

2015 DEC 31 P 12:45

Trident Retail Energy, LLC dba Trident Power

CLERK'S OFFICE :
Application for Certificate of :
Service Authority under Section :
16-115 of the Public Utilities Act. :

Docket No. 15-0452

APPLICATION

Trident Retail Energy, LLC dba Trident Power ("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"). Trident Retail Energy, LLC dba Trident Power is filing under subpart D of Part 451. In support of its application, Applicant states as follows:

REQUIREMENTS FOR ALL APPLICANTS [451.20]

1. Applicant currently does not have authority from the Commission to be an ARES.
2. Trident Retail Energy, LLC dba Trident Power is a registered electric and gas ESCO in the state of New York (ESCO Code TRID) and a licensed electricity and natural gas supplier in the state of Maryland (Electric License: IR-3577 / Gas License: IR-3579). Trident Retail Energy, LLC dba Trident Power has an EGS license pending in Pennsylvania. Please note that Trident has no formal complaints in Illinois or in any jurisdiction in which the company operates.
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;
4. Applicant agrees to submit good faith schedules of transmission and energy in accordance with applicable tariffs.
5. Applicant certifies that it will comply with informational and reporting requirements that the Commission may by rule establish;

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;
7. Applicant's name and street address:
 - Trident Retail Energy, LLC
 - 11152 Westheimer, Suite 118, Houston, TX 77042
 - a) Federal Employer Identification Number: 47-4240385
 - b) Type of business entity: Limited Liability Company
 - c) Jurisdiction in which and under whose laws business entity was created:
 - Texas
 - d) Other names under which Applicant does business (D/B/A): Trident Power
 - e) Registered Agent in Illinois: Northwest Registered Agents
8. The Applicant shall demonstrate that:
 - a) Applicant is licensed to do business in the State of Illinois, as demonstrated in **Attachment A**.
 - b) Applicant's employees will not be installing, operating, and maintaining generation, transmission, or distribution facilities within the State of Illinois.
9. Applicant certifies compliance with all other applicable laws and regulations and Commission rules and orders;
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.
11. Applicant certifies that it will source electricity from clean coal facilities, as required by Section 16-115(d)(5) of the Act.

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. Applicant will file proof of publication with the Clerk of the Commission within 5 days after publication.

13. Applications for certification shall be verified as required by Section 200.130 of the Commission's "Rules of Practice" (83 Ill. Adm. Code 200.130)
14. Applicant seeks to be authorized to offer electricity supply service to residential and commercial customers in the Commonwealth Edison service territory.
 - a) Applicant is a retail supplier of electricity and natural gas in the competitive retail markets of New York and Maryland. Applicant is not affiliated with an Illinois utility.
 - b) Applicant intends to service residential, small commercial, and large commercial customers.
 - 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, as demonstrated in **Attachment B**.
15. The applicant 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;
16. Applicant's Contact Persons are as follows:
 - a) Application Processing:
Amy Van Gelder, Chief Operating Officer
11152 Westheimer, Suite 118, Houston, TX 77042
amyvq@tridentpower.com
Direct: 832-864-1502 | Fax: 888-370-5423
 - b) Customer Support and Issue Resolution:
Al Barrios, Chief Marketing Officer
11152 Westheimer, Suite 118, Houston, TX 77042
abarrios@tridentpower.com
Direct: 832-864-1503 | Fax: 888-370-5423

- c) Technical and Scheduling Issues:
Amy Van Gelder, Chief Operating Officer
11152 Westheimer, Suite 118, Houston, TX 77042
amyvg@tridentpower.com
Direct: 832-864-1502 | Fax: 888-370-5423

17. Applicant agrees to accept service by electronic means.

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 calendar years after the calendar year in which they were created.
19. Applicant agrees to adopt and follow rules and procedures to preserve the confidentiality of its customer's data.

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 certification to serve. Copy of bond has been included as demonstrated in **Attachment C**.

FINANCIAL QUALIFICATIONS [451.320]

21. Applicant meets one of the six financial criteria set forth in Part 451.110(a)(1-6), 451.220(a)(1-6), or 451.320(a)(1-6), as demonstrated in **Attachment D**.
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.

Applicant meets the requirements of Part 451.330 as demonstrated in **Attachment E**.

The following individuals on Applicant's staff have experience working with Applicant's facilities or an electric generation, transmission, or distribution facility that is substantially similar to the facility that Applicant owns: **Not applicable. Applicant does not own an electric generation, transmission, or distribution facility.**

The following individuals on Applicant's staff have experience buying and selling power and energy in wholesale markets: Michael D. Osowski, Amy Van Gelder

The following individuals on Applicant's staff have 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): Michael D. Osowski, Amy Van Gelder, Denis Vermette, Al Barrios

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

Telephone # 832-276-2961

Fax # 888-370-5423

Address: 2050 W Sam Houston Pkwy S #1740
Houston, TX 77042

MANAGERIAL QUALIFICATIONS [451.340]

24. Applicant meets the managerial qualifications set forth in Part 451.340, as demonstrated in **Attachment F. Attachment G** includes an exhibit containing a corporate organizational chart and identifying the persons or agents who are being used to meet each of the requirements of Part 451.340(b).

The following individuals in management positions on Applicant's staff have four years experience with enterprise financial and administration responsibilities including profit and loss responsibilities: Michael D. Osowski, Denis Vermette, Amy Van Gelder

The following three individuals in management positions on Applicant's staff have four years experience buying and selling power and energy in wholesale markets: Michael D. Osowski, Denis Vermette, Amy Van Gelder

The following four individuals in management positions on Applicant's staff have four years electric system operational experience: Michael D. Osowski, Amy Van Gelder, Denis Vermette, Al Barrios

25. Applicant is not relying on one or more agents or contractors to meet the technical and managerial requirements of Part 451.330.

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 certifies compliance with all terms and conditions required by Section 16-115A(c) of the Act.
28. Applicant states there are no limitations that will be imposed on the number of customers or maximum load to be served and 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.
29. Applicant has not been denied an electric supplier license in any state in the United States.
 30. Applicant has not had an electric supplier license suspended or revoked by any state in the United States.
 31. Applicant has other electric supplier license applications pending in the United States: Pennsylvania
 32. Applicant is not the subject of any lawsuits that were filed in a court of law or formal complaints that were filed with a regulatory agency alleging fraud, deception or unfair marketing practices, or other similar allegations.
 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.
 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.
 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.
 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.
 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 contracts 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 residential and commercial retail customers in Commonwealth Edison's territory.

Respectfully submitted,

Amy Van Gelder

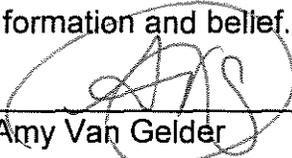
By: _____

Chief Operating Officer

VERIFICATION

STATE OF TEXAS)) ss:
COUNTY OF HARRIS)

Amy Van Gelder, being first duly sworn, deposes and says that she is the Chief Operating Officer of Trident Retail Energy, LLC dba Trident Power; that she has read the foregoing Application of Trident Retail Energy, LLC dba Trident Power, 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 her knowledge, information and belief.



