

ILLINOIS COMMERCE COMMISSION

2012 FEB -6 1 A 11: 06

RMI Consulting, Inc.

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

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CHIEF CLERK'S OFFICE
Docket No: 12-096

APPLICATION

RMI Consulting, Inc. ("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. Applicant's name and street address.

RMI Consulting, Inc. (a wholly owned subsidiary of INTL FCStone Inc.)
230 South LaSalle Suite 10-500
Chicago, IL 60604

2. Related Information:

- Type of business entity: corporation
- Jurisdiction in which and under whose laws business entity was created:
 - RMI Consulting, Inc. was incorporated with the state of IL.
- Other names under which Applicant does business (D/B/A):
 - RMI Consulting, Inc. does not do business within the state of IL under any alias.

3. Contact Persons for the following:

a) issues related to processing this application:

Brian Good
Analyst
2709 SW 29th St
Topeka, KS 66614
(785)232-2252
Brian.Good@intlfcstone.com

b) issues related to complaint resolution [454.130]

Shane Mathis
Managing Director

2709 SW 29th St
Topeka, KS 66614
(785) 232-2252
Shane.Mathis@intlfcstone.com

4. Description of Applicant's business. [454.40(c)(1)]
 - RMI Consulting, Inc. is applying for an electric broker license in the state of Illinois to provide procurement plan consulting and electricity brokerage services to commercial and industrial corporations.

5. A statement in support of application (including supporting documents and schedules if necessary) certifying the applicant meets the requirements of Section 16-115C of the Act. [454.40(d)(1)]
 - RMI has facilitated the development and execution of over 80 risk management programs on behalf of utility and corporate customers.
 - RMI executes approximately \$16 billion in energy contracts for its clients each year.
 - RMI customers purchase over 2 TCF of natural gas annually.
 - RMI customers have an excess of 80,000 MW of electric generation.
 - RMI has provided expert testimony and presentations on behalf of utility risk management programs to 12 state commissions and 7 city commissions.
 - RMI is currently a licensed electricity broker in the states of Maryland (License No. IR-1685), Massachusetts (License No. EB-081), and Ohio (License No. 11-5943-EL-AGG).
 - RMI is currently submitting applications for licenses in the following states: Delaware, Washington D.C., Maine, New Jersey, Pennsylvania, and Rhode Island

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)]

John Snell
230 S. LaSalle St – Suite 10-500
Chicago, IL 60604
Office: (312)373-8250
Fax: (312)277-3349
Email: John.Snell@intlfcstone.com

7. A statement to disclose whether the Applicant is licensed as an agent, broker or consultant in any other jurisdictions, similar to the licensure required under Section 16-115C of the Illinois Public Utilities Act. Additionally, the Applicant is directed to disclose whether it has had any complaints filed against it for its provision of any services in the electric or gas industry in this or any other jurisdiction. If yes, the Applicant is directed to include in its response the nature of the complaint, the jurisdiction, and the ultimate resolution.
- RMI is currently a licensed electricity broker in the states of Maryland (License No. IR-1685) Massachusetts (License No. EB-081), and Ohio (11-5943-EL-AGG).
 - RMI is currently submitting applications for licenses in the following states: Delaware, Washington D.C., Maine, New Jersey, Pennsylvania, and Rhode Island
 - RMI has not had any complaints filed against it for provision of any services in the electric or gas industry in this or any other jurisdiction.
8. RMI Consulting, Inc. 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)]
 - 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]

9. Applicant meets the managerial qualifications set forth in Part 454.60, as demonstrated in Attachment A. Attachment A 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 A 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).

TECHNICAL LICENSING QUALIFICATIONS [Section 454.70]

10. Applicant meets the technical qualifications set forth in Part 454.70, as demonstrated in Attachment A. Attachment A 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).

FINANCIAL LICENSING REQUIREMENTS [SECTION 454.80]

11. 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.

This qualifying surety is attached.

CODE OF CONDUCT [SECTION 454.90]

12. Applicant certifies that it shall:
 - a) Disclose in plain language in writing the nature of the services offered RMI Consulting, Inc;
 - 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;

Form for ABC Applicants

- 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]

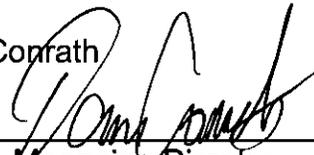
- 13. Applicant agrees to submit reports in accordance with annual reporting requirements. [454.110]

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,

Dan Conrath

By: _____


Managing Director

Attorney Contact Information

David Bolte

INTL FCStone, Inc.

2829 Westown Parkway

Suite 100

West Des Moines, IA 50266

Phone: (515)223-3797

Fax: (515)864-0294

VERIFICATION

STATE OF IL)
COUNTY OF MOON

Dan Conrath being first duly sworn, deposes and says that she/he is
[the] [a(n)] Managing Director [of][for] RMI Consulting, Inc. that he has read the foregoing
Application of RMI Consulting, Inc 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.

Dan Conrath
Dan Conrath Managing Director

Subscribed and sworn to before me
this 2 day of FEB, 2012

K. Oppelt
Notary Public

[Stamp of Notary]

