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Star Energy Partners LLC :  
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Application for Certificate of :  
Service Authority under Section :  
16-115 of the Public Utilities Act :

CHIEF CLERK'S OFFICE  
Docket No. 15076

**APPLICATION OF STAR ENERGY PARTNERS LLC  
FOR CERTIFICATE OF SERVICE AUTHORITY**

Star Energy Partners LLC ("Applicant"), hereby requests that the Illinois Commerce Commission ("Commission") grant it a certificate of service authority pursuant to Section 16-115 of the Public Utilities Act ("Act") to provide alternative retail electric supply services in the State of Illinois. Applicant is filing under Subpart D of Part 451. In support of its application, Applicant states as follows:

REQUIREMENTS FOR ALL APPLICANTS [451.20]

1. The Applicant does not currently have authority from the Commission to be an ARES.
2. Applicant is a licensed supplier of competitive retail electricity in Ohio (12-613E(2)) and Pennsylvania (A-2014-2452791). Applicant supplies competitive retail electricity to over 10,000 residential and commercial customers in Ohio and plans to be selling Pennsylvania within the next few months. Applicant has applied, but is pending approval, as a competitive electricity supplier in New Jersey. Further, no formal complaints have been filed against the Applicant, however, Applicant has received a total of 62 informal complaints filed by residential customers in Ohio since 2012. All of the following have been resolved to the satisfaction of all parties.
  - a) There were 48 complaints filed with the Public Utilities Commission of Ohio;
  - b) There were 12 complaints filed with the Better Business Bureau;
  - c) There were 2 complaints filed with the Ohio Attorney General's Office.
3. Applicant certifies that it will comply with all applicable Federal, State, regional and industry rules, practices, policies, procedures and tariffs for the use, operation, maintenance, safety, integrity, and reliability of the interconnected electric transmission system; [451.20(a)]
4. Applicant agrees to submit good faith schedules of transmission and energy in accordance with applicable tariffs. [451.20(a)]
5. Applicant certifies that it will comply with informational and reporting requirements that the Commission may by rule establish; [451.20(b)]
6. Applicant certifies that it will provide for review by Staff, on a confidential and proprietary basis, data related to contracts for the purchase and sale of electric power and energy; [451.20(b)]

7. Applicant's name and street address: [451.20(c)(1)]  
 Star Energy Partners LLC  
 3340 W. Market Street, Suite 100  
 Akron, Ohio 44333
  - a) Federal Employer Identification Number: [451.20(c)(2)] 61-1690134;
  - b) Type of business entity: Limited Liability Company;
  - c) Jurisdiction in which and under whose laws business entity was created:  
 Delaware;
  - d) Other names under which Applicant does business (d/b/a): None;
  - e) Registered Agent in Illinois:  
 National Corporate Research, Ltd.  
 520 South Second Street, Suite 403  
 Springfield, IL 62701
8. The Applicant shall demonstrate that:
  - a) Applicant is licensed to do business in the State of Illinois, as demonstrated in Exhibit A. [451.20(d)(1)]
  - b) Applicant's employees will **not** be installing, operating, and maintaining generation, transmission, or distribution facilities within the State of Illinois.
9. Applicant hereby certifies compliance with all other applicable laws and regulations and Commission rules and orders. [451.20(e)]
10. Applicant certifies it will procure renewable energy resources as required by Section 16-115D and subsection (d) of Section 16-115 of the Act. [451.20(f)]
11. Applicant certifies it will source electricity from clean coal facilities, as required by Section 16-115(d)(5) of the Act. [451.20(g)]

REQUIRED FILINGS AND PROCEDURES [451.30]

12. Applicant will publish notice of its application for certification in the Official State Newspaper within 10 days following its filing of the application for certification. The Applicant will file proof of publication with the Clerk of the Commission within five (5) days after publication. [451.30(a)]
13. This application for certification is verified as required by Section 200.130 of the Commission's "Rules of Practice" (83 Ill. Adm. Code 200.130).
14. Geographic area in which Applicant seeks to be authorized to offer alternative electric service to industrial, commercial and residential customers in the service territory of Commonwealth Edison and Ameren Illinois Company. [451.30(c)]
  - a) Description of Applicant's business: Applicant sells alternative/competitive retail electricity to residential and commercial consumers in all Ohio electric utilities, and is certified to sell alternative/competitive natural gas in Ohio. It is not affiliated with any utility, and does not directly or indirectly own transmission or generation facilities. [451.30(c)(1)]
  - b) Applicant plans to sell electricity, natural gas, and energy related products and services to residential and commercial consumers in multiple states. [451.30(c)(2)]