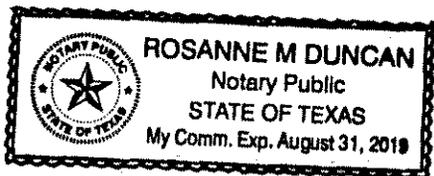
Amy Van Gelder

Subscribed and sworn to before me
this 28 day of December, [year]. 2015



Notary Public

[Stamp of Notary]





**Trident Retail Energy, LLC dba
Trident Power**

LIST OF ATTACHMENTS

ID	Description	IL Code Part
A	Illinois Approval to Transact Business	451.20(d)(1)
B	Proof of Notification to Serve in Com Ed's Service Territory	451.30(c)(3)
C	Permit Bond	451.50
D	Financial Qualifications	451.320(a)(3)
E	Technical Qualifications	451.330
F	Managerial Qualifications	451.340
G	Organizational Chart	451.340(b)



TRIDENT
P O W E R

ATTACHMENT A

Business License from State of Illinois



OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

NOVEMBER 23, 2015

0539272-1

NORTHWEST REGISTERED AGENT SER
1900 E. GOLF ROAD, STE 950A
SCHAUMBURG, IL 60173-0000

RE TRIDENT RETAIL ENERGY, LLC

DEAR SIR OR MADAM:

IT HAS BEEN OUR PLEASURE TO APPROVE YOUR REQUEST TO TRANSACT BUSINESS IN THE STATE OF ILLINOIS. ENCLOSED PLEASE FIND THE APPROVED APPLICATION FOR ADMISSION.

PLEASE NOTE! THE LIMITED LIABILITY COMPANY MUST FILE AN ANNUAL REPORT PRIOR TO THE FIRST DAY OF THIS MONTH OF QUALIFICATION NEXT YEAR. FAILURE TO TIMELY FILE WILL RESULT IN A \$300 PENALTY AND/OR REVOCATION. A PRE-PRINTED ANNUAL REPORT WILL BE MAILED TO THE REGISTERED AGENT AT THE ADDRESS ON OUR RECORDS APPROXIMATELY 45 DAYS BEFORE THE DUE DATE.

MANY OF OUR SERVICES ARE AVAILABLE AT OUR CONTINUOUSLY UPDATED WEBSITE. VISIT WWW.CYBERDRIVEILLINOIS.COM TO VIEW THE STATUS OF THIS COMPANY, PURCHASE A CERTIFICATE OF GOOD STANDING, OR EVEN FILE THE ANNUAL REPORT REFERRED TO IN THE EARLIER PARAGRAPH.

SINCERELY YOURS,

A handwritten signature in black ink that reads "Jesse White".

JESSE WHITE
SECRETARY OF STATE
DEPARTMENT OF BUSINESS SERVICES
LIMITED LIABILITY DIVISION
(217) 524-8008

Form LLC-45.5 May 2012 Secretary of State Department of Business Services Limited Liability Division 501 S. Second St., Rm. 351 Springfield, IL 62756 217-524-8008 www.cyberdrivellinois.com	Illinois Limited Liability Company Act Application for Admission to Transact Business <hr/> <div style="border: 1px solid black; padding: 2px; text-align: center;"> SUBMIT IN DUPLICATE Type or Print Clearly. </div> <hr/> This space for use by Secretary of State. Filing Fee: \$500 Penalty: \$ Approved: <i>JW</i>	FILE # This space for use by Secretary of State. <div style="text-align: center; font-size: 2em; font-weight: bold; margin-top: 20px;">FILED</div> <div style="text-align: center; margin-top: 10px;">NOV 23 2015</div> <div style="text-align: center; margin-top: 10px;"> JESSE WHITE SECRETARY OF STATE </div>
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1. Limited Liability Company Name: Trident Retail Energy, LLC
2. Assumed Name: _____
 (This item is only applicable if the company name in item 1 is not available for use in Illinois, in which case form LLC 1.20 must be completed and submitted with this application.)
3. Jurisdiction of Organization: Texas
4. Date of Organization: 05/22/2015
5. Period of Duration: Perpetual
 (Enter Perpetual unless there is a Date of Dissolution provided in the agreement, in which case enter that date.)
6. Address of the Principal Place of Business: (P.O. Box alone or c/o is unacceptable.)
- | | | |
|------------------------------------|--------|----------|
| <u>1900 E. Golf Road, STE 950A</u> | | |
| Number | Street | Suite # |
| <u>Schaumburg, IL 60173</u> | | |
| City | State | ZIP Code |
7. Registered Agent: NORTHWEST REGISTERED AGENT SERVICE, INC.
- | | | |
|------------|-------------|-----------|
| | | |
| First Name | Middle Name | Last Name |
- Registered Office: 1900 E. GOLF ROAD, STE 950A
- | | | |
|--------|--------|---------|
| | | |
| Number | Street | Suite # |
- (P.O. Box alone or c/o is unacceptable.)
- | | | |
|-------------------|-----------|--------------|
| <u>SCHAUMBURG</u> | <u>IL</u> | <u>60173</u> |
| City | State | Zip Code |
- Note: The registered agent must reside in Illinois. If the agent is a business entity, it must be authorized to act as agent in this state.
8. If applicable, Date on which Company first conducted business in Illinois: _____

(continued on back)

LLC-45.5

9. Purpose(s) for which the Company is Organized and Proposes to Conduct Business in Illinois: _____
Retail electric and natural gas marketing and sales

10. The Limited Liability Company: (check one)

a. Is managed by the manager(s) (List names and addresses.)

Michael Osowski, 1900 E. Golf Road, STE 950A, Schaumburg, IL 60173

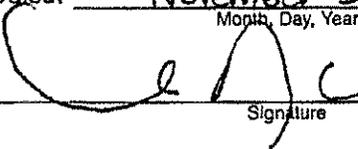
b. has management vested in the member(s) (List names and addresses.)

11. The Illinois Secretary of State is hereby appointed the agent of the Limited Liability Company for service of process under circumstances set forth in subsection (b) of Section 1-50 of the Illinois Limited Liability Company Act.

12. This application is accompanied by a Certificate of Good Standing or Existence, duly authenticated within the last 60 days, by the officer of the state or country wherein the LLC is formed.

13. The undersigned affirms, under penalties of perjury, having authority to sign hereto, that this application for admission to transact business is to the best of my knowledge and belief, true, correct and complete.

Dated: November 3, 2016
Month, Day, Year


Signature

Michael Osowski, Manager
Name and Title (type or print)

If applicant is signing for a Company or other Entity, state Name of Company and indicate whether it is a member or manager of the LLC.

