



Ayo Ekisola  
Regulatory Licensing & Reporting  
Titan Gas, LLC DBA CleanSky Energy  
346-327-3128  
[aekisola@cleanskyenergy.com](mailto:aekisola@cleanskyenergy.com)

January 3, 2022

Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit St.,  
Suite 10  
Concord, NH 03301

**RE: Competitive Electric Power Supplier Registration for Titan Gas LLC dba CleanSky Energy ("CleanSky Energy")**

Dear sir/madam,

We hereby apply for the initial registration as a competitive electric power supplier (CEPS) in New Hampshire.

CleanSky Energy requests confidential treatment of our financial statement marked as confidential Exhibit FS. We consider this information to be confidential as the revelation of the information would cause substantial competitive harm to our business and we would like to maintain this confidential information from being used to our competitive disadvantage.

Should you have any questions regarding this submission, or require additional information, please contact me at 346-327-3128

Sincerely,

A handwritten signature in black ink, appearing to read "Ayo Ekisola", written over a white background.

Ayo Ekisola

Manager, Compliance and Regulatory Affairs

Enclosure



### Competitive Electric Power Supplier Application Form

This form may be used to: (1) apply for initial registration as a competitive electric power supplier (CEPS) in New Hampshire, (2) apply for renewal of registration as a CEPS in New Hampshire, and (3) notify the Commission of any changes to information in a previously filed CEPS application. *This form is provided as a convenience for filing only; you are required to provide all information specified under Puc 2006.01 when applying for initial or renewal registration as a CEPS, but you are not required to use this form when doing so.*

Indicate whether this application is for an initial registration or for a renewal. Initial <input checked="" type="checkbox"/> Renewal <input type="checkbox"/>																															
Applicant's General Information																															
Puc 2006.01(a)	<table border="1"> <tr> <td>Legal Name</td> <td>Titan Gas, LLC</td> </tr> <tr> <td>Trade Name (d/b/a) (if applicable)</td> <td>CleanSky Energy</td> </tr> </table>	Legal Name	Titan Gas, LLC	Trade Name (d/b/a) (if applicable)	CleanSky Energy																										
Legal Name	Titan Gas, LLC																														
Trade Name (d/b/a) (if applicable)	CleanSky Energy																														
Puc 2006.01(b)	<table border="1"> <tr> <td>Business Mailing Address</td> <td>3355 West Alabama St., Suite 500 Houston, TX 77098</td> </tr> <tr> <td>Telephone Number</td> <td>888-355-6205</td> </tr> <tr> <td>E-Mail Address</td> <td>customer@cleanskyenergy.com</td> </tr> <tr> <td>Website Address</td> <td>www.cleanskyenergy.com</td> </tr> </table>	Business Mailing Address	3355 West Alabama St., Suite 500 Houston, TX 77098	Telephone Number	888-355-6205	E-Mail Address	customer@cleanskyenergy.com	Website Address	www.cleanskyenergy.com																						
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Puc 2006.01(c)	<table border="1"> <tr> <td>Provide the state or jurisdiction of organization, if anything other than an individual.</td> <td>TEXAS</td> </tr> </table>	Provide the state or jurisdiction of organization, if anything other than an individual.	TEXAS																												
Provide the state or jurisdiction of organization, if anything other than an individual.	TEXAS																														
Puc 2006.01(d)	<p>Provide the name(s), title(s), business address(es), telephone number(s), and e-mail address(es) of the applicant if an individual, or of the applicant's principal(s)<sup>1</sup> if it is anything other than an individual. Use additional sheets as needed.</p> <table border="1"> <tr> <td>Name</td> <td>Alan Biney</td> </tr> <tr> <td>Title</td> <td>President and CEO</td> </tr> <tr> <td>Business Mailing Address</td> <td>3355 WEST ALABAMA ST., SUITE 500 Houston, TX 77098</td> </tr> <tr> <td>Telephone Number</td> <td>346-327-3100</td> </tr> <tr> <td>E-Mail Address</td> <td>abiney@cleanskyenergy.com</td> </tr> <tr> <td>Name</td> <td>John Lupo</td> </tr> <tr> <td>Title</td> <td>Chief Accounting Officer</td> </tr> <tr> <td>Business Mailing Address</td> <td>3355 WEST ALABAMA ST., SUITE 500 Houston, TX 77098</td> </tr> <tr> <td>Telephone Number</td> <td>346-327-3104</td> </tr> <tr> <td>Email Address</td> <td>jlupo@cleanskyenergy.com</td> </tr> <tr> <td>Name</td> <td>Yara Abdur-Rahman</td> </tr> <tr> <td>Title</td> <td>Chief Operations Officer</td> </tr> <tr> <td>Business Mailing Address</td> <td>3355 WEST ALABAMA ST., SUITE 500 Houston, TX 77098</td> </tr> <tr> <td>Telephone Number</td> <td>346-327-3106</td> </tr> <tr> <td>E-Mail Address</td> <td>yrahman@cleanskyenergy.com</td> </tr> </table>	Name	Alan Biney	Title	President and CEO	Business Mailing Address	3355 WEST ALABAMA ST., SUITE 500 Houston, TX 77098	Telephone Number	346-327-3100	E-Mail Address	abiney@cleanskyenergy.com	Name	John Lupo	Title	Chief Accounting Officer	Business Mailing Address	3355 WEST ALABAMA ST., SUITE 500 Houston, TX 77098	Telephone Number	346-327-3104	Email Address	jlupo@cleanskyenergy.com	Name	Yara Abdur-Rahman	Title	Chief Operations Officer	Business Mailing Address	3355 WEST ALABAMA ST., SUITE 500 Houston, TX 77098	Telephone Number	346-327-3106	E-Mail Address	yrahman@cleanskyenergy.com
Name	Alan Biney																														
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<sup>1</sup> "Principals" means, for a corporation, any of its officers, directors, or controlling shareholders, for a limited liability company, any of its managers or controlling members, for a partnership, any of its general partners, and for any other business entity, any of its personnel exercising executive functions and any of its controlling equity owners.



<b>Affiliates and Subsidiaries</b>							
Puc 2006.01(e)	Provide the following information regarding any affiliates <sup>2</sup> and subsidiaries of the applicant that are conducting business in New Hampshire. Use additional sheets as needed.						
	<table border="1" style="width: 100%;"> <tr> <td style="width: 30%;">Name of Entity</td> <td>NOT APPLICABLE</td> </tr> <tr> <td>Business Address</td> <td></td> </tr> <tr> <td>Telephone Number</td> <td style="text-align: center;">- -</td> </tr> </table>	Name of Entity	NOT APPLICABLE	Business Address		Telephone Number	- -
	Name of Entity	NOT APPLICABLE					
	Business Address						
	Telephone Number	- -					
	Provide a description of the business purpose of the entity.						
	Provide a description of any agreements with any affiliated New Hampshire utility, and the docket number relative to the filing of any such agreements with the Commission.						
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	Business Address						
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Provide a description of any agreements with any affiliated New Hampshire utility, and the docket number relative to the filing of any such agreements with the Commission.							