- c) Proof that Applicant notified the designated in-state agent for each affected utility that Applicant intends to serve customers in that utility's service area. [451.30(c)(3)] As demonstrated in Exhibit B, Applicant has properly informed the affected utility of this application and its desire to serve customers on the utility's system.
15. The Applicant hereby certifies compliance with all terms and conditions required by Sections 16-115A(a), (b), and (f), 16-119, 16-123, 16-125(b) and (c), 16-127, and 16-128(a) of the Act, to the extent those Sections have application to the services being offered by the alternative retail electric supplier. [451.30(d)(2)]
16. Application shall include Contact Persons for the following:
- a) Issues related to processing this application:  
 Shannon Dieringer, Paralegal  
 3340 W. Market Street  
 Akron, Ohio 44333  
 P: (330) 835-2483  
 F: (866) 540-8518  
 E: [sdieringer@stareenergypartners.com](mailto:sdieringer@stareenergypartners.com)
  - b) Issues related to retail customers, including complaint resolution:  
 Shannon Dieringer, Paralegal  
 3340 W. Market Street  
 Akron, Ohio 44333  
 P: (330) 835-2483  
 F: (866) 540-8518  
 E: [complaints@stareenergypartners.com](mailto:complaints@stareenergypartners.com)  
 And  
 Brandiann Portillo, Customer Operations Manager  
 3340 W. Market Street, Suite 100  
 Akron, Ohio 44333  
 P: (330) 436-5867  
 E: [bportillo@stareenergypartners.com](mailto:bportillo@stareenergypartners.com)
  - c) Technical issues, including scheduling of generation, transmission and distribution, and issues arising from relationships with other providers of electric services:  
 Anwar Rohan, Pricing Manager  
 3340 W. Market Street, Suite 100  
 Akron, Ohio 44333  
 P: (330) 436-5866  
 E: [arohan@stareenergypartners.com](mailto:arohan@stareenergypartners.com)
17. Applicant agrees to accept service by electronic means. [451.30(e)]

CUSTOMER RECORDS AND INFORMATION [451.40]

18. Applicant agrees to adopt and follow rules and procedures ensuring that authorizations received from customers, customer billing records, and requests for delivery service transmitted to utilities are retained for a period of not less than two (2) calendar years after the calendar year in which they were created. [451.40(a)]

19. Applicant agrees to adopt and follow rules and procedures to preserve the confidentiality of its customer's data. [451.40(b)]

#### LICENSE OR PERMIT BOND REQUIREMENTS [451.50]

20. Applicant is required to execute and maintain a copy of the 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 the amount specified in Part 451.50(a) for the appropriate group of customers the Applicant seeks to serve. Attached as Exhibit C is a copy of the bond in the amount of \$300,000 from a qualifying surety under the Department of Treasury's Listing of Approved Sureties (Department Circular 570) ([http://www.fiscal.treasury.gov/fsreports/ref/suretyBnd/c570\\_az.html](http://www.fiscal.treasury.gov/fsreports/ref/suretyBnd/c570_az.html)).

#### FINANCIAL QUALIFICATIONS [451.320]

21. Applicant meets one of the six financial criteria set forth in Part 451.320(a)(1-5), as follows:

Base Confirmation Agreement with a supplier, name of which is considered Confidential and Proprietary, is provided in Attachment D(1). Part 451.320(a)(1-5); and

Applicant's financial statements for 2013 and 2014 is provided in Attachment D(2). Part 451.320(a)(1-5).

22. Applicant will not provide electric power and energy with property, plant and equipment that it owns, controls, or operates.

#### TECHNICAL QUALIFICATIONS [451.330]

23. Applicant will not use electric generation, transmission or distribution facilities that it owns, controls or operates in serving customers. The Applicant satisfies the other technical qualifications contained in Part 451.330, as follows:

Applicant has the following key personnel with at least four (4) years' experience working for entities that are members of PJM, and each of whom have at least one (1) year of experience with responsibility for buying, selling and/or scheduling power in wholesale markets, see Exhibits E and F.

Tony Banks, President & CEO of Applicant, has almost 10 years of responsibility for buying and selling power and energy in wholesale markets his prior positions of Director/VP Sales & Marketing at FirstEnergy Solutions and President of Atlas Gas Marketing. See Mr. Banks' resume, Exhibit E.