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



Carlos H. Cascos
Secretary of State

Office of the Secretary of State

Certificate of Fact

The undersigned, as Secretary of State of Texas, does hereby certify that the document, Certificate of Formation for Trident Retail Energy, LLC (file number 802220743), a Domestic Limited Liability Company (LLC), was filed in this office on May 22, 2015.

It is further certified that the entity status in Texas is in existence.

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on November 03, 2015.



A handwritten signature in black ink, appearing to read "Cascos".

Carlos H. Cascos
Secretary of State

Phone: (512) 463-5555
Prepared by: SOS-WEB

Come visit us on the internet at <http://www.sos.state.tx.us/>
Fax: (512) 463-5709
TID: 10264

Dial: 7-1-1 for Relay Services
Document: 639031610003



ATTACHMENT B

**Proof of Notification of Trident Power's Intent to Serve
Retail Electricity in the Commonwealth Edison Service
Territory**



December 28, 2015

Thomas S. O'Neill
440 S. LaSalle St., Ste. 3300
Chicago, IL 60605

RE: Commonwealth Edison Company – Trident Retail Energy, LLC dba Trident Power

Mr. O'Neill,

Pursuant to Title 83, Chapter I, Subchapter C, Section 451.30(c)(3) of the Illinois Administrative Code, this notice should serve as Trident Power's intent to serve retail electricity to residential and non-residential customers in your service area upon our successful completion of the ARES licensure process.

Should you have any questions, my contact information is provided below.

Regards,

A handwritten signature in black ink, appearing to read "Amy D. Van Gelder", enclosed within a hand-drawn oval.

Amy D. Van Gelder
Chief Operating Officer
Trident Power
Direct: 281-864-1502
amyvg@tridentpower.com

11152 Westheimer, Suite 118
Houston, TX 77042

UPS Internet Shipping: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
Customers with a Daily Pickup
 Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com. Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.

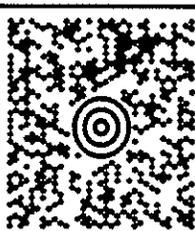
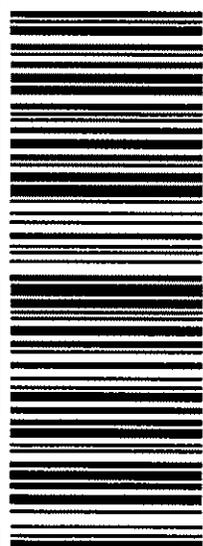
Hand the package to any UPS driver in your area.

UPS Access Point™
THE UPS STORE
11152 WESTHEIMER RD
HOUSTON ,TX 77042

UPS Access Point™
GAS DIP LP
10146 WESTHEIMER RD
HOUSTON ,TX 77042

UPS Access Point™
VIGOROUS VENTURE LLC
9550 RICHMOND AVE
HOUSTON ,TX 77063

FOLD HERE

<p>AMV VAN GELDER 281-684-1502 TRIDENT OPERATING LLC 11152 WESTHEIMER ROAD HOUSTON TX 77042</p> <p>SHIP TO: THOMAS O'NEILL COMMONWEALTH EDISON 440 S. LASALLE ST, SUITE 3300 CHICAGO IL 60605-5022</p>	<p>IL 606 9-02</p>  	<p>UPS 2ND DAY AIR A.M. 2A</p> <p>TRACKING #: 1Z 06F 275 07 9425 2943</p>		<p>BILLING: P/P</p>  <p>UPS 17.6.06. WNTNVS09 69 0A 10/2015</p>
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ATTACHMENT C

451.50(a) and 451.10

Trident Power is required to execute and maintain a license or permit bond issued by a qualifying surety or insurance company authorized to transact business in the State of Illinois in favor of the People of the State of Illinois.

As Trident Power seeks to serve all eligible retail customers, the amount of the bond is **\$300,000**.

In compliance with Section 451.10, Trident Power obtained the enclosed bond from The Hanover Insurance Company (NAIC #22292), which is on the Department of the Treasury's 'Listing of Certified Companies'.

Trident has included a copy of the issued bond as part of this attachment.

License or Permit Bond

License or Permit Bond No 1036625
The Hanover Insurance Company
440 Lincoln Street, Worcester, MA 01653

KNOW ALL MEN BY THESE PRESENTS, That we, Trident Retail Energy, LLC dba Trident Power as Principal, and The Hanover Insurance Company, a New Hampshire Corporation, and authorized to do business in Illinois, as Surety, are held and firmly bound unto THE PEOPLE OF THE STATE OF ILLINOIS as Obligee, in the sum of THREE HUNDRED THOUSAND AND NO/100 Dollars - - (\$300,000.00), for which sum, we bind ourselves, our heirs, executors, administrators, successors and assigns, jointly and severally, by these presents.

THE CONDITIONS OF THIS OBLIGATION ARE SUCH, That WHEREAS, the Principal has been or is about to be granted a license or permit to do business to operate as an ARES (Alternative Retail Electric Supplier) under 220 ILCS 5/16-115 and is required to execute this bond under 83 Illinois Administrative Code Part 451.50 by the Obligee.

NOW, Therefore, if the Principal fully and faithfully perform all duties and obligations of the Principal as an ARES, then this obligation to be void; otherwise to remain in full force and effect.

This bond may be terminated as to future acts of the Principal upon thirty (30) days written notice by the Surety; said notice to be sent to 527 East Capitol Avenue, Springfield, Illinois 62701, of the aforesaid State of Illinois, by certified mail.

Dated this 15th day of December, 2015.

Trident Retail Energy, LLC dba Trident Power

Principal

By: 

MICHAEL D. OSOWSKI - C.E.O.

The Hanover Insurance Company

Surety

By: 

Vickie Lacy, Attorney-In-Fact

THE HANOVER INSURANCE COMPANY
MASSACHUSETTS BAY INSURANCE COMPANY
CITIZENS INSURANCE COMPANY OF AMERICA

POWERS OF ATTORNEY
CERTIFIED COPY

KNOW ALL MEN BY THESE PRESENTS: That THE HANOVER INSURANCE COMPANY and MASSACHUSETTS BAY INSURANCE COMPANY, both being corporations organized and existing under the laws of the State of New Hampshire, and CITIZENS INSURANCE COMPANY OF AMERICA, a corporation organized and existing under the laws of the State of Michigan, do hereby constitute and appoint

Marc W. Boots, P.T. Osburn, Vickie Lacy, Joseph R. Aulbert and/or Maria D. Zuniga

of **Houston, TX** and each is a true and lawful Attorney(s)-in-fact to sign, execute, seal, acknowledge and deliver for, and on its behalf, and as its act and deed any place within the United States, or, if the following line be filled in, only within the area therein designated any and all bonds, recognizances, undertakings, contracts of indemnity or other writings obligatory in the nature thereof, as follows:

