proceeding, the docket would be closed without further review or action.
Massachusetts	Starion Energy, Inc. (Parent Company); Starion Energy PA, Inc. (Applicant); Starion Energy NY, Inc. (Affiliate)	1884CV03199	Open	Although not responsive to the request for information as presented, and as previously reported, on October 15, 2018, the Massachusetts Attorney General's Office filed suit against Starion in the Suffolk County Superior Court, asserting various unsubstantiated claims. No findings have been made.