Anwar Rohan, Pricing Manager, is Applicant's senior electricity and natural gas pricing expert who has four (4) years experience preparing pricing models and providing support buying and selling power and energy in wholesale markets in his current position at Star Energy Partners and prior positions at Glacial Energy from 2009 through 2012 and his position as Senior Pricing Analyst at PPL Energy Plus. See Mr. Rohan's resume, Exhibit E.

Applicant is also relying on a contractor, Exelon Generation Company, LLC, an affiliate of Constellation NewEnergy, Inc., to help meet the technical qualifications and acts as Applicant's PJM facing entity and thus performs all necessary services as Applicant's PJM scheduling agent through the Base Confirmation Agreement between Applicant and Exelon Generation Company, LLC, see Exhibit D(1). Both Ms. Horn and Ms. Smith work for Constellation NewEnergy, Inc., see Exhibit E.

Anne Marie Horn, Senior Trader, has more than four (4) years' experience buying and selling power and energy in wholesale markets, with more than one (1) year scheduling for Constellation, a member of PJM. Ms. Horn joined Constellation in July 1999 and is responsible for monitoring the Midwest electricity markets, including both MISO and PJM. Specifically, Ms. Horn has more than nine (9) years' experience in electric market operations and more than four (4) years' experience with MISO and PJM.

Mary Ann Smith, Manager, Power Scheduling, has more than four (4) years' experience buying and selling power and energy in wholesale markets, with more than ten (10) years scheduling for Constellation, a member of PJM. Ms. Smith joined Constellation in February 2004 and currently manages the group that schedules power in PJM, NYISO, NEPOOL, IMO and MISO, and schedules these regions when needed. Specifically, Ms. Smith has more than 11 years of experience in electric market operations and more than 12 years of experience in power scheduling.

Applicant agrees to maintain the following telephone number and address where Applicant's staff can be directly reached at all times. Applicant understands that maintenance of answering service or machine, pager, or similar message-taking procedure does not satisfy the requirements. [451.330(c)]

Telephone Number – Business Hours: 1-855-427-7827  
Alternative Number: 330-436-5867  
After Hours: 216-242-1173  
Address: 3340 W. Market Street, Suite 100  
Akron, Ohio 44333

Further, Applicant's electric supplier, Exelon Generation, affiliate of Constellation, maintains a 24-hour desk for Supply and Scheduling, as follows:

Telephone Number – 24 hours a day; 7 days a week: 410-468-3530  
Address: 100 Constellation Way, Suite 500  
Baltimore, Maryland 21202

MANAGERIAL QUALIFICATIONS [451.340 and 451.350]

24. Applicant meets the managerial qualifications set forth in Part 451.340, as demonstrated in Exhibits F, and G. Exhibit F is a functional organization chart and Exhibit G is a narrative of the individuals in the organization who are being used to meet each of the managerial requirements and each of their resumes, Part 451.340(b).

Tony Banks, President & CEO of Applicant has over 20 years of senior management experience that includes bottom line P&L responsibility in the competitive energy markets in his prior positions with FirstEnergy Solutions, as President & CEO of Atlas America, CFO of Atlas American and President of Atlas Gas Marketing. See Mr. Banks resume, Exhibit G.

David Cass, COO, has over six (6) years of managerial and bottom line P&L responsibility in his prior Vice President position at Saybrook Capital where he participated as a board member of several of Saybrook's portfolio companies and had direct responsibility for turning around unprofitable and struggling operations. See Mr. Cass' resume, Exhibit G.

Joseph Cepparulo, Director, Energy Operations is Applicant's senior leader of electricity and natural gas operations and has over six (6) years managerial responsibility for performance of competitive natural gas businesses of Glacial Energy in his position of VP Gas Supply at Glacial Energy and MX Energy in his position as Manager Gas Operations. See Mr. Cepparulo's resume, Exhibit G.

25. Applicant is relying on one contractor to meet the technical requirements of 451.330.  
26. Applicant is not-relying on one or more agents or contractors to meet the technical and/or managerial requirements of Part 451.120 and 451.130, 451.230 and 451.240, 451.340 or 451.420.