Any such obligations in the United States, not to exceed Twenty Five Million and No/100 (\$25,000,000) in any single instance

and said companies hereby ratify and confirm all and whatsoever said Attorney(s)-in-fact may lawfully do in the premises by virtue of these presents. These appointments are made under and by authority of the following Resolution passed by the Board of Directors of said Companies which resolutions are still in effect:

"RESOLVED, That the President or any Vice President, in conjunction with any Vice President, be and they are hereby authorized and empowered to appoint Attorneys-in-fact of the Company, in its name and as its acts, to execute and acknowledge for and on its behalf as Surety any and all bonds, recognizances, contracts of indemnity, waivers of citation and all other writings obligatory in the nature thereof, with power to attach thereto the seal of the Company. Any such writings so executed by such Attorneys-in-fact shall be as binding upon the Company as if they had been duly executed and acknowledged by the regularly elected officers of the Company in their own proper persons." (Adopted October 7, 1981 - The Hanover Insurance Company; Adopted April 14, 1982 - Massachusetts Bay Insurance Company; Adopted September 7, 2001 - Citizens Insurance Company of America)

IN WITNESS WHEREOF, THE HANOVER INSURANCE COMPANY, MASSACHUSETTS BAY INSURANCE COMPANY and CITIZENS INSURANCE COMPANY OF AMERICA have caused these presents to be sealed with their respective corporate seals, duly attested by two Vice Presidents, this **10th** day of **July 2013**.



THE HANOVER INSURANCE COMPANY
MASSACHUSETTS BAY INSURANCE COMPANY
CITIZENS INSURANCE COMPANY OF AMERICA

Robert Thomas, Vice President

Joe Brenstrom, Vice President

THE COMMONWEALTH OF MASSACHUSETTS)
COUNTY OF WORCESTER) ss.

On this **10th** day of **July 2013** before me came the above named Vice Presidents of The Hanover Insurance Company, Massachusetts Bay Insurance Company and Citizens Insurance Company of America, to me personally known to be the individuals and officers described herein, and acknowledged that the seals affixed to the preceding instrument are the corporate seals of The Hanover Insurance Company, Massachusetts Bay Insurance Company and Citizens Insurance Company of America, respectively, and that the said corporate seals and their signatures as officers were duly affixed and subscribed to said instrument by the authority and direction of said Corporations.



BARBARA A. GARLICK
Notary Public
Commonwealth of Massachusetts
My Commission Expires Sept. 21, 2018

Barbara A. Garlick, Notary Public
My Commission Expires September 21, 2018

I, the undersigned Vice President of The Hanover Insurance Company, Massachusetts Bay Insurance Company and Citizens Insurance Company of America, hereby certify that the above and foregoing is a full, true and correct copy of the Original Power of Attorney issued by said Companies, and do hereby further certify that the said Powers of Attorney are still in force and effect.

This Certificate may be signed by facsimile under and by authority of the following resolution of the Board of Directors of The Hanover Insurance Company, Massachusetts Bay Insurance Company and Citizens Insurance Company of America.

"RESOLVED, That any and all Powers of Attorney and Certified Copies of such Powers of Attorney and certification in respect thereto, granted and executed by the President or any Vice President in conjunction with any Vice President of the Company, shall be binding on the Company to the same extent as if all signatures therein were manually affixed, even though one or more of any such signatures thereon may be facsimile." (Adopted October 7, 1981 - The Hanover Insurance Company; Adopted April 14, 1982 - Massachusetts Bay Insurance Company; Adopted September 7, 2001 - Citizens Insurance Company of America)

GIVEN under my hand and the seals of said Companies, at Worcester, Massachusetts, this 15th day of December 2015.

THE HANOVER INSURANCE COMPANY
MASSACHUSETTS BAY INSURANCE COMPANY
CITIZENS INSURANCE COMPANY OF AMERICA

J. Michael Pete, Vice President



ATTACHMENT D

Part 451.320(a)(3)

Trident Retail Energy, LLC meets the financial criteria set forth in Part 451.320(a)(3), as demonstrated in the following enclosed documentation:

- Attestation of financial qualifications
- Proof of PJM membership



12/28/2015

RE: Financial Qualifications under Subpart D - Section Part: 451.320(a)(3)

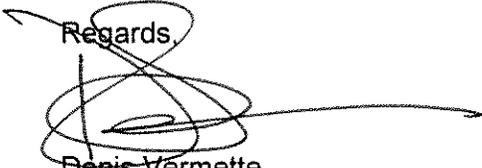
To Whom It May Concern:

I hereby certify that Trident Retail Energy, LLC dba Trident Power meets the financial qualifications under Section 451.320(a)(3).

Trident Retail Energy, LLC is a member of PJM Interconnection LLC and will purchase 100% of its physical electric energy from PJM Interconnection LLC for delivery to the service territory of Commonwealth Edison for which Trident Retail Energy, LLC is seeking a certificate.

For questions, please feel free to contact me any time using the contact information provided below.

Regards,



Denis Vermette
Chief Financial Officer
Trident Retail Energy, LLC dba Trident Power

Mobile: 281-825-2890

Direct: 281-864-1504

dvermette@tridentpower.com



955 Jefferson Ave.
Valley Forge Corporate Center
Norristown, PA 19403-2497

September 10, 2015

Ms. Amy Van Gelder
Trident Retail Energy, LLC
11152 Westheimer, Suite 118,
Houston, TX 77042 USA

Dear Ms. Van Gelder,

Welcome to PJM!

As promised, enclosed are the signed membership agreements for your records. To ensure your needs are met, PJM has assigned Client Manager Leslie Yeager, as your primary point of contact. She can be contacted at leslie.yeager@pjm.com or 610-666-4280. You may also contact our Customer Service Center at 866-400-8980 should you have any questions as well.

Thank you,

A handwritten signature in black ink that reads "Amanda Egan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Amanda Egan
PJM Interconnection

SCHEDULE 4

STANDARD FORM OF AGREEMENT TO BECOME A MEMBER OF THE LLC

Any entity which wishes to become a Member of the LLC shall, pursuant to Section 11.6 of this Agreement, tender to the President an application, upon the acceptance of which it shall execute a supplement to this Agreement in the following form:

Additional Member Agreement

1. This Additional Member Agreement (the 'Supplemental Agreement'), dated as of 8/10/15, is entered into among Trident Retail Energy, LLC and the President of the LLC acting on behalf of its Members.
2. Trident Retail Energy, LLC has demonstrated that it meets all of the qualifications required of a Member to the Operating Agreement. If expansion of the PJM Region is required to integrate Trident Retail Energy, LLC's facilities, a copy of Attachment J from the PJM Tariff marked to show changes in the PJM Region boundaries is attached hereto. Trident Retail Energy, LLC agrees to pay for all required metering, telemetering and hardware and software appropriate for it to become a member.
3. Trident Retail Energy, LLC agrees to be bound by and accepts all the terms of the Operating Agreement as of the above date.
4. Trident Retail Energy, LLC hereby gives notice that the name and address of its initial representative to the Members Committee under the Operating Agreement shall be:

Amy Van Gelder
11152 Westheimer, Suite 118,
Houston, TX 77042 USA

5. The President of the LLC is authorized under the Operating Agreement to execute this Supplemental Agreement on behalf of the Members.
6. The Operating Agreement is hereby amended to include Trident Retail Energy, LLC as a Member of the LLC thereto, effective as of August 10th 2015, the date the President of the LLC countersigned this Agreement.

