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Star Energy Partners LLC	:	
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Application for Certificate of	:	Docket No. 15-0312
Service Authority under Section	:	
16-115 of the Public Utilities Act	:	

2015 APR 29 A 11: 24
CHIEF CLERK'S OFFICE
ILLINOIS COMMERCE COMMISSION

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.
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
(888) 883-6300

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@starenergypartners.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@starenergypartners.com
       And
       Brandiann Portillo, Customer Operations Manager
       3340 W. Market Street, Suite 100
       Akron, Ohio 44333
       P: (330) 436-5867
       E: bportillo@starenergypartners.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@starenergypartners.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_a-z.html).

FINANCIAL QUALIFICATIONS [451.320]

21. Applicant meets one of the six financial criteria set forth in Part 451.320(a)(2) as follows. All information provided hereto is considered Confidential and Proprietary:

    Applicant provides a schedule showing the currently available amount of each line of credit, Exhibit D(1) and an estimate of the available amount of each of line credit through June 2015, Exhibit D(2), including all deductions resulting from any covenants or other limitations governing the supplier agreement referenced in Attachments D(3)(a) thru D(3)(f). Part 451.320(a)(2)(c)(i);

    Applicant provides all credit agreements with its electric supplier in Exhibits D(3)(a) thru D(3)(f). Part 451.320(a)(2)(c)(ii);

    Applicant's financial statements for 2013 and 2014, along with Verification of such information is provided in Exhibit D(4). Part 451.320(a)(2)(c)(iv); and

    Applicant provides a schedule showing the calculation of 10% of revenue with a reference to the Applicant's internal documents, Exhibit D(4), for the revenue input of the calculation, provided in Exhibit D(5). Part 451.320(a)(2)(c)(v).

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 buying and selling power and energy in wholesale markets and one year scheduling experience working for an entity that is either a member of PJM, a market participant in the Midwest ISO, or has a system

operator certificate from NERC, or has earned Certified Energy Procurement Professional status by the Association of Energy Engineers or equivalent certification. Part 451.330(b)

Tony Banks, President & CEO of Applicant. Mr. Banks has over four years' experience buying and selling power and energy in wholesale markets in his prior positions as Direct/VP Sales & Marketing at FirstEnergy Solutions (2004 to 2012) and President, Atlas Gas Marketing (1995 to 1998). In both positons, Mr. Banks oversaw the energy position reports and gave direction to the supply teams as to buying and selling requirements to maintain a balanced book. Mr. Banks' duties for each position are more detailed in his resume, which is incorporated herein as Exhibit E. Part 451.330(a).

Anwar Rohan, Pricing Manager. Mr. Rohan has over four years' experience buying and selling power and energy in wholesale markets between his current positon (January 2014 to present) and prior positions at Glacial Energy as Pricing Analyst (2009 to 2010), Pricing Manager (2010 to 2011) and Pricing Director (2011 to 2012), Residential Pricing Director (March 2012 to November 2012); Consultant for HBR Consulting Group (January 2013 to July 2013); and as Sr. Pricing Analyst at PPL EnergyPlus (August 2013 to November 2013). In his positions Mr. Rohan has been directly responsible for preparing pricing models and providing support buying and selling power and energy in wholesale markets. Mr. Rohan's duties for each position are more detailed in his resume, which is incorporated herein as Exhibit E. Part 451.330(a).

Applicant relies on its Supplier to help meet the technical qualifications and act as Applicant's PJM facing entity, and thus performs all necessary services as Applicant's PJM scheduling agent through the Supplier Agreement referenced in Exhibits D(3)(a) thru D(3)(f). The following named individuals are agents or contracts to Applicant and both are employed by the Supplier

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 Supplier, a member of PJM. Ms. Horn joined Supplier 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. Ms. Horn's specific duties are more fully described in Exhibit E. Part 451.330(a).

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 Supplier, a member of PJM. Ms. Smith joined Supplier 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. Ms. Smith's specific duties are more fully described in Exhibit E. Part 451.330(a).

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 Supplier 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(a), as demonstrated below and in more detail in Exhibit F. Part 451.340(a).

The following individuals have four or more years of experience with enterprise financial and administration responsibilities, including profit and loss responsibilities:

Tony Banks, President & CEO of Applicant. Mr. Banks has had more than two years' experience in his current position as President & CEO and also brings more than four years' experience with enterprise financial and administration responsibilities, including profit and loss responsibilities in his prior positions as Director/VP Sales & Marketing and VP Business Development with FirstEnergy Solutions (2004 to 2012); President & CEO of Atlas America, Inc. (2000 to 2003); and Sr. Vice President and CFO of Atlas America, Inc. (1995-1998). In each of his roles, Mr. Banks has been responsible for the overall performance of each of the businesses, including bottom line P&L responsibility. Mr. Banks' duties for each position are more detailed in his resume, which is incorporated herein as Exhibit F. Part 451.340(a).

David Cass, COO. Mr. Cass brings to his current role as COO more than four years' experience with enterprise financial and administration responsibilities, including profit and loss responsibilities, from his prior position as Vice President 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 (2008 to 2014). Mr. Cass' duties for the positions he has held are more detailed in his resume, which is incorporated herein as Exhibit F. Part 451.340(a).

Joseph Cepparulo, Director Energy Operations. Mr. Cepparulo has more than two years' experience in his current position as Director, Energy Operations, which includes front-line responsibility for the operations and margin management for the enterprise. Mr. Cepparulo brings to his current position over four years' experience in management responsibility for administration and the financial performance of the competitive natural gas businesses as VP of Gas Supply at Glacial Energy (2009 to 2012) and Manager of Gas Operations at MX Energy (2006 to 2009). Mr. Cepparulo's duties for each position are more detailed in his resume, which is incorporated herein as Exhibit F. Part 451.340(a).