<sup>2</sup> "Affiliate" means any of the following:

- (a) Any person or entity that directly or indirectly owns, controls, or holds with power to vote a majority of the outstanding voting securities or such minority thereof as to give such person substantial control of another person or entity;
- (b) Any person or entity that is directly or indirectly owned, controlled, or held by any person or entity described in (a) above through either power to vote a majority of the outstanding voting securities or such a minority so as to maintain substantial control of such person or entity;
- (c) Any person or entity with which another person or entity has a management or service contract or arrangement that provides such person or entity with effective control over the management, supervision, or operation of the other person or entity; or
- (d) Any person or entity who or which actually exercises effective control over the management, supervision, or operation of another person or entity.



Customer Service Department Contact		
Puc 2006.01(f)	Name	Audrey Estrada
	Title	Manager, Customer support
	Toll-Free Telephone Number (if available)	888-355-6205
	Telephone Number	346-327-3113
	E-Mail Address	customer@cleanskyenergy.com ; aestrada@cleanskyenergy.com

Customer Complaints Contact		
Puc 2006.01(g)(1)	Name	Angela Richardson
	Title	Supervisor, Customer support
	Business Mailing Address	3355 WEST ALABAMA ST., SUITE 500
		Houston, TX 77098
	Telephone Number	346-327-3112
E-Mail Address	customerconcerns@cleanskyenergy.com	

Regulatory Compliance Matters Contact		
Puc 2006.01(g)(2)	Name	Ayo Ekisola
	Title	Manager, Regulatory Affairs and Compliance
	Business Mailing Address	3355 WEST ALABAMA ST., SUITE 500
		Houston, TX 77098
	Telephone Number	346-327-3128
E-Mail Address	aekisola@cleanskyenergy.com	

Commission Assessment Payments Contact		
Puc 2006.01(g)(3)	Name	John Lupo
	Title	Chief Accounting Officer
	Business Mailing Address	3355 WEST ALABAMA ST., SUITE 500
		Houston, TX 77098
	Telephone Number	346-327-3104
E-Mail Address	acctspayable@cleanskyenergy.com	



**Separate Attachments: Business Authority, Trade Name, ISO-NE Market Participation, and EDI Certification**

Puc 2006.01(h)	Provide, as a separate attachment, evidence of the applicant's authorization to do business in New Hampshire from the New Hampshire secretary of state by submitting, with this application form, either of the following:  (1) a recent printout of the applicant's listing on the N.H. Secretary of State website with the status "In Good Standing" or words of similar import; or  (2) a copy of a certificate from the N.H. Secretary of State's office stating that the applicant is authorized to do business in New Hampshire.
Puc 2006.01(i)	Provide, as a separate attachment, evidence of the applicant's registration of the trade name, if any, to be used by the applicant in New Hampshire from the New Hampshire secretary of state by submitting, with this application form, either of the following: (1) A recent printout of the applicant's trade name on the N.H. Secretary of State website with the status "Active" and indicating that the trade name is owned by the applicant; or (2) A copy of a certificate from the N.H. Secretary of State's office indicating that the applicant has registered as doing business under the trade name.
Puc 2006.01(j)	Provide, as a separate attachment, evidence of the applicant's ISO New England market participant membership.
Puc 2006.01(k)	Provide, as a separate attachment, electronic data interchange (EDI) certification from each electric distribution utility in whose franchise area the applicant intends to operate.

**Franchise Areas, Customer Types to be Served, and Other States**

Puc 2006.01(l)	List the utility franchise areas in which the applicant intends to operate and, to the extent the applicant does not intend to provide service in the entire franchise area of a utility, a delineation of the cities and towns where the applicant intends to provide service within each utility franchise area.  GRANITE STATE ELECTRIC COMPANY, NEW HAMPSHIRE ELECTRIC COOPERATIVE, PUBLIC SERVICE COMAPNAY OF NEW HAMPSHIRE, UNITIL ENERGYSYSTEMS
Puc 2006.01(m)	Provide a statement whether or not the applicant intends to serve the following types of customers: residential, small commercial, large commercial, and industrial.  EXHIBIT <u>  D  </u>
Puc 2006.01(n)	List the other states or jurisdictions in which the applicant currently conducts business relating to the sale of electricity.  EXHIBIT <u>  E  </u>



**Customer Complaints**

Puc 2006.01(o) Use either the table below or a separate attachment to provide a list disclosing the number and type of customer complaints concerning the applicant or its principals and affiliates filed with or by any commission or regulatory agency, attorney general's office, or other governmental consumer protection regulatory authority, for the most recent 2 calendar years in every state or other jurisdiction in which the applicant has conducted business relating to the sale of electricity.

In the table below, enter abbreviations of applicable states or the jurisdiction across the top row, complaint types in the left column, and, for each cell in the table, the number of complaints for each type within the applicable state or jurisdiction.

Complaint Type	(enter applicable states/jurisdictions in row just below)										Total	
	IL	MA	MD	NJ	OH	PA	TX					
ACH PAYMENT UPDATE							1					1
CANCELLATION REQUEST			3		4	5						9
MISLEADING SALES PRACTICES		3	9	2	5	4						23
SLAMMING	1	17	28	7	32	65						150
RENEWAL NOTICES NOTRECEIVED					9	2						11
DO NOT CONTACT LIST (DNC)		1	2		3	12						15
BILLING DISPUTE		1	6	2	45	109						54
ENROLLMENT DISPUTE						1	1					2
COLLECTION DISPUTE					2							2
												0
												0
<b>Total</b>	<b>1</b>	<b>2</b>	<b>8</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>17</b>	



<b>Statements Regarding Applicant and its Principals</b>		
Respond to each of the following questions with either "Yes" or "No."		
Puc 2006.01(p)(1)	Has applicant or any of its principals ever been convicted of any felony that has not been annulled by a court?	NO
Puc 2006.01(p)(2)	Has applicant or any of its principals, within the 10 years immediately prior to application, had any civil, criminal, or regulatory sanctions or penalties imposed against it, him, or her pursuant to any state or federal consumer protection law or regulation?	NO
Puc 2006.01(p)(3)	Has applicant or any of its principals, within the 10 years immediately prior to application, settled any civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation?	NO
Puc 2006.01(p)(4)	Is applicant or any of its principals currently the subject of any pending civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation?	NO
Puc 2006.01(p)(5)	Has applicant or any of its principals been denied authorization to provide competitive electricity supply service or electric aggregation service in any other state or jurisdiction?	NO
Puc 2006.01(q)	If an affirmative answer is provided to any item above, then provide a detailed explanation of the occurrence and the related circumstances. Use additional sheets as needed.  NOT APPLICABLE	

<b>Telemarketing</b>		
Puc 2006.01(s)	Does the applicant intend to telemarket? Respond with either "Yes" or "No."	YES
If the response to the question above is "Yes," then respond to the following three questions:		
Puc 2006.01(r)(1)	Will the applicant maintain a list of customers who request being placed on the applicant's do-no-call list for the purposes of telemarketing?	YES
Puc 2006.01(r)(2)	Will the applicant obtain monthly updated do-no-call lists from the National Do Not Call Registry?	YES
Puc 2006.01(r)(3)	Will the applicant NOT initiate calls to New Hampshire customers who have either requested being placed on the applicant's do-not-call list(s) or who are listed on the National Do Not Call Registry?	YES

<b>In-Person Solicitation of Residential Customers</b>		
Puc 2006.01(u)	Does the applicant intend to enroll residential customers through in-person solicitation at the customer's residence? Respond with either "Yes" or "No."	YES
If the response to the question above is "Yes," then provide the following items as separate attachments:		
Puc 2006.01(t)(1)	A plan for in-person solicitation of residential customers at their residences, including provisions to ensure legal and regulatory compliance and quality assurance.	
Puc 2006.01(t)(2)	A description of the applicant's training program for employees or representatives who will conduct in-person solicitation of residential customers at their residences.	
Puc 2006.01(t)(3)	An identification of any third party vendor or vendors the applicant intends to use to conduct in-person solicitation of residential customers at their residences.	
Puc 2006.01(t)(4)	A copy of the applicant's performance standards and code of conduct for any employees, representatives, or vendors who or which will conduct in-person solicitation of residential customers at their residences.	
Puc 2006.01(t)(5)	A copy of field audit standards used to evaluate the performance of employees, representatives, or vendors who or which will conduct in-person solicitation of residential customers at their residences.	