FINANCIAL QUALIFICATIONS FOR SINGLE BILLING SERVICE [451.510]

26. Applicant does not intend to provide single billing services.

GENERAL PROVISIONS FOR APPLICANTS FILING UNDER SUBPART D [451.310]

27. Applicant hereby certifies compliance with all terms and conditions required by Section 16-115A(c) of the Act. [451.310(a)]  
28. Applicant has no limitations that are imposed on the number of customers or maximum load to be served and Applicant certifies that it will not deny service to a customer or group of customers nor establish any differences as to prices, terms, conditions, services, products, facilities, or in any other respect, whereby such denial or differences are based on race, gender or income nor deny service to a customer or group of customers based on locality nor establish any unreasonable differences as to prices, terms, conditions, services, products, or facilities as between localities. [451.310(b)]

29. Applicant has not been denied an electric supplier license in any state in the United States. [451.310(c)(1)]
30. Applicant has not had an electric supplier license suspended or revoked by any state in the United States. [451.310(c)(2)]
31. Applicant has an alternative/competitive retail electric supplier license applications pending in the United States in the following states: New Jersey and Pennsylvania. [451.310(c)(3)]
32. Applicant is not subject to any lawsuits that were filed in a court of law. There have been a total of 51 complaints filed by residential customers in Ohio with the Public Utilities Commission (40), Better Business Bureau (10), and Attorney General's Office (1) since 2012, all of which have been resolved to the satisfaction of all parties. No formal complaints have been filed against Applicant alleging fraud, deception or unfair marketing practices, or other similar allegations. [451.310(c)(4)]
33. Applicant certifies that its marketing materials which make statements concerning prices, terms and conditions of service contain information that adequately discloses the prices, terms and conditions of the products or services that the Applicant is offering or selling to the customer. [451.310(d)(1)]
34. Applicant certifies that before any customer is switched from another supplier, Applicant will give the customer written information that adequately discloses, in plain language, the prices, terms and conditions of the products and services being offered and sold to the customer. [451.310(d)(2)]
35. Applicant certifies it will provide documentation to the Commission and to customers that substantiates any claims made by the Applicant regarding the technologies and fuel types used to generate the electricity offered or sold to customers. [451.310(d)(3)]
36. Applicant certifies it will provide to the customer itemized billing statements that describe the products and services provided to the customer and their prices, and provide an additional statement, at least annually, that adequately discloses the average monthly prices, and the terms and conditions, of the products and services sold to the customer. [451.310(d)(4)]
37. Applicant certifies it will include materials comprising the consumer education program (pursuant to Section 16-117 of the Act [220 ILCS 5/16-117]) with all initial mailings to potential residential and small commercial retail customers and before executing any agreements or contract with such customers, and that Applicant will provide these materials at no charge to residential and small commercial retail customers upon request. [451.310(e) and 451.310(f)]
38. Applicant certifies it will provide to residential and small commercial retail customers on a semiannual basis information on how to obtain a list of alternative retail electric suppliers that have been found in the last 3 years by the Commission (pursuant to Section 10-108 of the Act [220 ILCS 5/10-108]) to have failed to provide service in accordance with the terms of their contracts (pursuant to Section 16-117(g)(4)(C) of the Act). [451.310(g)]
39. Applicant certifies it will maintain sufficient managerial resources and abilities to provide the service for which it has a certificate of authority. [451.340(d)]

WHEREFORE, Applicant requests that the Commission grant its Application for service authority to serve retail customers in all service classifications throughout the State of Illinois.

Respectfully submitted,  
STAR ENERGY PARTNERS LLC

By:   
\_\_\_\_\_  
Tony C. Banks, President & CEO

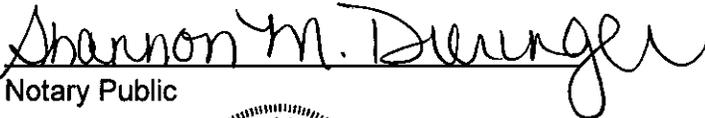
VERIFICATION

STATE OF OHIO            )  
                                  )  
COUNTY OF SUMMIT    )            ss:

Tony C. Banks, being first duly sworn, deposes and says that he is the President and CEO of Star Energy Partners LLC and that he has read the foregoing Application of Star Energy Partners 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.

  
\_\_\_\_\_  
Tony C. Banks

Subscribed and sworn to before me this 4<sup>th</sup> day of March, 2015.

  
\_\_\_\_\_  
Notary Public

[Stamp of Notary Public]  
  
Shannon M. Dieringer  
Resident Summit County  
Notary Public, State of Ohio  
My Commission Expires: 10/27/2016