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STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Quantum Gas & Power Services, Ltd. :
:
Application for Licensure of :
Agents, Brokers, and Consultants :
under Section 16-115C :
of the Public Utilities Act. :

Docket No. 11-0439

BRIEF ON EXCEPTIONS

I. PRELIMINARY MATTERS

On May 19, 2011, Quantum Gas & Power Services, Ltd. ("Applicant") filed a verified application with the Illinois Commerce Commission ("Commission") requesting a certificate of service authority to operate as an agent, broker or consultant ("ABC") in Illinois pursuant to Section 16-115C of the Public Utilities Act ("Act"), 220 ILCS 5/1-101 et seq., and 83 Ill. Adm. Code 454 ("Part 454"). Applicant requests authority to offer services as an ABC for the procurement or sale of retail electricity supply for third parties in the State of Illinois. The Administrative Law Judge requested additional information and clarification of certain matters contained in the application. This document is intended to serve as the Applicant's response to the Administrative Judge's ruling.

II. REQUIREMENT FOR ALL APPLICANTS UNDER SECTION 16-115C OF THE ACT

Applicant has complied with all requirements to renew its license to transact business in Illinois. Applicant will comply with all applicable regulations; that it will comply with informational and reporting requirements established by Commission rule; that it will comply with informational and reporting requirements pursuant to Section 16-115C of the Act; and that it will comply with all other laws, regulations, terms and conditions required to the extent it has application to the services being offered by an ABC. Applicant as agreed to ensure that any person who acts on its behalf will comply

with all applicable sections of Part 454. Applicant agrees that it will remain in compliance with the provisions of the Act and Part 454, and will 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. Applicant has agreed to adopt and follow rules and procedures to preserve the confidentiality of its customers' data.

III. FINANCIAL, TECHNICAL, AND MANAGERIAL REQUIREMENTS OF SECTION 16-115C

Applicant has provided a surety bond in the amount of \$5,000 issued by a qualifying surety authorized to transact business in Illinois.

Applicant has demonstrated it meets the managerial qualifications via the previously submitted occupational background information of its Principals that are necessary to provide services as an ABC.

Applicant has the technical qualifications necessary to provide services as an ABC. The Applicant's Principals, Joseph F. Aliceaacosta and Beth Perry Sewell, ("Principals") possess the technical skills necessary to provide services as an ABC. The Applicant's Principals have been acting as agents and providing brokerage and consulting services to customers and clients in Texas, Washington, Michigan, New York, New Jersey and Pennsylvania since 2003.

Applicant has internal processes to secure customer signature to request consumption data, manipulate and analyze the data, secure multiple bids for the customer to consider, explain the differences in structures, implement the customer's decision and then track the decision progress with the supplier to ensure correctness of pricing, services etc.

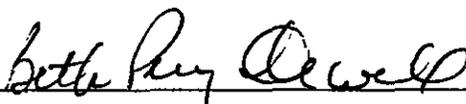
Although licensure to provide ABC services is not required in the State of Texas, Applicant is licensed as an Aggregator in the State of Texas. No other state Applicant does business in requires licensing as an Aggregator, Agent, Broker or Consultant.

Applicant is not aware of any complaints filed in any jurisdiction it provides services in the natural gas and electric industry.

WHEREFORE, Applicant requests 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,

Quantum Gas & Power Services, Ltd.

By: 

Beth Perry Sewell

Managing Partner

Kevin J. Smith

Smith & Cerasuolo, LLC

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Houston, TX 77063

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(713) 782-6785 (fax)

VERIFICATION

STATE OF Texas)
COUNTY OF Harris)

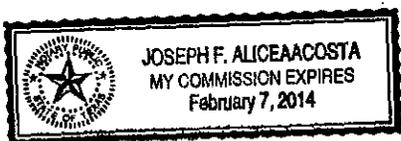
Beth Perry Sewell, being first duly sworn, deposes and says that she is a Managing Partner of Quantum Gas & Power Services, Ltd.; that she has read the foregoing Brief on Exceptions of Quantum Gas & Power Services, Ltd.'s Application for Licensure of Agents, Brokers, and Consultants, Docket No. 11-0439, and that the statements contained in the Brief on Exceptions are true, correct and complete to the best of her knowledge, information and belief.

Beth Perry Sewell
Beth Perry Sewell

Subscribed and sworn to before me
this 12 day of September, 2011.

Joseph Alicea Costa
Notary Public

[Stamp of Notary]





Gas & Power Services, Ltd.

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September 12, 2011

Chief Clerk
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701

Re: Docket # 11-0439

To Whom It May Concern:

This letter is intended to inform the Chief Clerk's office that Quantum Gas & Power Services, Ltd. submitted its Brief on Exceptions to Administrative Law Judge Yoder and 2 assistants, Phil Hardas and Yassir Rashid, individually via U.S. mail to 527 E. Capitol Avenue, Springfield, IL 62701. Enclosed is a copy for your records.

Thank you very much for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads 'Beth Perry Sewell'.

Beth Perry Sewell
Managing Partner

enclosure

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