Sample Bill Form		
Puc 2006.01(v)	Does the applicant intend to use only the utility's billing service? Respond with either "Yes" or "No."	YES
Puc 2006.01(v)	If the response to the question above is "No," then provide a sample of the bill form(s) the applicant intends to use as a separate attachment.	

Residential and Small Commercial Customer Contracts		
Puc 2006.01(w)	Does the applicant intend to serve residential and small commercial customers? Respond with either "Yes" or "No."	YES
If the response to the question above is "Yes," then provide the following item as a separate attachment:		
Puc 2006.01(w)	A copy of each contract to be used for residential customers and for small commercial customers, including any schedules or other documentation attached to, incorporated into, or referenced in such contract.	

File Financial Security Instrument		
Refer to Puc 2003.03 for the financial security requirements.		
Puc 2003.01(b)(2)	Provide an original executed financial security instrument that meets the requirements of Puc 2003.03.	
File the original, executed financial security instrument with the Executive Director. The financial security instrument can be filed separately from the application form, by U.S. mail, overnight express, or hand delivery.		

Submit Application Fee (For Initial Applications Only)		
Puc 2003.01(b)(3)	For an application for initial registration, submit payment of the application fee in the amount of \$250.00 to the Executive Director by U.S. mail, overnight express, or hand delivery. Make check payable to: New Hampshire Public Utilities Commission.	
Note that there is no fee for a renewal application.		

Expected Marketing Start Date		
Puc 2006.01(x)	Provide the date upon which the applicant expects to commence marketing its services to customers in New Hampshire.	01/03/2022 Date

Attestation and Signature		
Puc 2006.01(y) and (z)	<p>BY SIGNING BELOW, THE APPLICANT REPRESENTATIVE CERTIFIES THAT IT HAS THE AUTHORITY TO FILE THE APPLICATION ON BEHALF OF THE CEPS AND ATTESTS THAT THE CONTENTS OF THE APPLICATION ARE TRUTHFUL, ACCURATE, AND COMPLETE.</p>  <p>Signature of the applicant or its authorized representative</p> <p>Name: YARA ABDUR-RAHMAN</p> <p>Title: CHIEF OPERATIONS OFFICER</p>	<p>12/15/21 Date</p>

Filing Instructions		
<p>1) Mail an original and two paper copies of this form and all separate attachments to:            Executive Director, NHPUC, 21 South Fruit St., Suite 10, Concord, NH 03301</p> <p>2) E-mail a PDF of this form and all separate attachments to:  <a href="mailto:Executive.Director@puc.nh.gov">Executive.Director@puc.nh.gov</a></p>		





**Titan Gas, LLC DBA CleanSky Energy**

**Exhibit     A**

---

CleanSky Energy Evidence of authorization to do business in New Hampshire

# State of New Hampshire

## Department of State

### CERTIFICATE

I, William M. Gardner, Secretary of State of the State of New Hampshire, do hereby certify that TITAN GAS, LLC is a Texas Limited Liability Company registered to transact business in New Hampshire on November 09, 2021. I further certify that all fees and documents required by the Secretary of State's office have been received and is in good standing as far as this office is concerned.

Business ID: **885161**

Certificate Number : **0005465561**



IN TESTIMONY WHEREOF,

I hereto set my hand and cause to be affixed  
the Seal of the State of New Hampshire,  
this 9th day of November A.D. 2021.

A handwritten signature in cursive script, appearing to read "William M. Gardner".

William M. Gardner  
Secretary of State

# State of New Hampshire

## Department of State

CERTIFICATE OF EXISTENCE  
OF  
TITAN GAS, LLC

This is to certify that **TITAN GAS, LLC** is registered in this office as a **Texas Limited Liability Company** to transact business in New Hampshire on 11/9/2021 12:06:48 PM.

Business ID: **885161**



IN TESTIMONY WHEREOF,  
I hereto set my hand and cause to be affixed  
the Seal of the State of New Hampshire,  
this 9th day of November A.D. 2021

A handwritten signature in cursive script, appearing to read "William M. Gardner".

William M. Gardner  
Secretary of State

# Search Business Names

[← Back to Home \(/online/BusinessInquire\)](#)

## Search Result

Business Name	Business ID	Homestate Name	Previous Name	Business Type	Principal Office Address	Registered Agent Name	Status
TITAN GAS, LLC (/online/BusinessInquire/BusinessInformation? businessID=720168)	885161	TITAN GAS, LLC		Foreign Limited Liability Company	3355 W. ALABAMA ST., Suite 500, Houston, TX, 77098, USA	INCORP SERVICES, INC.	Good Standing

Page 1 of 1, records 1 to 1 of 1

[Back](#)

NH Department of State, 107 North Main St. Room 204, Concord, NH 03301 -- [Contact Us \(/online/Home/ContactUS\)](#)

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**Titan Gas, LLC DBA CleanSky Energy**

**Exhibit     B**

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CleanSky Energy Evidence of registration of Trade name in New Hampshire

# State of New Hampshire

## Department of State

### CERTIFICATE

I, William M. Gardner, Secretary of State of the State of New Hampshire, do hereby certify that CLEANSKY ENERGY is a New Hampshire Trade Name registered to transact business in New Hampshire on November 09, 2021. I further certify that all fees and documents required by the Secretary of State's office have been received and is in good standing as far as this office is concerned.

Business ID: **885552**

Certificate Number : **0005466199**



IN TESTIMONY WHEREOF,

I hereto set my hand and cause to be affixed  
the Seal of the State of New Hampshire,  
this 9th day of November A.D. 2021.

A handwritten signature in cursive script, appearing to read "William M. Gardner".