The following individuals have four or more years of experience buying and selling power and energy in wholesale markets:

Tony Banks, President & CEO of Applicant. Mr. Banks has over four years' experience buying and selling power and energy in wholesale markets in his prior positions as Direct/VP Sales & Marketing at FirstEnergy Solutions (2004 to 2012) and President, Atlas Gas Marketing (1995 to 1998). In both positons, Mr. Banks oversaw the energy position reports and gave direction to the supply teams as to buying and selling requirements to maintain a balanced book. Mr. Banks' duties for each position are more detailed in his resume, which is incorporated herein as Exhibit F. Part 451.340(a).

Anwar Rohan, Pricing Manager. Mr. Rohan has over four years' experience buying and selling power and energy in wholesale markets between his current positon (January 2014 to present) and prior positions at Glacial Energy as Pricing Analyst (2009 to 2010), Pricing Manager (2010 to 2011) and Pricing Director (2011 to 2012), Residential Pricing Director (March 2012 to November 2012); Consultant for HBR Consulting Group (January 2013 to July 2013); and as Sr. Pricing Analyst at PPL EnergyPlus (August 2013 to November 2013). In his positions Mr. Rohan has been directly responsible for preparing pricing models and providing support buying and selling power and energy in wholesale markets. Mr. Rohan's duties for each position are more detailed in his resume, which is incorporated herein as Exhibit F. Part 451.340(a).

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 Supplier, a member of PJM. Ms. Horn joined Supplier 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. Ms. Horn's specific duties are more fully described in Exhibit F. Part 451.340(a).

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 Supplier, a member of PJM. Ms. Smith joined Supplier 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. Ms. Smith's specific duties are more fully described in Exhibit F. Part 451.340(a).

The following individuals have four or more years of electric system operational experience:

Tony Banks, President & CEO of Applicant. Mr. Banks has over four years' electric systems operational experience in his prior positions as VP Sales & Marketing and VP Business Development at FirstEnergy Solutions where he utilized knowledge of operational and economic interplay of moving power from generating facility through the grid to the ultimate consumer to assure profitability by managing the price and volume risks of acquiring, transmitting, and delivering power. This experience was also utilized as Mr. Banks negotiated several transactions for the purchase and/or sale of certain generation, transmission, and distribution assets. Mr. Banks' duties for each positon are more detailed in his resume, which is incorporated herein as Exhibit F. Part 451.340(a)

Anwar Rohan, Pricing Manager. Mr. Rohan has over four years' experience buying and selling power and energy in wholesale markets between his current positon (January 2014 to present) and prior positions at Glacial Energy as Pricing Analyst (2009 to 2010), Pricing Manager (2010 to 2011) and Pricing Director (2011 to 2012), Residential Pricing Director (March 2012 to November 2012); Consultant for HBR Consulting Group (January 2013 to July 2013); and as Sr. Pricing Analyst at PPL EnergyPlus (August 2013 to November 2013). In his positions Mr. Rohan has been directly responsible for preparing pricing models and providing support buying and selling power and energy in wholesale markets. Mr. Rohan's duties for each position are more detailed in his resume, which is incorporated herein as Exhibit F. Part 451.340(a).

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 Supplier, a member of PJM. Ms. Horn joined Supplier 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. Ms. Horn's specific duties are more fully described in Exhibit F. Part 451.340(a).

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 Supplier, a member of PJM. Ms. Smith joined Supplier 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. Ms. Smith's specific duties are more fully described in Exhibit F. Part 451.340(a).

Applicant's corporate organizational charge in response to Part 451.340(b) is set forth in Exhibit G.

25. Applicant is relying on one or more agents or contractors to meet the technical requirements of Part 451.330 and Part 451.340. Each agent and contractor on whom the Applicant relies to meet these requirements is disclosed in Exhibits E, F and G. Exhibits E and F includes narratives and resumes of agent's or contractor's key personnel showing clearly how each applicable technical experience requirement is being met. Part 451.350(a). Exhibit G is the corporate organizational charge that identifies the agent or contractor and their role as part of the organization. Applicant certifies that each such agent or contractor will comply with all sections of Part 451 that are applicable to the functions to be performed by Applicant and its respective agents and contractors. Part 451.350(b).

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 application pending in the United States in New Jersey. [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)]

40. Applicant certifies in the event that the applicant bills any residential customer directly for supply, the applicant shall ensure that when marketing to residential customers who receive any type of low income energy assistance, the applicant has entered into the necessary agreements to allow low-income customers to receive Low Income Home Energy Assistance Program (LIHEAP) benefits and Percentage of Income Payment Program (PIPP) benefits. If the applicant is granted Commission authorization to provide supplier single billing to residential customers, the applicant shall ensure that, when marketing to residential customers who receive any type of low-income energy assistance, the applicant has entered into the necessary agreements to allow low-income customers to receive Low Income Home Energy Assistance Program (LIHEAP) benefits and Percentage of Income Payment Program (PIPP) benefits.

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
3340 W. Market Street, Suite 100
Akron, OH 44333
Phone: (330) 436-5865
Email: tbanks@starenergypartners.com

VERIFICATION

STATE OF OHIO)
) *ss:*
COUNTY OF SUMMIT)

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 24th day of April, 2015.

Shannon M. Dieringer
Notary Public

[Stamp]

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