IN WITNESS WHEREOF, Trident Retail Energy, LLC and the Members of the LLC have caused this Supplemental Agreement to be executed by their duly authorized representatives.

Members of the LLC

By: Amy Van Gelder on behalf of Terry Gaston
Name: ERIN L SCHNEIT
Title: President & CEO

By: [Signature]
Name: Michael D. Osowski
Title: PRESIDENT & C.E.O.

Application for Membership
Between
PJM Interconnection, L.L.C.
and

Trident Retail Energy, LLC

This Application for Membership Agreement ('Agreement') is entered into between PJM Interconnection, L.L.C. ('PJM') and ('Applicant'). The purpose of this Agreement is to apply to become a member of the PJM and to participate under the PJM Amended and Restated Operating Agreement, Third Revised Rates Schedule FERC No. 24 ('Operating Agreement'). The Applicant has read and understands the terms and conditions of the Operating Agreement. The Applicant agrees to accept the concepts and obligations set forth in this Agreement and the Operating Agreement posted on the PJM website at: <http://www.pjm.com/documents/agreements/pjm-agreements.aspx>.

The Applicant also commits to supply data required for coordination of planning and operating, including data for capacity accounting, and agrees to pay all costs and expenses in accordance with the Operating Agreement and all other applicable costs under the PJM Open Access Transmission Tariff ('Tariff'). Such costs include but are not limited to: (i) payment obligations under Schedule 3 of the Operating Agreement; (ii) costs under Schedule 9 of the PJM Tariff; and (iii) potential default allocation payment obligations pursuant to Section 15.2 of the Operating Agreement (PJM may, under the Operating Agreement, declare members in default for not paying their invoices. If that occurs, PJM may pursue collection of the overdue invoices that exceed the collateral PJM holds from the defaulting member as well as take steps to terminate the defaulting members' membership. According to the Operating Agreement, all members are required to pay a portion of the payment default that exceeds the defaulting member's collateral held by PJM.)

The Applicant will pay the annual fee of \$5,000 for the remainder of the year of application upon notification of PJM application approval per Schedule 3.

The Applicant recognizes that it shall become a member of PJM effective as of the date that the Applicant receives the supplement to the Operating Agreement in the form prescribed in Schedule 4 of the Operating Agreement signed by the Applicant and countersigned by the President of PJM pursuant to section 11.6 of the Operating Agreement.

This Agreement will remain in effect until notice of termination is given in writing by the authorized representative of either the Applicant or PJM. Any financial obligations must be satisfied prior to termination of the Applicant's obligations and responsibilities under the PJM Agreement.

Applicant:

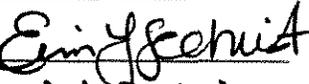
Signature: 

Name: Amy Van Gelder

Title: Chief Operating Officer

Date: 7/23/2015

PJM Interconnection, L.L.C.

Signature: 

Name: Erin L. Schrist

Title: Manager, Member Support Services

Date: 8/10/15



TRIDENT
P O W E R

ATTACHMENT E

Part 451.330

Technical Qualifications



Technical Qualifications - Part 451.330

Per Section 451.330, an applicant shall be deemed to possess sufficient technical capabilities to serve retail customers identified in this Subpart if it has at least one individual on its staff with at least four years of experience buying and selling power and energy in wholesale markets, and one year of scheduling experience working for an entity that is either a member of PJM or 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.

Trident Power's team has two individuals which meet the qualifications as set forth in Part 451.330. See below for specific qualifications per requirement.

Requirement	Individual	Years	
Four years experience buying and selling power and energy in wholesale markets	Michael D. Osowski	8 + years	<p>Mr. Osowski was responsible for power purchasing and hedging decisions at Oasis Energy (10/09-12/12)</p> <p>While at Spark Energy, Mr. Osowski personally handled all power purchasing and hedging decisions during his first three years with the company. (02/03-02/06)</p> <p>Mr. Osowski worked with BP Energy Company during their transition to retail procurement in PJM, including wholesale power purchases. (11/99-11/01)</p>
	Amy Van Gelder	8 + years	<p>Amy Van Gelder was responsible for the company's power purchasing and hedging decisions at Oasis Energy. (01/13-05/15)</p> <p>Amy Van Gelder dealt directly with power purchase pricing and wholesale volumes throughout her tenure at Spark Energy. (09/03-10/09)</p>
One year of scheduling experience working for an entity that is a member of PJM	Michael D. Osowski	4 + years	<p>Mr. Osowski scheduled power at Oasis Energy (10/09-12/12)</p> <p>Mr. Osowski scheduled power during his employment with Green Mountain Energy and BP Energy Company. (11/99-11/01)</p>

Technical Qualifications - Part 451.330

	Amy Van Gelder	9 + years	<p>Mrs. Van Gelder scheduled power for Oasis Energy in several PJM markets as necessary. (10/09-05/15)</p> <p>Mrs. Van Gelder scheduled power during her role as New Markets Director at Spark Energy. (01/06-10/09)</p>
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See below for detailed resumes for the individuals listed above:

Michael D. Osowski, President

Trident Retail Energy, LLC dba Trident Power
President and CEO, 05/15-Present

Responsibilities: Responsibility of overall performance of the company.

- Management and execution of power hedging activities.
- Risk management and supply position oversight.

Oasis Power, LLC dba Oasis Energy
President, 10/09-05/15

Responsibilities: Responsibility of overall performance of the company.

- Management and execution of power hedging activities.
- Supply forecasting, day-ahead purchases and scheduling.
- Risk management and supply position oversight.
- Reporting and compliance activities.
- Compliance of renewable portfolio requirements.

Spark Energy, LP
Senior Executive Vice President, 02/03-10/09

Responsibilities: Overall P&L responsibility of company's electricity business.

- From start-up stage, managed company's growth from 5,000 to over 100,000 electricity customers.
- Led all business units of business operations, including sales and marketing, customer service and billing, systems development, and power supply.
- Led system development efforts and business priorities regarding the company's online enrollment build out which acquired over 50,000 customers.
- Handled all supply and risk management decisions and was responsible for managing hedged positions.

Private Consulting Projects
Managing Director, 11/01-02/03

Responsibilities: Provided wholesale and retail logistics consulting to wholesale and retail energy markets.

- Clients include Proctor & Gamble, AEP Energy.

Green Mountain Energy Company / BP Energy Company
Director – Mid Office Operations, 11/99-11/01

Responsibilities: Lead efforts to transition company from full-service requirements supply to self-managed portfolio.