William M. Gardner  
Secretary of State

## Search Business Names

 [Back to Home \(/online/BusinessInquire\)](/online/BusinessInquire)

## Search Result

Business Name	Business ID	Homestate Name	Previous Name	Business Type	Principal Office Address	Registered Agent Name	Status
CLEANSKY ENERGY (/online/BusinessInquire/BusinessInformation? businessID=720559)	885552			Trade Name	3355 West Alabama St., Suite 500, Houston, TX, 77098, USA	N/A	Active

Page 1 of 1, records 1 to 1 of 1

[Back](#)NH Department of State, 107 North Main St. Room 204, Concord, NH 03301 -- [Contact Us \(/online/Home/ContactUS\)](#)

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**Titan Gas, LLC DBA Titan Gas and Power DBA CleanSky Energy**

Exhibit     C    

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ISO New England Market Participant Membership





SEARCH

CALENDAR

LIBRARY

CONTACT US

SIGN UP

SIGN IN

About Us

Participate

Committees and Groups

System Planning

Markets and Operations

Participate > Participant and Asset Listings

# Participant Directory

Search the directory for details on and contact information for the entities registered with ISO New England, as well as on the committees and subgroups advising the ISO. For example, you can find:

- Each participant's name, address, stock symbol(s), industry sector, industry type/classification, committee membership, and NEPOOL voting status (if the participant is a member of the New England Power Pool)
- Committee and subcommittee or working group names, member lists, and the company association of members
- Download a CSV file of the Participant Directory

As you type you will be offered suggested results. Use your keyboard arrows or mouse to navigate the results.

## Company Details: Titan Gas, LLC

3355 W. Alabama Suite 500  
Houston, TX 77098

### Customer Details

CUSTOMER ID	SECTOR	TYPE	CLASSIFICATION	SUB-CLASSIFICATION	VOTING STATUS
128204	Supplier	Participant	Market Participant		Y

### Committee Members

COMMITTEE NAME	MEMBER NAME	TITLE	POSITION	ROLE
NEPOOL Markets Committee	Mark Depew		Member	Alternate
NEPOOL Markets Committee	Rob Moss	EVP-CCAO	Member	Member
NEPOOL Participants Committee	Mark Depew		Member	Alternate

COMMITTEE NAME	MEMBER NAME	TITLE	POSITION	ROLE
NEPOOL Participants Committee	Rob Moss	EVP-CCAO	Member	Member
NEPOOL Reliability Committee	Rob Moss	EVP-CCAO	Member	Member
NEPOOL Reliability Committee	Mark Depew		Member	Alternate
NEPOOL Transmission Committee	Rob Moss	EVP-CCAO	Member	Member
NEPOOL Transmission Committee	Mark Depew		Member	Alternate

### Participant Related Persons

A Participant and its Related Persons (as defined in the Participants Agreement and Second Restated NEPOOL Agreement) are together entitled to join any one Sector and to have one vote in that Sector.

#### Votes for this company are cast by:

Self

#### This company also votes on behalf of:

None

### Updating the Directory

Help keep the directory current — its accuracy is dependent on data in the ISO's Customer and Asset Management System (CAMS). To update data for your organization or committee, see:

- User guides for CAMS
- CAMS FAQs

### Problems?

Contact Participant Support and Solutions if you are having trouble with the directory.

#### APPLICATIONS

GADS Reporting

IRTT

ISO Express

Ask ISO

#### MARKETS AND OPERATIONS FORECASTING

Morning Report

Seven-Day Forecast

Three-Day Forecast

Power System Status



#### ABOUT US

News and Media

Careers

Legal and Privacy

Environmental Commitment

#### PARTICIPANT SUPPORT

Contact Us

Training



**Titan Gas, LLC DBA CleanSky Energy**

Exhibit      

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CleanSky Energy intends to serve the following types of customers in New Hampshire:

1. Residential
2. Small Commercial
3. Large Commercial
4. Industrial



**Titan Gas, LLC DBA CleanSky Energy**

Exhibit E

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CleanSky Energy currently operates a licensed supplier in the attached states and jurisdictions where we conduct business relating to the sale of electricity and gas respectively.

List of States/Jurisdiction Cleansky Energy presently doing business Exhibit

E

State: IL	Status: Active	Type of License: Electricity	License No: 18-1266	Date Issued: 06/18/2018
State: DC	Status: Active	Type of License: Electricity	License No: EA 2017-15	Date Issued: 11/03/2017
State: TX	Status: Active	Type of License: Electricity	License No: 10268	Date Issued: 11/7/2019
State: PA	Status: Active	Type of License: Electricity	License No: A-2016-2530633	Date Issued: 02/16/2016
State: MD	Status: Active	Type of License: Electricity	License No: A-2008-2054272	Date Issued: 08/01/2008
State: MA	Status: Active	Type of License: Electricity	License No: IR-4126	Date Issued: 10/10/2018
State: NJ	Status: Active	Type of License: Electricity	License No: IR-4127	Date Issued: 10/10/2018
State: NY	Status: Active	Type of License: Gas	License No: CS-177	Date Issued: 05/07/2018
State: OH	Status: Active	Type of License: Gas	License No: ESL-0255	Date Issued: 12/01/2021
	Status: Inactive	Type of License: Gas	License No: GSL 0223	Date Issued: 12/01/2021
	Status: Active	Type of License: Electricity	License No:	Date Issued: 07/25/2006
	Status: Active	Type of License: Gas	License No: Cert-0001352	Date Issued: 06/16/2013
	Status: Active	Type of License: Gas	License No: Cert-0002093	Date Issued: 12/20/2015



**Titan Gas, LLC DBA CleanSky Energy**

Exhibit F

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CleanSky Energy copy our code of conduct and privacy policy



## **Northeast Market Compliance Training Manual**

### **Table of Contents:**

- 1. Basic Industry Compliance Terminology**
- 2. Laws and Regulations Governing Marketing, Sales and Consumer Protection**
- 3. State Specific Prior Notice of Marketing Requirements**
- 4. CleanSky Energy Code of Conduct**
- 5. Customer Confidentiality Policy**
- 6. After an Enrollment Authorization**
- 7. Complaints and Investigation**

## Basic Industry Compliance Terms

### **Administrative Code**

A compilation of regulations passed by a regulatory body, such as a Public Utility/Service Commission.

### **Assistance Program**

Aid offered by the utility company or other entity to assist qualifying customers in paying or reducing their utility bills based on income and other factors. In some states, a customer who is on a payment assistance program is ineligible to switch to an energy supplier.

### **Curfew**

A regulation dictating the time frame during which one is not permitted to conduct telemarketing or door-to-door marketing activities in a State, City or Territory. CleanSky Energy always follows the stricter limitations of any given area.

### **Distribution Service**

Is the physical delivery of electricity or natural gas to consumers through facilities provided by an electric distribution utility or natural gas utility company.

### **Do Not Knock (DNK)**

A consumer may request that he/she not be contacted at home or business by direct in-person marketers. CleanSky Energy maintains an internal list of these requests.

### **Formal Complaint**

A consumer has the right to file a formal complaint with his or her respective Public Utility Commission. Suppliers, like CleanSky Energy, are given the opportunity to respond to the complaint. However, if the complainant is not satisfied or the Public Utility Commission determines that reasonable grounds exist for proceeding with the consumer's complaint, the Commission will set a hearing date and time. Many formal complaints can have serious consequences for the supplier that is the subject of the complaints, from fines and suspension to revocation of the supplier's license to market in a specific territory.

### **Informal Complaint**

An informal complaint is a complaint where the customer has contacted the respective Public Utility Commission to file an informal complaint with the Public Utility Commission complaint department. The informal complaint must be responded to by the supplier within the designated time period per the rules and meet resolution, complaint handling and PUC record requirements. Although the complaint is called, "informal" and is not a docketed proceeding it is still a serious complaint that must be handled in conformance with the respective state complaint handling rules.

