

Attachment B

Section 451.340 In the event the applicant does not meet the managerial qualifications set forth in this Section, the applicant shall demonstrate the extent its managerial resources and abilities match the services that it intends to provide to its customers. The Commission may impose such terms and conditions as deemed necessary in order to insure the applicant is managerially qualified, commensurate with the anticipated scope of the service to be provided and customers to be served.

With respect to serving residential and small commercial retail customers, an alternative retail electric supplier must maintain sufficient managerial resources and abilities to provide the service for which it has a certificate of authority. In determining the level of managerial resources and abilities that the alternative retail electric supplier must demonstrate, the Commission shall consider the following:

- 1) complaints to the Commission by consumers regarding the alternative electric supplier, including those that reflect on the alternative electric supplier's ability to properly manage solicitation and authorization; and***
- 2) the alternative electric supplier's involvement in the Commission's consumer complaint process, including the resources the alternative electric supplier dedicates to the process and the alternative electric supplier's ability to manage the issues raised by complaints, and the resolutions of the complaints.***

451.340(c)

IDT Energy does not employ the quantity of managerial staff with the specific skills that Section 451.340 requires, however, the abilities and managerial resources IDT utilizes to serve our customers is more than adequate in both scope and substance as specified in Section 451.340(c).

IDT currently serves close to 500,000 small volume customers in three different States on 23 different utility footprints with the vast majority of those customers being residential.

IDT Staff is in one of two locations: 1) Our corporate office is in Newark New Jersey where the Officers of the company as well as the parent company, Genie Energy, operate. There are approximately 15 employees in this office focusing on policy and planning of the company strategy for the future. Newark also houses our electric procurement department. 2) Jamestown NY is home to our Customer Service Center, which has our in house call center for inbound customer service, a quality control department, a compliance department, Gas Transportation Services Department, and Accounting services. There are 52 employees in Jamestown. IDT has a supplier agreement with BP, one of the world's largest suppliers of energy, as the primary supplier of all our energy. BP provides a financial and managerial support backstop for IDT and is the driver of our collective risk management strategies.

Examples of Managerial Staff :

Geoffrey Rochwarger, Chairman and Chief Executive Officer of IDT Energy

Geoffrey Rochwarger is the Chairman and Chief Executive Officer of IDT Energy, a wholly-owned subsidiary of Genie Energy. In addition, he serves as Vice Chairman of Genie Energy.

IDT Energy is the largest independent retail energy provider serving residential and small business customers in New York State, and serves rapidly-growing customer bases in New Jersey and Pennsylvania.

Mr. Rochwarger launched IDT Energy in November 2004 while serving as President of IDT Capital, a division of IDT Corporation (NYSE: IDT) that he founded to incubate new business initiatives.

IDT Energy has been profitable since its inception and has grown annual revenues to approximately \$200 million. At IDT, Mr. Rochwarger also served as the Executive Vice President of IDT Telecom and as a member of IDT Telecom's Board of Directors. At IDT Telecom, Geoff was instrumental in launching the Company's pioneering wholesale carrier telecommunications business.

Prior to joining IDT in 1995, Mr. Rochwarger served as the Senior Operations Manager at an international freight forwarding company.

Geoffrey Rochwarger earned his BA in Economics and Psychology at Yeshiva University in New York.

Terrence P. Stronz, CFO

Terry became the Chief Financial Officer for North American Energy, Inc. in October 2002 and Senior V. P. of Operations and Finance with IDT Energy in April 2005. Prior to that, he was a shareholder in Buffamante Whipple Buttafaro, P.C., the largest public accounting firm in the Southern Tier of Western New York.

In his role as CFO/Sr. V.P., Terry is responsible for all financial reporting for the company and overall management of the Jamestown, New York office. Daily responsibilities include: management of physical supply contracts, nominating and scheduling, financial hedging, risk management assessment, rate setting, product development and marketing, and MIS interface requirements. In addition, with North American Energy, he was responsible for all financing issues and dealing with lenders and suppliers on credit arrangements.

In his 20 years of experience in the public accounting field, Terry was responsible for providing quality, timely service to clients. He specialized in consulting with entities on profit enhancement, tax planning, negotiations with taxing authorities, and costing systems. The industries that Terry concentrated in were oil and gas, steel fabricators and various manufacturing entities.

Mr. Stronz was heavily involved in the administration of the accounting firm, including roles as, director of human resources, a member of the firm's executive committee, shareholder in charge of the Jamestown, New York office and a member of the compensation committee.

Terry graduated in 1982 from Saint Bonaventure University with a bachelor's degree in business administration with a concentration in accounting. He became a licensed Certified Public Accountant in 1984.

Terry is currently a member of the Chautauqua Region Community Foundation serving on the investment committee and formerly as a member of the grants committee. He is also a board member of the Jamestown Area YMCA serving as treasurer and Chair of the finance committee. Mr. Stronz has devoted time as a volunteer to the Jamestown YMCA Youth basketball Program, The Babe Ruth Baseball League and the United Way of Southern Chautauqua County. He served as a board member and treasurer of Moon Brook Country Club and The Chautauqua Region Multiple Sclerosis Society.

Wayne Stoughton, SVP Customer Services and Regulatory Affairs. Wayne is responsible for all customer service-related activities, including seeking and employing subcontractors, and developing sales scripting, quality control procedures and comprehensive reporting methods. He is also heavily involved with regulatory issues related to customer acquisition, billing and data exchange.

Wayne has served on numerous development committees of the EDI (electronic data interchange) protocol in New York State. He is member of the National Energy Marketers Association and sits on the Northeast Region Advocacy Team on Electric and Gas Policy.

He also oversees the IDT Energy Customer Service call center, which handles all internal and external customer-related calls. The call center is located in Jamestown, employing approximately 35 Customer Service Representatives along with an additional 7 supervisory employees. In addition there are 10 Quality Control agents he oversees who monitor all related activities.

Wayne is an active party to many utility rate cases as well as many energy-related initiatives. Wayne holds a Bachelor of Science degree in Business Management.

Prior to his employment with IDT Energy, Wayne spent a number of years in the drilling and production of natural gas and oil wells in the Appalachian Basin. His combined energy-related experience is nearly 25 years.

One of the key components that defines IDT Energy is our diligent follow up to any customer inquiry or complaint. Quality control is the backbone of that effort. With 10 front line employees plus several experienced managers, our QC department provides a valuable service to our customers. Prompt and efficient follow up to every inquiry is our standard. Current rates of new customer acquisition range from 4000-6000 per week. With this amount of activity there comes misunderstandings and complaints. Our goal is to resolve every complaint thoroughly and in the shortest amount of time.

Over the past 3 years our customer base has increased from 350,000 to nearly 500,000 small volume customer meters. Our call center receives approximately 15,000-18,000 calls each month ranging from complaints to inquiries to compliments. These numbers give some relativity to the number of complaints from customers we receive which total around 200 per month, each of which is resolved. We do get complaints from customers through various regulatory agencies. The quantities range from 0 to 12 per month. Each of these has also been satisfactorily resolved and there has been no complaint that has escalated to a dispute resolution moderated by any regulatory agency. Every complaint is resolved with every customer in a timely manner.

Each regulatory agency has its own standards and reporting requirements. IDT has developed relationships with every agency in order to best serve the needs of the customer while meeting those individual needs. Our efforts in the State of Illinois would continue to utilize our best practices model of customer service.