- Developed and managed capabilities to enable BP Trade Group to structure retail power products with mitigated risk.
- Developed a next-day retail forecasting system with 97% accuracy in the PJM control region.
- Scheduled day-ahead power and capacity in PJM markets.
- Trained and supervised short-term trading and forecasting staff.
- Worked with scheduling and settlement groups to develop operational procedures.
- Worked directly with the OASIS reservation process and the NERC tagging process.

Technical Qualifications - Part 451.330

Green Mountain Energy Company

Director of Commercial & Industrial Power, 06/98-11/99

Responsibilities: Manage retail electric sales in PJM and mid-Atlantic markets

- Development and implementation of operational capabilities to acquire, sell, and deliver power to large commercial and industrial customers in New Jersey, Texas, California, and Ohio.
- Facilitation of multiple wind generation projects.
- Establishment of company's first national marketing program for renewable energy in retail markets.
- Senior dealmaker for long term structured contracts.

ICF Kaiser Incorporated

Industrial Energy Team Lead, 12/95-06/98

Responsibilities: Contribute to growth of U.S. Environmental Protection Agency's ENERGY STAR Buildings Program

- Vertically targeted sales to large commercial, industrial, and municipal organizations.
- Produced marketing segmentation analysis to further market penetration.
- Worked with providers of electric generation and energy services as part of the ENERGY STAR Ally Program, to effectively meet changing customer demands.

Amy Van Gelder, Chief Operating Officer

Trident Retail Energy, LLC dba Trident Power

Chief Operating Officer, 05/15-Present

Responsibilities: Responsibility of the operational and financial performance of the company.

- Develop and maintain company's retail and wholesale pricing models and track against company's hedged positions.
- Supply forecasting, day-ahead purchases and scheduling.
- Reporting and compliance activities.
- Oversight of company's regulatory compliance, including compliance of renewable portfolio requirements.
- Manage all I.T. related activities with outsourced support provider.
- Coordination with Director of Outsourced Sales to develop and enforce regulatory compliance and quality assurance standards.

Oasis Power, LLC dba Oasis Energy

Vice President, 10/09-Present

Responsibilities: Responsibility of overall operations of the company

- Responsible for product pricing
- Developed and maintained company's retail and wholesale pricing models and track against company's hedged positions.
- Managed operations staff, including customer support team and business analysts.
- Oversight of company's regulatory compliance and service-levels.
- Managed all I.T. related activities with outsourced support provider.
- Developed system checks and balances against EDI and billing system vendor (Energy Services Group).
- Coordinated with Director of Outsourced Sales to develop and enforce regulatory compliance and quality assurance standards.

Spark Energy, LP

New Markets Director, 01/06-10/09

Responsibilities: Manage all facets of company's national expansion efforts (outside ERCOT)

- Facilitated regulatory approval process in New York, Massachusetts, and Maryland.
- Assessed market rules and conducted pricing/headroom analysis and to determine market priorities.
- Developed initial scheduling and forecasting models required to manage the company's load on a day-to-day basis.
- Developed customer load profile and pricing models for each market.

Technical Qualifications - Part 451.330

- Introduced and trained supply team on PJM and NYISO scheduling requirements and processes.
- For developed models and tools, coordinated with system software development team to automate and standardize as applicable.
- Evaluated retail sales volumes against hedged positions to determine wholesale power needs.

Spark Energy, LP

Director of Operations, 09/03-12/05

Responsibilities: Manage daily operations of electric business and sales groups

- Developed and managed sales procedures and requirements and analyzed sales performance against projected sales forecasts.
- Established and managed customer support team, billing and transaction team, and contract management.
- Managed staff of system developers (4) and assessed priorities based on company's operational needs and strategic objectives.
- Maintained and improved commercial pricing models for ERCOT wholesale pricing.
- Generated company's supply position and MTM reporting.
- Established and maintained company's management reporting metrics and standards.

Utility Choice Electric

Senior Business Operations Analyst, 10/01-09/03

Responsibilities: Regulatory oversight and operational process development

- Developed and maintained website enrollment capabilities, product contracts and terms of service
- Subject-matter expert on ERCOT transaction processing and protocols.
- Established business processes of entire customer life-cycle, from customer credit assessment and decision-making policies, to paying third-party sales aggregators.
- Evaluated retail sales volumes against hedged positions to determine wholesale power needs.
- Developed third-party commission reporting system and extranet capabilities.



TRIDENT
P O W E R

ATTACHMENT F

Part 451.340

Managerial Qualifications



Managerial Qualifications - Part 451.340

Per Section 451.340, an applicant shall be deemed to possess sufficient managerial capabilities to serve retail customers identified in this Subpart if, in management positions, it has three or more individuals with four or more years of experience with enterprise financial and administration responsibilities including profit and loss responsibilities, three or more individuals with four years of experience buying and selling power and energy in wholesale markets, and three or more individuals with four years electric system operational experience.

Trident Power's team has several individuals which meet the qualifications as set forth in Part 451.340. See below for specific qualifications per requirement.

Requirement	Individual	Years	
<i>Three or more individuals with four or more years of experience with enterprise financial and administration responsibilities including profit and loss responsibilities</i>	Michael D. Osowski	9 + years	As president of Oasis Energy, Mr. Osowski was responsible for the company's overall P&L and operational performance and administration. (10/09-05/15) Mr. Osowski had profit and loss responsibilities as head of all of Spark Energy's electric markets. (02/03-10/09)
	Denis Vermette	6 years	During his duration as Oasis Energy's CFO, Denis Vermette had financial and P&L responsibilities. (09/14-05/15) Mr. Vermette held enterprise financial responsibilities in his role as Global Treasurer at American Bureau of Shipping (ABS). (03/14-09/14) Mr. Vermette had both enterprise financial responsibilities as well as P&L responsibilities in his role as Treasurer and Vice President of Finance and Operations at Spark Energy (01/10-12/12) and his duration as Managing Director at Sequent Energy Management (10/06-01/10).
	Amy Van Gelder	8 years	As Vice President and C.O.O. at Oasis Energy, Amy Van Gelder had enterprise administration and P&L responsibilities. (10/09-05/15). Mrs. Van Gelder had enterprise administration responsibilities as New Market Director during her tenure at Spark Energy. (01/06-10/09).