### **Internal Complaint**

Some utility's and Public Utility Commissions actually inform consumers that if they have a complaint about their electric company/supplier, they should first contact them. Suppliers, like CleanSky Energy, are required to investigate every customer complaint received, and complaints should be resolved within a reasonable time period. If the customer's complaint is not resolved to his or her satisfaction the customer may escalate the complaint with the respective Public Utility Commission.

### **Marketing Standards**

Rules and Regulations of State Commissions or other government entities detailing the requirements that Marketing Representatives must follow when marketing for an Energy Supplier.

### **Price to Compare**

Price to Compare, also referred to as the Standard Offer Service (SOS) or Default Service Offer, is the price per kilowatt-hour (kWh) or Therm that the electric or gas utility will charge to provide generation/supply to default service customers. It can be used as a comparison tool to help a customer decide if they can save



money by choosing a supplier. If a supplier's price per kWh or Therm is less than the listed Price-to-Compare, the customer would save money by choosing that supplier. In many utility territories, the Price-to-Compare appears on the customer's electric or gas bill.

#### **Retail Electric Provider (REP)**

This is the name used in Texas for companies like CleanSky Energy that sell electric energy to retail customers where the sale of electricity is open to retail competition. REPs are also known by many other names, throughout the country such as; Third-Party Suppliers (NJ), EGS (PA), RES (IL) & CRES or CRNGS (OH).

#### **Slamming**

Switching energy service without a customer's approval. This practice is illegal, and penalties are enforced by all State Commissions and criminal charges may be filed.

#### **State Commissions**

Governing bodies that regulate electric, gas, steam, telecommunications, and water utilities on the State level. They ensure safe and reliable utility service at reasonable rates.

#### **Terms and Conditions**

The non-negotiable terms of the contract between an alternative energy supplier and a customer. Alternative energy suppliers must provide a written Terms & Conditions document to all customers. To ensure that the customer receives it, CleanSky Energy usually sends it to the customer upon the completion of the enrollment authorization process as part of the Welcome Packet via email or first-class mail.

#### **Welcome Packet**

Written material sent to the customer after the customer's enrollment authorization. This packet typically contains a Welcome Letter, the Terms & Conditions document, and any additional disclosures required by law or regulation.

## **Laws and Regulations Governing Marketing, Sales and Consumer Protection**

A third-party supplier that engages in door-to-door marketing at an applicant's residence shall comply with the following requirements:

- Agent must state their first name, that they are from CleanSky Energy and the purpose of the visit during the introduction.
- Agent must provide agent ID # or another identifier upon request from customer.
- Agent is never obligated to give identifying information such as race, nationality etc.
- Customer must clearly understand that the agent is not from the Utility, but rather from CleanSky Energy.
- Customer must understand that CleanSky Energy is not affiliated with the Utility but is an approved supplier in the respective state's Energy Choice Program.
- Customer must understand that after switching to a supplier like CleanSky Energy, the Utility will still read his or her meter, deliver the electricity and/or natural gas, handle billing and respond to any utility emergencies.
- Offer must be clearly and accurately stated
- Rescission periods and any fees, such as monthly fees or early termination fees should be clearly explained
- Authorization to switch can only be accepted from the account holder and in certain states an authorized person (please check scripts).
- Deceptive and misleading information is prohibited, with zero tolerance. An agent may be asked to leave CleanSky Energy programs if this happens – even once.

- Do not sell to people lacking a strong command of the language you are speaking, or anyone who appears not to fully understand the offer. Use your best and conservative judgment when encountering the elderly, mentally impaired or hearing impaired.
- If the customer speaks a language that you don't, thank them for their time and end the visit. Then disposition as \*Language Barrier\*. The only two languages available to complete a TPV are English and Spanish. Under no circumstances should anyone be allowed to translate for you or the customer.
- Do not sell to anyone under the age of eighteen
- Do not solicit where "No Solicitation" signs are posted
- If a customer asks to be placed on CleanSky Energy's Do Not Knock list, follow your company procedure precisely. Be polite, thank them for their time and end the visit.
- Agents should always be courteous and professional
- Fraud of any kind will not be tolerated, including impersonating a customer on a telephonic verification
- All sales presentations and written documents must be approved by CleanSky Energy
- Customer information is confidential. Please see our Customer Confidentiality Policy
- Answer all questions using the supplied "Rebuttals" document. Ask your supervisor for help with questions that you cannot honestly answer
- **If it's not in the approved script or marketing & training materials, don't say it!**

## State Specific Prior Notice of Marketing Requirements

### Maryland

Pursuant to state regulation, all third-party retail suppliers participating in any direct sales solicitation in the state of MD are required to notify the Public Service Commission (PSC) and the utilities of any Door-to-Door activity prior to the activity beginning. Therefore, Vendors selling on our behalf must provide a specific date range that does not exceed one working week Example: (--/--/-- thru --/--/--). Vendors MUST also provide marketing locations (cities and zip codes) and the utility territory (BGE, PEPCO, POTOMAC, Etc..).

### Pennsylvania

Pursuant to state regulation, all third-party retail suppliers participating in any direct sales solicitation in the state of PA are required to notify the Public Utility Commission (PUC) of any Door-to-Door activity prior to the activity beginning. Therefore, Vendors selling on our behalf must provide the date range (--/--/-- thru --/--/--) or month and year (Month/Year) of when they expect to market to consumers. Vendors MUST also provide marketing locations (cities or zip codes).

### Massachusetts

Pursuant to D.P.U. 19-07-A state regulation, all competitive suppliers, electricity brokers and gas retail agents that are door-to-door marketing to residential consumers in the state of MA are required to submit daily notifications to the MA DPU. This notification should be for each marketing day, with two-business days advance notice. This notice shall include the date and up to five (5) municipalities/neighborhoods where the third-party vendor(s) intends to engage in door-to-door solicitations.

### Ohio



Per the Public Utilities Commission of Ohio (PUCO) Docket No(s); 20-0591-AU-UNC & 20-1040-GE-UNC, Competitive Retail Electric and Natural Gas Service providers are required to provide to the Director of the Commission's Service Monitoring and Enforcement Department a 48 hour notice prior to commencement of any Door-to-Door campaign. This notice shall include the times, dates, duration, and locations where the provider intends to engage in door-to-door solicitations.

All sales agents MUST also be trained and monitored on state rules/requirements where selling.

## **CleanSky Energy Code of Conduct**

As a Sales Representative for CleanSky Energy (hereafter "The Company") you are expected to fully read, understand, and always comply with this Code of Conduct. Failure to do so will result in disciplinary action, up to and including, immediate termination of your position.

A sales representative's conduct reflects on the company he or she is representing. Consequently, a sales representative is always encouraged to observe the highest standards of professionalism.

