

Wrightwood Energy Services Ltd :  
: :  
Application for Licensure of :  
Agents, Brokers and Consultants :  
Under the Section 16-115c :  
of the Public Utilities Act. :

Docket No. 11-0262

CHIEF CLERK'S OFFICE

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ILLINOIS  
COMMERCE COMMISSION

**Peter D. Theodore**  
President, Wrightwood Energy Services, Ltd.  
2662 N. Orchard St #1  
Chicago, IL 60614  
[peter@wrightwoodenergy.com](mailto:peter@wrightwoodenergy.com)

**Response to Administrative Law Judge's Ruling**

**Section 454.60 Managerial Licensing Requirements**

83 III Adm. Code 454.60(c) indicates that Applicant shall include in its application an exhibit containing a corporate organizational chart and indicating the position of persons indicated in subsection (a) of this Section.

*In its application, Applicant did not include the aforementioned corporate organizational chart. Applicant is directed to provide an exhibit containing a corporate organizational chart and indicating the position of persons indicated in subsection (a) of this Section to comply with Subsection 454.60(c).*

**Response:**

Organizational Chart with summary is included in this response. [Attachment A]

**Section 454.70 Technical Licensing Requirements**

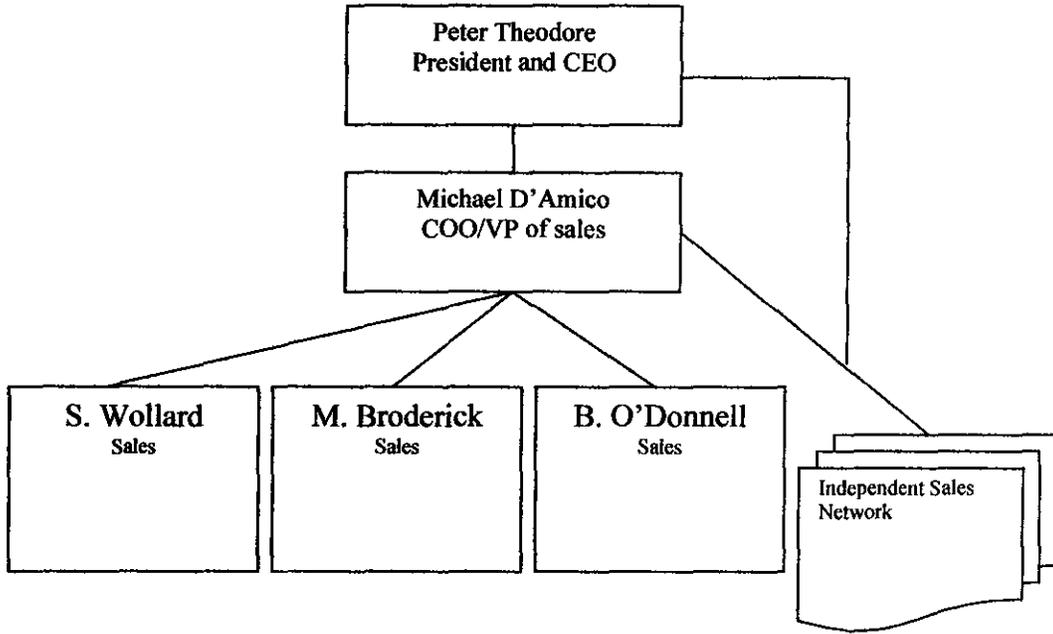
83 III Adm. Code 454.70(a) provides that an Applicant shall be deemed to possess sufficient technical capabilities to provide agency, brokering or consulting services if the Applicant can demonstrate that it has had an individual(s) with experience(s) in the electric industry of at least one year.

*Applicant indicated in paragraph 5 of its application that Mr. Theodore has been intimately involved in energy purchasing decisions. In addition, Applicant indicated in Attachment B that Mr. Theodore has over ten years of experience dealing with utilities on behalf of its tenants. Applicant is directed to provide more details regarding the aforementioned two experiences of Mr. Theodore such as the duties and the duration (month and year) of those experiences.*

**Response:**

See Attachment B

**Attachment A**



**Peter D. Theodore:** President

Mr. Theodore's experience and involvement was thoroughly discussed in the initial application. Clarification and further documentation of his qualifications under 83 III Adm. Code 454.70 will be discussed in Attachment B

**Michael A. D'Amico:** COO and VP of Sales

Mr. D'Amico brings more than 15 years of sales and sales management experience to WES. In large part, Mr. D'Amico is responsible for the sourcing and management of the independent sales network, which will increase distribution and exposure of WES' utility consulting services. Also, Mr. D'Amico has three years experience as a self-employed consultant in the hotel industry. In this capacity, he has advised ownership groups on all aspects of the operation of branded hotel spaces with special emphasis on operating cost reductions. A primary strategy he's used in this endeavor was the evaluation of the wholesale utility markets that existed in the states which his clients operated hotel properties.