Managerial Qualifications - Part 451.340

<p><i>Three or more individuals with four years of experience buying and selling power and energy in wholesale markets.</i></p>	<p>Michael D. Osowski</p>	<p>7 + years</p>	<p>Mr. Osowski was responsible for all power purchasing and hedging decisions at Oasis Energy through the end of 2012. (10/09-12/12)</p> <p>While at Spark Energy, Mr. Osowski personally handled all power purchasing and hedging decisions during his first three years with the company. (02/03-02/06)</p> <p>Mr. Osowski worked with BP Energy Company during their transition to retail procurement in PJM, including wholesale power purchases. (11/99-11/01)</p>
	<p>Amy Van Gelder</p>	<p>8 + years</p>	<p>Amy Van Gelder bought and sold energy in both the NYISO and PJM wholesale markets at Oasis Energy. (01/13-05/15).</p> <p>Amy Van Gelder dealt directly with power purchase pricing and wholesale volumes throughout her tenure at Spark Energy. (09/03-10/09)</p>
	<p>Denis Vermette</p>	<p>7 years</p>	<p>Denis Vermette has experience with wholesale power purchasing and hedging decisions from his time at Oasis Energy as CFO. (09/14-05/15)</p> <p>Mr. Vermette has experience with the wholesale markets from his tenures at Sequent Energy Management (10/06-01/10) and Dominion Resources (06/03-10/06)</p>
<p><i>Three or more individuals with four years electric system operational experience.</i></p>	<p>Michael D. Osowski</p>	<p>16 years</p>	<p>Mr. Osowski has extensive experience working for entities that are members of PJM and/or the New York ISO.</p>
	<p>Amy Van Gelder</p>	<p>14 years</p>	<p>Amy Van Gelder has extensive experience working for entities that are members of PJM and/or the New York ISO.</p>
	<p>Denis Vermette</p>	<p>10 years</p>	<p>Denis Vermette has extensive experience working for entities that are members of PJM and/or the New York ISO, and MISO.</p>
	<p>Al Barrios</p>	<p>16 years</p>	<p>Mr. Barrios has extensive experience working for entities that are members of PJM and/or the New York ISO.</p>

See below for detailed resumes for the individuals listed above:

Michael D. Osowski, President

Trident Retail Energy, LLC dba Trident Power
President and CEO, 05/15-Present

Responsibilities: Responsibility of overall performance of the company.

- Management and execution of power hedging activities.
- Risk management and supply position oversight.

Oasis Power, LLC dba Oasis Energy
President, 10/09-05/15

Responsibilities: Responsibility of overall performance of the company.

- Management and execution of power hedging activities.
- Supply forecasting, day-ahead purchases and scheduling.
- Risk management and supply position oversight.
- Reporting and compliance activities.
- Compliance of renewable portfolio requirements.

Spark Energy, LP
Senior Executive Vice President, 02/03-10/09

Responsibilities: Overall P&L responsibility of company's electricity business.

- From start-up stage, managed company's growth from 5,000 to over 100,000 electricity customers.
- Led all business units of business operations, including sales and marketing, customer service and billing, systems development, and power supply.
- Led system development efforts and business priorities regarding the company's online enrollment build out which acquired over 50,000 customers.
- Handled all supply and risk management decisions and was responsible for managing hedged positions.

Private Consulting Projects
Managing Director, 11/01-02/03

Responsibilities: Provided wholesale and retail logistics consulting to wholesale and retail energy markets.

- Clients include Proctor & Gamble, AEP Energy.

Green Mountain Energy Company / BP Energy Company
Director – Mid Office Operations, 11/99-11/01

Responsibilities: Lead efforts to transition company from full-service requirements supply to self-managed portfolio.

- Developed and managed capabilities to enable BP Trade Group to structure retail power products with mitigated risk.
- Developed a next-day retail forecasting system with 97% accuracy in the PJM control region.
- Scheduled day-ahead power and capacity in PJM markets.
- Trained and supervised short-term trading and forecasting staff.
- Worked with scheduling and settlement groups to develop operational procedures.
- Worked directly with the OASIS reservation process and the NERC tagging process.

Green Mountain Energy Company
Director of Commercial & Industrial Power, 06/98-11/99

Responsibilities: Manage retail electric sales in PJM and mid-Atlantic markets

- Development and implementation of operational capabilities to acquire, sell, and deliver power to large commercial and industrial customers in New Jersey, Texas, California, and Ohio.
- Facilitation of multiple wind generation projects.
- Establishment of company's first national marketing program for renewable energy in retail markets.
- Senior dealmaker for long term structured contracts.

ICF Kaiser Incorporated
Industrial Energy Team Lead, 12/95-06/98

Managerial Qualifications - Part 451.340

Responsibilities: Contribute to growth of U.S. Environmental Protection Agency's ENERGY STAR Buildings Program

- Vertically targeted sales to large commercial, industrial, and municipal organizations.
- Produced marketing segmentation analysis to further market penetration.
- Worked with providers of electric generation and energy services as part of the ENERGY STAR Ally Program, to effectively meet changing customer demands.

Amy Van Gelder, Chief Operating Officer

Trident Retail Energy, LLC dba Trident Power

Chief Operating Officer, 05/15-Present

Responsibilities: Responsibility of the operational and financial performance of the company.

- Develop and maintain company's retail and wholesale pricing models and track against company's hedged positions.
- Supply forecasting, day-ahead purchases and scheduling.
- Reporting and compliance activities.
- Oversight of company's regulatory compliance, including compliance of renewable portfolio requirements.
- Manage all I.T. related activities with outsourced support provider.
- Coordination with Director of Outsourced Sales to develop and enforce regulatory compliance and quality assurance standards.

Oasis Power, LLC dba Oasis Energy

Vice President, 10/09-05/15

Responsibilities: Responsibility of overall operations of the company

- Responsible for product pricing
- Developed and maintained company's retail and wholesale pricing models and track against company's hedged positions.
- Managed operations staff, including customer support team and business analysts.
- Oversight of company's regulatory compliance and service-levels.
- Managed all I.T. related activities with outsourced support provider.
- Developed system checks and balances against EDI and billing system vendor (Energy Services Group).
- Coordinated with Director of Outsourced Sales to develop and enforce regulatory compliance and quality assurance standards.

Spark Energy, LP

New Markets Director, 01/06-10/09

Responsibilities: Manage all facets of company's national expansion efforts (outside ERCOT)

- Facilitated regulatory approval process in New York, Massachusetts, and Maryland.
- Assessed market rules and conducted pricing/headroom analysis and to determine market priorities.
- Developed initial scheduling and forecasting models required to manage the company's load on a day-to-day basis.
- Developed customer load profile and pricing models for each market.
- Introduced and trained supply team on PJM and NYISO scheduling requirements and processes.
- For developed models and tools, coordinated with system software development team to automate and standardize as applicable.
- Evaluated retail sales volumes against hedged positions to determine wholesale power needs.

Spark Energy, LP

Director of Operations, 09/03-12/05

Responsibilities: Manage daily operations of electric business and sales groups

- Developed and managed sales procedures and requirements and analyzed sales performance against projected sales forecasts.
- Established and managed customer support team, billing and transaction team, and contract management.

Managerial Qualifications - Part 451.340

- Managed staff of system developers (4) and assessed priorities based on company's operational needs and strategic objectives.
- Maintained and improved commercial pricing models for ERCOT wholesale pricing.
- Generated company's supply position and MTM reporting.
- Established and maintained company's management reporting metrics and standards.