**Types of behavior and conduct that the Company considers inappropriate include, but are not limited to, the following:**

- Fraud, false statements, unfair practices, misleading, deception of any kind, unconscionable acts, or practices
- Impersonating a customer during a third-party verification, or having another person impersonate a customer during a third-party verification
- Soliciting or accepting gratuities from customers or clients
- Selling or attempting to sell customers sold for Company on behalf of another energy marketer
- Use any information regarding customers, contracts, programs, or materials adversely against Company on behalf of any future Company
- Using obscene, threatening, or abusive language, intimidation, or threats of harm to a Customer
- Discrimination of all protected classes of any kind regarding calling list or customer neighborhood locale
- Mishandling a customer's or potential customer's account
- Failing to comply with any applicable law or regulation
- Failing to comply with posted "No Solicitation" Signs and Policies
- Falsifying Company's documents (i.e. contracts; terms of service or any company paperwork provided by Company. All materials and representations used in the performance of presenting Company must be approved in advance in writing by Company's representative(s)

**Sales Representative is expected to represent the Company properly and enthusiastically. Such behavior shall include, but not be limited to:**

- Review and understand all training and marketing materials
- Adhere to the marketing scripts and materials provided by the Company
- Rightfully identify themselves to prospective customers, stating their name and the name of the company they represent. Be clear about who we are and confident about our services and how they relate to the Energy Choice Program

- Not imply, suggest, or knowingly allow a prospect to believe the sales representative is a representative, employee, agent, or directly affiliated with the local utility, state or government entity or any other retail electric or natural gas provider
- Not make any claims or statements that the prospective customers must switch in order to continue to receive electric or natural gas service
- Not make any verbal offers or guarantees other than those specifically documented by the Company – retail provider of electricity and gas
- Make sure the customer understands what the offer is. If you have explained the Energy Choice Program correctly, the fact that they will be switching suppliers should not be an issue for the customer
- Ensure an authorized decision maker is making the decision for their company or household
- Will not place any undue pressure on a prospective customer to enroll with the Company
- Never switch any customer without proper consent and verification from an authorized individual on the applicable account
- Complete all sales as prescribed by the Company including completing all paperwork and directing the actual customer through third party verification (TPV)
- Convey all material information to the customer and not omit information necessary for the customer to make an informed decision about whether to switch from their current electricity or natural gas supplier to the Company
- Answer all questions using the supplied FAQ/rebuttals. If necessary, ask your supervisor for help with questions that you can't honestly answer. The customer will appreciate it
- Adhere to the marketing script provided
- Never pitch to the elderly (IF THEY DO NOT APPEAR TO UNDERSTAND), mentally challenged, anyone under age eighteen (18) or anyone with a language barrier
- Will remain in compliance with all applicable market guidelines and rules.

### **Customer Confidentiality Policy**

We recognize the reasonable expectation of privacy for all our customers and the importance of protecting that privacy. It is CleanSky Energy's policy that both our customers' account information and the relationships between us and our customers are kept confidential. No employee, contracted vendor, or any independent agent other than those authorized, may disclose our customers' account information to anyone or any outside organization, except for approved organizations like TPV companies.

When personal customer information is provided to a Third-Party Verification company, we will expect that the Third-Party Verification companies adhere to similar privacy principles. Privacy laws prohibit mishandling a customer's information. We have established security standards and procedures to protect customer information from unauthorized use, whether inside or outside the organization. Employee access to personally identifiable information is limited to those employees with a business reason for knowing such information. We educate all employees, contracted vendors, and independent agents so that they understand the importance of confidentiality and customer privacy. We will also take disciplinary measures to enforce employee privacy responsibilities. It is also the policy of CleanSky Energy to cooperate with governmental agencies in their properly made, legitimate requests for information.

## After an Enrollment Authorization

### Welcome Packet

This packet will be emailed immediately or mailed within a few days, as prescribed by state rules, of receiving the customer's enrollment request. It contains a Welcome Letter, Terms & Conditions, and any other required enrollment documents.

### Right to Rescind

Also known as the "cooling off period" is the time frame in which customer can cancel his or her enrollment with a retail energy provider without incurring any early termination fees or penalties. This time frame varies by state. Please reference the training materials.

### Starting Supply Service with CleanSky Energy

Completing an enrollment authorization via an approved verification method will initiate the enrollment process with CleanSky Energy. Once accepted, the customer will begin to receive supply service from CleanSky Energy in accordance with the respective utilities' enrollment procedures. Customers are not switching their distribution service provider.

### Cancelling supply service with CleanSky Energy

If a customer chooses to cancel his or her enrollment with CleanSky Energy, he or she may do so by calling CleanSky Energy Customer Service at 1-888-355-6205 or by calling the utility.

## Complaints and Investigation

CleanSky Energy has processes in place to investigate, respond to and resolve all internal, informal, and formal complaints. As part of the investigative process, CleanSky Energy's Compliance personnel will reach out to respective vendors for information. CleanSky Energy requires the following from all Vendors and Marketing Representatives in the case of a complaint investigation:

- Only Quality Control personnel should conduct investigations and if permitted may contact the customer for additional information. Any contact with the complainant, by QC personnel, should be completed either by phone or in writing. If by phone, the call MUST be recorded. At no time should there be in-person contact with the complainant.
- If the complaint shared with the Vendor reads, "Please DO NOT contact the customer", then Vendors nor Marketing Representatives should contact the customer.
- Provide detailed and truthful response to the complaint inquiry.
- Ensure all informal and formal complaint investigation responses are received by CleanSky Energy within 48 hours.
- Ensure all internal complaint investigation responses are received by CleanSky Energy within 3 days.
- Notify CleanSky Energy if there are any delays on providing investigation responses. Please include reason for delay.
- CleanSky will maintain adequate record keeping for all types of complaints

Note: All complaints will be handled in accordance with all state rules because each state has very specific complaint handling procedures and timelines. I would also suggest including a bullet about complaint record keeping as well as complaint reporting requirements in several jurisdictions.

# Privacy Policy

We at CleanSky Energy know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about how we collect, store, use and disclose information about you when you interact or use our websites and mobile applications (collectively the "Websites") or any related events, trade shows, sales or marketing, and/or if you use any of our products, services or applications (collectively the "Services") in any manner.

## **What does this Privacy Policy cover?**

This Privacy Policy covers our treatment of information that we gather when you are accessing or using our Websites, Mobile Applications or Services or when you contact us in any manner. We gather various types of information, including information that identifies you as an individual ("Personal Information") from our users, as explained in more detail below.

## **What information does CleanSky Energy Collect?**

**Information You Provide to Us:** When you use our website, we may collect any Personal Information that you choose to send to us or provide to us, for example, on our "Newsletter" (or similar) online form or if you register for a CleanSky Energy

Membership Account. If you contact us through the Websites, we will keep a record of our correspondence.

**When you use the Services:** We receive and store information you provide directly to us. For example, when setting up new users, we collect Personal Information, such as name and e-mail address, to provide them with Services. The types of information we may collect directly from our customers include: name, username, email address, postal address, phone number, transactional information (including Services purchased), as well

as any other contact or other information they choose to provide us or upload to our systems in connection with the Services.

**Information We Automatically Collect:** When you use the Websites: When you visit the Websites, we collect certain information related to your device, such as your device's IP address, referring website, what pages your device visited, and the time that your device visited our Website.

### **When you use the Services**

**Usage information:** We keep track of user activity in relation to the types of Services our customers and their users use and performance metrics related to their use of the Services.

**Log information:** We log information about our customers and their users when you use one of the Services including Internet Protocol ("IP") address.