**Sales Associates:**

In addition to the independent sales network channel, WES has agreed to hire, pending approval of this application, three dedicated sales representatives.

## **Attachment B**

As stated in Wrightwood Energy Services' original application, Mr. Theodore possesses professional experience that is highly relevant in the electric industry. Primary among these is his experience in the capital markets, specifically the energy markets. In the course of operating in these markets, Mr. Theodore gained expertise in both the futures markets and the underlying cash markets, and has analyzed the supply/demand factors that impact the price discovery of the electricity market. It is the Applicant's belief that this experience provides an extremely valuable and unique perspective to WES and its clients in a way that merely selling wholesale electricity would not.

In addition to Mr. Theodore's capital markets experience, he has been the managing partner of JP Real Estate Partnership since September, 1999. In this capacity, he managed a portfolio of commercial real estate holdings. Among the services he came to provide to his tenants, Mr. Theodore would regularly evaluate their electricity usage and advise them on ways to cut energy costs. Beginning in 2005, on behalf of a tenant operating a dry cleaning plant, Mr. Theodore would conduct a yearly audit of the tenant's electricity load. He would then evaluate available wholesale electric market offers and help the tenant evaluate these options. This dry cleaning plant and laundry facility, like all others, was a heavy user of both electricity and natural gas. As such, it was helpful to the tenant to consider purchasing both in the wholesale marketplace.

Soon after, these utility audits and evaluations were offered to and provided for other JP Real Estate tenants. It is this experience that has led Mr. Theodore to start Wrightwood Energy Services, and to seek an ABC License from the ICC.

### **Summary:**

It is the Applicant's hope that the Administrative Law Judge finds that the relevant experiences of Mr. Theodore are more than sufficient to satisfy the Technical Licensing Requirements of Section 454.70. While Mr. Theodore's experience comes mainly from entrepreneurial endeavors, his breadth of technical capability in the electric industry is unique and germane to the wholesale market. He brings a unique and valuable perspective to the ABC community through his analysis of the price discovery process, as well as his experience helping his tenants understand the wholesale electric and gas markets.

**Experience relevant to the Section 454.70 Technical Licensing Requirements**

**Peter D. Theodore**

**1991 - 2010:**

**PDT Investments**

From 2004-2010, primary focus was on the energy markets, specifically the West Texas Crude Oil, Brent North Sea Crude Oil, and Natural Gas futures and options markets. Gained relevant experience evaluating relationships between these markets as well as attendant factors involved in electricity and natural gas retail pricing.

**1999 - Present:**

**JP Real Estate Partnership**

In the course of managing commercial real estate portfolio, helped evaluate wholesale electricity market offers on behalf of tenants. Specifically, beginning in 2005, he conducted a yearly audit of tenants' electricity load and advised tenants of available options in the wholesale market.

**Michael D'Amico**

**2007-2010:**

**Consultant-Hospitality Industry**

Advised ownership groups of branded hotel properties in efficient operation and cost reduction. Among the focuses of this practice was the evaluation of wholesale electric markets in states with deregulated utilities.

To Whom It May Concern:

April 26<sup>th</sup>, 2011

As owner of Sparkle Cleaners of Evanston, I have been a tenant of JP Real Estate Partnership, and Peter Theodore since 1999. Beginning in 2005, Mr. Theodore has assisted us by evaluating some opportunities for us to participate in the wholesale electric and natural gas marketplace. One of our largest business expenses is energy, and Peter's expertise in this market was invaluable to the operation of our business.



Sincerely,  
Kely Ibrahim



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Owner-Sparkle Cleaners of Evanston

**Verification**

State of Illinois  
County Of Cook

Peter Dane Theodore, being first duly sworn, deposes and says that he is the president of the Wrightwood Energy Services, Ltd; that he has read the foregoing response to the administrative law judge's ruling, and all of the attachments accompanying and referred to within law judge's ruling; 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.

  
Peter Dane Theodore

Subscribed and sworn to before me  
this 27 day of April, 2011.

  
Notary Public

[Stamp of Notary]