Utility Choice Electric

Senior Business Operations Analyst, 10/01-09/03

Responsibilities: Regulatory oversight and operational process development

- Developed and maintained website enrollment capabilities, product contracts and terms of service
- Subject-matter expert on ERCOT transaction processing and protocols.
- Established business processes of entire customer life-cycle, from customer credit assessment and decision-making policies, to paying third-party sales aggregators.
- Evaluated retail sales volumes against hedged positions to determine wholesale power needs.
- Developed third-party commission reporting system and extranet capabilities.

Denis Vermette, Chief Financial Officer

Trident Retail Energy, LLC dba Trident Power

Chief Financial Officer, 05/15-Present

Responsibilities: Management of the company's finance, risk, and credit related operations.

As C.F.O. of Trident Power, Mr. Vermette is responsible for the overall day-to-day accounting, treasury, cash management, forecasting and financial reporting of the company's operations. He has worked in the retail energy for four years and wholesale energy for 15+ years. Mr. Vermette was the President of the International Credit Association (IECA) in 2008 and 2009 and has held various board positions with this organization through 2013.

Oasis Power, LLC dba Oasis Energy

Chief Financial Officer, 09/14-05/15

Responsibilities: Management of the company's finance, risk, and credit related operations.

- Maintained and track company's financial and operational forecasts.
- Managed commercial banking relationships and supervises the company's investment funds.
- Negotiated company's credit agreements and amendments.
- Worked in conjunction with President and C.O.O. in wholesale power purchasing and hedging decisions.

American Bureau of Shipping (ABS)

Global Treasurer, 03/14-09/14

Responsibilities: Managed team of treasury managers with oversight of cash management, portfolio management and treasury operations.

- Oversight of a \$1.4 billion pension and investment portfolios. Worked closely with each investment manager and custodian bank. Prepared and administered investment reporting for Investment, Pension and Finance committees.
- Responsible for the management of approximately 350 bank accounts in over 70 countries. Lead the selection process of a global Treasury Management System (TMS). Maintained and enhanced global cash forecast model.
- Managed three L/C facilities and assisted Finance Managers with the issuance of bid and performance bonds. Oversight of the company's \$100 million revolving credit facility and ensured bank covenants were met.
- Responsible for the company's internal controls. Monitored and audited investment portfolio controls to ensure investment managers were compliant with the Investment Policy Statement.

Argenteus Solutions

Managing Director/Owner, 01/13-09/14

Managerial Qualifications - Part 451.340

Responsibilities: Provided ongoing financial and operational consulting services to the leadership of Spark Energy Ventures group of companies. Developed 2014 business plan and budget.

Spark Energy, LP

Vice President - Finance, Operations and Treasurer, 01/10-12/12

Responsibilities: Led a large team of personnel from several departments: treasury, financial planning and analysis, credit risk, business operations and call center operations.

- Managed all aspects of treasury, including cash flow, banking relationships, credit facilities and borrowing strategies, compliance with all debt covenants and collateral reporting. Reduced banking fees by 18% annually by completing an RFP for treasury services and implemented two additional banking relations.
- Oversaw annual, quarterly and monthly budgets, recommending corrective action as needed. Developed and implemented a short-term cash forecast model that identified possible cash needs three months in advance.
- Developed a strategy for accounts receivable and collections which resulted in bad debt being reduced to 0.78% in 2011 and 1.38% in 2012, from an average of 3.4% in 2010.
- Managed a \$35 million budget and reduced OPEX by over \$6.6 million, through cost cutting, improving processes and increasing efficiency. Developed winning teams and provided mentoring and coaching for day-to-day operations.
- Merged three independent call centers into one and saved the company \$1 million through process improvements, synergies between disciplines and reducing staff. Also improved service and occupancy levels to more than 75%.

Sequent Energy Management

Managing Director - Credit, Contracts and Compliance, 10/06-01/10

Responsibilities: Managed a \$3.5 billion energy risk portfolio of natural gas, fuel oil, producer services and retail relations. Supplied cross-functional management to the Contracts, Credit, and Compliance departments.

- Oversaw monthly reporting, compliance with corporate policies, and portfolio and credit quality.
- Developed an online data warehouse of noncompliant transactions, allowing for easy data retrieval, real-time reporting and increased efficiencies.
- Developed and implemented an online contract and credit request form using Microsoft InfoPath, feeding into a real-time data log using SharePoint, resulting in increased efficiency and tracking.
- Implemented a counterparty credit underwriting and archiving system. Streamlined the review process to improve continuity and financial reliance on analysis.

Dominion Resources, Inc.

Director, Portfolio Risk Management, 06/03-10/06

Responsibilities: Managed a \$4.0 billion energy risk portfolio of power, natural gas, crude oil, coal, producer services, and retail aggregation and emission relations. Led a team of credit, contract and quantitative professionals.

Ameren Corporation, Inc.

Director of Credit, 09/99-06/03

Al Barrios, Chief Marketing Officer

Trident Retail Energy, LLC dba Trident Power

Chief Marketing Officer, 05/15-Present

Responsibilities: Management of the company's origination and customer operations.

As Chief Marketing Officer, Mr. Barrios is responsible for the company's origination, as well the management of all operational facets of the customer life-cycle. Mr. Barrios has extensive professional experience in retail energy operations and has expertise in information technology, customer interaction centers, contract management, marketing, billing/transaction management, and customer retention management and analysis.

Managerial Qualifications - Part 451.340

Oasis Power, LLC dba Oasis Energy

Vice President of Operations, 08/14-05/15

Responsibilities: Responsible for operational efficiencies of the company.

- Management and improvement of customer operations.
- Enhanced processes to improve customer experience.
- Enhanced processes to improve customer experience.
- Rates and pricing execution and implementation.
- Implemented company acquisition programs with both internal and external stakeholders.

Electric Now, LLC

C.O.O., 08/14-05/15

Responsibilities: Responsible for overall performance of the company.

- Responsible for P&L of pre-paid electricity book of customers
- Negotiated and managed outsourced sales vendor relationships
- Managed company's technology platform, including front-end website and back office billing systems

Spark Energy, LLC

Senior Vice President, 07/05-12/10

Responsibilities: Responsible for customer-side operations of company

- Led operational teams managing over 100,000 retail energy and gas customers
- Developed new procedures to support new business development initiatives within the ERCOT market, northeast power markets, and mid-west gas markets.

Reliant Energy

Operations Manager, 01/99-06/05

Responsibilities: Managed staff and responsible for billing customer support group

- Served as coach of individual customer support and billing personnel
- Hiring decision-maker for staffing needs of billing department
- Established and reported the department's key performance metrics
- Worked with system consultants in mapping out operational process flows for system development purposes



TRIDENT
P O W E R

ATTACHMENT G

Part 451.340(b)

Organizational Chart

ATTACHMENT G

**TRIDENT RETAIL ENERGY, LLC dba TRIDENT POWER
ORGANIZATIONAL CHART
Part 451.340(b)**