**Information collected by cookies and other similar technologies:** We use various technologies to collect information which may include saving cookies to users' computers. For further information, please see the section "Cookie and Pixel Policy".

### **How do we use the information?**

Websites:

- To administer our Website and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
- To improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- To analyze customers' use of the Websites for trend monitoring, marketing and advertising purposes;
- For purposes made clear to you at the time you submit your information – for example, to provide you with information you have requested about our Services
- As part of our efforts to keep our Website safe and secure.

Services: We may use the information we collect from our customers and their users in connection with the Services we provide for a range of reasons, including to:

- Set up a user/membership account;
- Provide, operate and maintain the Services;
- Process and complete transactions, and send related information, including transaction confirmations and invoices;
- Manage use of the Services, respond to inquiries and comments and provide customer service and support;
- Send customers technical alerts, updates, security notifications, and administrative communications;
- Investigate and prevent fraudulent activities, unauthorized access to the Services, and other illegal activities; and For any other purposes about which we notify customers and users.

We may also use the information you send to us via the Websites and/or Services, to communicate with you via email and, possibly, other means, regarding products, services, offers, promotions and events we think may be of interest to you or to send you our newsletter, if this is in accordance with your marketing preferences. However, you will always be able to opt-out of such communications at any time (see "Your Privacy Rights").

When you voluntarily provide us with a cell phone number on our Site, you are giving us express written consent to use that number for the purpose indicated, or if given with regard to your utility account or other account with us, express written consent to communicate information to you that is closely related to such account, so long as you have not given us instructions to the contrary. You may revoke this consent at any time by any reasonable method. Your consent to be contacted by us is not required in order to receive our services.

**How do we share and disclose information to third parties?**



We do not rent or sell your Personal Information to anyone. We may share and disclose information (including Personal Information) about our customers in the following limited circumstances:

Vendors, consultants and other service providers: We may share your information with third party vendors, consultants and other service providers who we employ to perform tasks on our behalf.

If CleanSky Energy has received your Personal Information in the United States and subsequently transfers that information to a third party agent or service provider for processing, CleanSky Energy shall remain responsible for ensuring that such third party agent or service provider processes your Personal Information to the standard required by our Privacy Shield commitments (see the section below headed "International Data Transfers"). Unless we tell you otherwise and you consent, our vendors do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

Business Transfers: We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

#### **Protection of CleanSky Energy and Others**

We reserve the right to access, read, preserve, and disclose any information as necessary to comply with law or court order; enforce or apply our agreements with you and other agreements; or protect the rights, property, or safety of CleanSky Energy, our employees, our users, or others.

Disclosures for National Security or Law Enforcement: Under certain circumstances, we may be required to disclose your Personal Information in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

## **Is Personal Information about me secure?**

We use technical, organizational and administrative security measures to protect all information we hold in our records from loss, misuse, and unauthorized access, disclosure, alteration and destruction. Unfortunately, no company or service can guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information. Among other practices, your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account. You should exercise discretion in what information you send to us by email. We cannot guarantee that email sent over the Internet is secure and will not be intercepted by others before it reaches us. We are not responsible for the security of information contained in emails sent over the Internet.

## **Cookies and Pixels Policy**

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first party cookies. We also use third party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. A tracking pixel (also known as Web Beacons, Pixel Tabs) is loaded when a user visits a webpage or opens an email. The website adds the tracking pixel using code into the website's HTML or email. This code contains an external link to the pixel's server. If a user visits the destination website, the HTML code is processed by the client – usually the user's browser. The browser follows the link and opens the pixel. This is registered and noted in the server's log files. In addition, various information about the user is also transmitted using this method. To some extent,

combination with JavaScript is necessary in order to collect information about the operating system or browser type.

The following data can be acquired and analyzed with a tracking pixel.

- Operating system used (gives information on the use of mobile devices)
- Type of website or email used, for example on mobile or desktop
- Type of client used, for example a browser or mail program.
- Client's screen resolution
- Time the email was read or website was visited
- Activities on the website during a session (when using multiple tracking pixels)
- IP address (gives information on the Internet Service Provider and location)

More specifically, we use cookies and other tracking technologies for the following purposes:

- Assisting you in navigation
- Assisting you in navigation;
- Assisting in login and your ability to provide feedback;
- Analyzing your use of our products, services or applications;
- Assisting with our promotional and marketing efforts.

Below is a detailed list of the cookies we use on our Website. Our Website is scanned with our tracking tools regularly to maintain a list as accurate as possible. We classify cookies in the following categories:

1. Strictly Necessary Cookies
2. Statistics Cookies

**Strictly Necessary Cookies:** These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in

forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not work. These cookies do not store any personally identifiable information.

1. CleanSky Energy – [www.cleanskyenergy.com](http://www.cleanskyenergy.com)

**Statistics Cookies:** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us know which pages are the most and least popular and see how visitors move around the site. They may be set by us or by third party providers whose services we have added to our pages. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store personal information directly, but are based on uniquely identifying your browser and internet device.

If you do not allow these cookies, you will experience less targeted advertising.

1. Facebook API – [www.facebook.com](http://www.facebook.com)
2. Google Analytics – [google.com](http://google.com)
3. YouTube, LLC – [www.youtube.com](http://www.youtube.com)

**Do Not Track:** Our Site is not currently configured to respond to Do Not Track signals sent by browsers.

### **Your Privacy Rights**

You can always choose not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

**Cookies:** You can accept or reject cookies through our Privacy Preference Centre, accessible by clicking the “cookie settings” button in our cookie policy. You can also do so by adjusting your web browser controls. Please consult our Cookie Policy for more information about our use of cookies and how to accept and reject them.

**Marketing Communications:** You can opt-out of receiving certain promotional or marketing communications from us at any time by using the unsubscribe link in the emails communications we send. Or revoke, consent, or edit data here. If you have any account for our Services, we will still send you non-promotional communications, like service related emails.

**To the National Do Not Call Registry:** The National Do Not Call Registry gives you a choice about whether to receive telemarketing calls at home. For more information, go to [www.donotcall.gov](http://www.donotcall.gov).

**How can I update and access my information (Exercise my Data Subject Rights)?**

If you would like to access, review, update, rectify, and delete any Personal Information we hold about you, or exercise any other data subject right available to you under the EU General Data Protection Regulation (GDPR), you can revoke, consent, or edit data here. Our Privacy team will examine your request and respond to you as quickly as possible! Please note that we may still use any aggregated and de-identified Personal Information that does not identify any individual and may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. California residents are entitled to ask us for a notice identifying the categories of Personal Information that we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties.

**International Data Transfers:** Personal Information you submit on the Websites or through the Services is sent to the United States and will be primarily processed by us in the United States and potentially in other countries, on our servers or on our hosted service providers cloud servers on our behalf. These countries may not have similar data protection laws to those in your country of residence. However, we will always protect your information in accordance with this Privacy Policy wherever it is processed.

**Applicable Law:** This is a United States-based Site that is subject to U.S. law. If you are accessing our Site from a location outside the U.S., you hereby agree that your use of our Site and our collection and use of your Personal

Information are subject to this Privacy Policy. When you submit Personal Information to us, you are agreeing to permit us and affiliates to access, store, and use the information wherever in the world we and affiliates do business, both inside and outside the United States.

