

[The Form for ABC Applicants has been prepared by the Staff of the Illinois Commerce Commission. It is intended to be a source of information and a template that may be of use to entities petitioning the Illinois Commerce Commission to be licensed as an Agent, Broker, and Consultant ("ABC") under Section 16-115C of the Public Utilities Act ("Act") [220 ILCS 5/16-115C] and 83 Ill. Adm. Code 454 ("Part 454"), Licensure of Agents, Brokers, and Consultants. The Form is presented in a generic format and should be individually tailored by each ABC applicant before submitting to the Illinois Commerce Commission. The Form is not intended to constitute legal advice regarding compliance with Section 16-115C of the Act, 83 Ill. Adm. Code 454, or any applicable case law.]

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Great Lakes Energy LLC

Application for Licensure of
Agents, Brokers, and Consultants
under Section 16-115C
of the Public Utilities Act.

Docket No.

10-0866

ILLINOIS
COMMERCE COMMISSION
2010 FEB - 1 A 11: 21
CHIEF CLERK'S OFFICE

APPLICATION

Great Lakes Energy LLC ("Applicant"), hereby requests that the Illinois Commerce Commission ("Commission") grant it a license pursuant to Section 16-115C of the Public Utilities Act ("Act"). In support of its application, Applicant states as follows:

GENERAL [454.40, 454.50, 454.100]

1. **Great Lakes Energy LLC**
200 Crescent Court, Suite 1065
Dallas, Texas 75201
2. Related Information:
 - Type of business entity: Limited Liability Company ("LLC")
 - Jurisdiction in which and under whose laws business entity was created: Delaware
 - Other names under which Applicant does business (D/B/A): n/a

3. Contact Persons for the following:
- a) issues related to processing this application and
 - b) issues related to complaint resolution [454.130]

Justin C. Helms or Jeremiah Collins

Provide each contact person's name, title, mailing address, telephone number, and e-mail address for a) and b).

Justin C. Helms
Managing Partner
200 Crescent Court, Suite 1065
Dallas, Texas 75201
Tel: 469-533-7400
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Jeremiah Collins
Managing Partner
200 Crescent Court, Suite 1065
Dallas, Texas 75201
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jcollins@glenwoodep.com

4. Description of Applicant's business. [454.40(c)(1)]

Great Lakes Energy LLC is a national energy procurement and management firm helping companies implement strategies to control and reduce energy costs. Great Lakes Energy LLC is comprised of energy professionals from leading energy companies across the country. Through our strong wholesale trading network and operations, we are able to leverage our purchasing power across trading regions nationwide to obtain the most aggressive pricing in the marketplace creating maximum savings for our clients.

Electricity deregulation has created new opportunities to achieve energy savings as well as creating new challenges for managing and controlling energy costs. Identifying, managing, and maintaining energy expenditures for your facilities can be both challenging and time consuming. Great Lakes Energy LLC can help make this process seamless and stress free. Our procurement strategies are tailored specifically to the individual clients' needs including the development of customized pricing alternatives as well as bill review and account management. We are continuously searching for opportunities to help our clients more effectively manage energy risk. Whether you have one facility, or hundreds of facilities nationwide, Great Lakes Energy LLC is there to manage your energy procurement needs.

5. Great Lakes Energy LLC meets the requirements of Section 16-115C of the Act. The attached exhibits detail Great Lakes Energy LLC's principals experience as well as its qualifications to conduct business within Illinois and elsewhere.
6. The name, address, telephone number, any facsimile number and any e-mail address of the agent registered with the Illinois Secretary of State. This information shall be kept current and any change regarding the licensee shall be reported within 15 days after the change occurs. The required information shall be filed with the Chief Clerk of the Commission at its Springfield office. [454.40(c)(3)]

Capital Corporate Services, Inc.
118 W Edwards Street, Suite 200
Springfield, IL 62704
1-800-432-3622

7. Applicant certifies that it:
 - a) is licensed to do business in the State of Illinois and is in compliance with all other applicable laws, regulations and Commission rules and orders; [454.40(c)(2)]

Registered with the State of Illinois on June 4, 2009. – **Please see Exhibit 7a.**
 - b) shall comply with all terms and conditions required by Section 16-115C of the Act; [454.40(d)(2)]
 - c) shall ensure any person who acts on behalf of the entity will comply with all sections of Part 454 applicable to the function or functions to be performed; [454.40(d)(3)]
 - d) shall remain in compliance with the provisions of the Act and Part 454; [454.50]
 - e) shall ensure that authorizations received from customers, and all other applicable records are retained for a period of not less than three calendar years after the calendar year in which they were created; and [454.100(a)]
 - f) shall preserve the confidentiality of its customers' data. [454.100(b)]

MANAGERIAL LICENSING QUALIFICATIONS [Section 454.60]

8. Applicant meets the managerial qualifications set forth in Part 454.60, as demonstrated in Attachment __. Attachment __ includes an exhibit containing a corporate organizational chart and identifying the persons who are being used to meet the requirements of Part 454.60(a). Attachment _ includes an exhibit

containing occupational background information on the person or persons who are being used to meet the requirements of Part 454.60(a). [Attachment should include narrative and/or resume of key personnel showing clearly how the managerial experience requirement is being met.]

Please see Exhibit 8.

TECHNICAL LICENSING QUALIFICATIONS [Section 454.70]

9. Applicant meets the technical qualifications set forth in Part 454.70, as demonstrated in Attachment __. Attachment __ includes an exhibit containing occupational background information on the person or persons who are being used to meet the requirements of Part 454.70(a). [The attachment shall identify the persons who are being used to meet each of the requirements of Part 454.70. Attachment should include narrative and/or resumes of key personnel showing clearly how the technical experience requirement is being met.]

Please see Exhibit 9.

FINANCIAL LICENSING REQUIREMENTS [SECTION 454.80]

10. Applicant is required to execute and maintain a license or permit bond in the name of the People of the State of Illinois issued by a qualifying surety or insurance company authorized to transact business in the State of Illinois. The amount of the bond shall equal \$5,000. [Attach the license or permit bond required by Part 454.80(a) and proof that the surety meets the definition of "qualifying surety" as set forth in Part 454.10.]

[Department of the Treasury's Listing of Approved Sureties (Department Circular 570) (<http://www.fms.treas.gov/c570/c570.html>)]

CODE OF CONDUCT [SECTION 454.90]

11. Applicant certifies that it shall:
 - a) Disclose in plain language in writing the nature of the services offered by the ABC;
 - b) Disclose in plain language in writing to all persons it solicits the total anticipated remuneration to be paid to it by any third party over the period of the proposed underlying customer contract. Any such disclosure must be made prior to entering into the contract and signed by the customer;
 - c) Not hold itself out as independent or unaffiliated with any RES, or both, or use words calculated to give that impression, unless the person or entity offering service under this Section 16-115C of the Act has no contractual

relationship with any RES or its affiliates regarding retail electric service in Illinois;

- d) Not utilize false, misleading, materially inaccurate, defamatory, or otherwise deceptive language or materials in the soliciting or providing of its services;
- e) Maintain copies of all marketing materials disseminated to third parties for a period of not less than three years;
- f) Maintain copies of all disclosure statements required in subsections (a) and (b) for a period of not less than three years;
- g) Not present electricity pricing information in a manner that favors one supplier over another, unless a valid pricing comparison is made utilizing all relevant costs and terms; and
- h) Comply with the requirements of Sections 2EE, 2FF, 2GG, and 2HH of the Consumer Fraud and Deceptive Business Practices Act [815 ILCS 505/2EE, 2FF, 2GG, and 2HH].

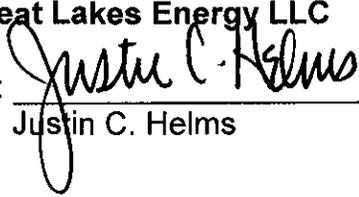
REPORTING REQUIREMENTS [SECTION 454.110]

- 12. Applicant agrees to submit reports in accordance with annual reporting requirements. [454.110]

WHEREFORE, Applicant requests that the Commission grant its application for licensure as an agent, broker, or consultant to engage in the procurement or sale of retail electricity supply for third parties.

Respectfully submitted,

Great Lakes Energy LLC

By: 

Justin C. Helms

Jonathan L. Phillips, Esq.
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Houston, TX 77027
(713) 599-4923
(832) 634-4640
jphillips@jphillipspc.com

VERIFICATION

STATE OF TEXAS)
) ss.
COUNTY OF DALLAS)

Justin C. Helms, being first duly sworn, deposes and says that he is an authorized officer of Great Lakes Energy LLC; that he has read the foregoing Application of Great Lakes Energy LLC and all of the attachments accompanying and referred to within the Application; and that the statements contained in the Application and the attachments are true, correct and complete to the best of his knowledge, information and belief.

Justin C Helms
Justin C. Helms

Subscribed and sworn to before me
this 29th day of January 2010.

Jessica Pyles
Notary Public
[Stamp of Notary]