**Linked Websites:** For your convenience, hyperlinks may be posted on the Websites that link to other websites (the "Linked Sites"). We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Sites or of any companies that we do not own or control. Linked Sites may collect information in addition to that which we collect on the Websites. We do not endorse any of these Linked Sites, the services or products described or offered on such Linked Sites, or any of the content contained on the Linked Sites. We encourage you to seek out and read the privacy policy of each Linked Site that you visit to understand how the information that is collected about you is used and protected.

### **Children**

We do not knowingly collect or solicit personal information from anyone under the age of 16. If you are under 16, please do not attempt to register for the Services or send any Personal Information about yourself to us. If we learn that we have collected Personal Information from a child under age 16, we will delete that information as quickly as possible. If you believe that a child under 16 may have provided us Personal Information, please contact us immediately by using our [Contact Us](#) form.

### **Will CleanSky Energy ever change this Privacy Policy?**

We're constantly improving our Websites and Services, so we may need to change this Privacy Policy from time to time as well. We will alert you to material changes by, for example, placing a notice on our Websites and/or by sending you an email (if you have registered your e-mail details with us) when we are required to do so by applicable law. You can see when this Privacy Policy was last updated by checking the date at the top of this page. You are responsible for periodically reviewing this Privacy Policy.

**What if I have questions about this policy?**

If you have any questions or concerns regarding our privacy policies, please use our [Contact Us](#) form to send us a detailed message to and we will try to resolve your concerns.



**Titan Gas, LLC DBA CleanSky Energy**

Exhibit 9

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CleanSky Energy copy our audit standard used to evaluate the performance of our vendors or agents. CleanSky energy is yet to sign an agreement with any vendor or third party agents to work on our behalf in New Hampshire.





## Northeast Direct Sales Monitoring Guidelines

### Proper Agent Training:

CleanSky Energy provides all training materials to its contracted sales vendors with the expectation that the materials will be provided, reviewed, and studied by any Marketing Representative that will be representing the CleanSky Energy brand. Prior to going out to the field each Representative must confirm, by signing the Training Acknowledgement form, that he or she has reviewed, understood, and successfully completed each step of the Training Program and has passed both the Sales and Compliance quizzes with a score of **90** or higher.

### Improve Agent Performance & Development

On a monthly basis, vendors should conduct refresher sessions with all active Marketing Representatives to ensure adherence to our policies and procedures and to determine the Representatives' strengths and weaknesses.

### Dress Code, Curfew & Permits

All direct sales representatives **MUST** wear:

- CleanSky Energy branded windbreaker, branded jacket, or a branded shirt. Occasionally a solid color white polo shirt or a solid color white button down shirt may be worn. Khaki or dress pants or shorts are preferred (skirts knee level for women), however, blue jeans are allowed if they are presentable and well-fitting, without rips or any holes.
- CleanSky Energy ID badge & branded lanyard around the neck and visible the entire time the agent is in the field. It should not be in the pocket, messenger bag or attached to pants.
  - ID badge **MUST** be printed in color, laminated, placed in sleeve & attached to branded lanyard.
- CleanSky Energy branded ballcaps, beanie's, etc.... are optional. **Except if selling at any event, tabletop, retail, or podium location.**

Door-to-door Representatives must NOT wear:

- Sports team jerseys
- Any type of other branded ball cap (only CleanSky Energy's branded ball caps allowed)
- Torn or revealing clothing, including distressed jeans
- Any type of printed shirts or sweatshirts that are not CleanSky Energy branded
- hard hats of any kind
- reflective vests of any kind
- utility company branded gear or stickers
- camouflage, gym, or basketball shorts



#### Curfew:

Door-to-door marketing is permitted during the following hours:

- 9 a.m. to 7 p.m. from October 1 to March 31,
- 9 a.m. to 8 p.m. from April 1 to September 30.

When a local ordinance has stricter limitations, Representatives **MUST** comply with the local ordinance

- OHIO requires 9am to 7 pm all year, in absence of a local ordinance.
- ILLINOIS requires 9am to 7pm, or civil dusk, whichever is earlier, in absence of a local ordinance.
- DISTRICT OF COLUMBIA requires 9:00am to Sunset all year.

#### Permitting Requirement:

Representatives must adhere to any Non-Trespassing, Non-Solicitation, or Do-Not-Knock regulations, and must obtain any permits required for "peddling" or "soliciting" in assigned markets. Furthermore, only one Representative is allowed at a consumer's home unless an agent is being trained (max two at a door for training purposes only). Also, until further notice, face coverings must be worn in the field.

**IMPORTANT NOTE #1:** If stopped by the police for not having the required permits, or for any other reason, the Representatives **MUST** inform the police that they are Independent Representatives working directly for your organization. They are not employees of CleanSky Energy.

**IMPORTANT NOTE #2:** In the state of Illinois, the law provides that the alternative retail electric supplier agent shall obtain consent to enter multi-unit residential dwellings. Consent obtained to enter a multi-unit dwelling from one prospective customer or occupant of the dwelling shall not constitute consent to market to any other prospective customers in the dwelling without separate consent.

**IMPORTANT NOTE #3:** In the state of Ohio, the applicant must agree to receive the enrollment forms electronically (via email). If not, you must provide the applicant with a legible copy of the signed Contract, Terms of Service and other required enrollment documents.

### On the Front Line – Questions to ask yourself?

How is this agent doing at representing our organization to customers?

#### Objective

- Instruction ← Is the customer aware of what's to come during the TPV process
- Confirm product completion
- Compliance

#### Improvements

- Determine changes needed to ensure plan's objectives can be met.

#### Implement

- Document Activities
- Monitor and record progress against plan
- Assign Coaching/re-training

**CleanSky Energy's  
Direct Sales (Door to Door, Retail or Tabletop)  
Quality Assurance Policy**

**Introduction**

CleanSky Energy is strongly committed to providing premium quality customer acquisitions. This policy identifies responsibilities for performing quality activities and verifying compliance. CleanSky Energy will provide compliance training documents that outline strict adherence to all local, state, and federal rules and regulations that must be followed by all individuals representing CleanSky Energy.

**Quality Assurance (QA)** is the process that ensures quality control measures have been established and the desired service is achieved. **Quality Control (QC)** refers to the procedures, methods, and actions that are routinely employed to produce the expectations of our CleanSky Energy.

This policy has been put in place to implement procedures in which CleanSky Energy's vendors will use to ensure the performance of its field sales agent's activities and their process of conducting quality customer acquisitions.

**Daily TPV Audits** — QA member will perform the following:

- Will on a daily basis monitor TPV activity.
- Will check the GEO locations of the sales to make sure they are within compliance distances and time frames. Will also, look for red flags such as sales made within minutes from one another that are across town miles away.
- If there are over 7 unique customer sales from any one agent, the TPVs will be reviewed.
- Will assure no sales are being conducted after ordinance ruled times (after hour sales).
- Will review TPV "No sales" percentage below 20%.
- Will review any instances in which duplicate BTN (customer phone #) use has been identified.
- Will review TPV when a "No sale" is followed by a "Good sale" at the same residence.

Any infraction found from the above lined items may result in a proactive cancellation of the enrollment and chargeback of any paid commissions. Vendors are required to immediately notify CleanSky Energy of any failed audits or reported customer complaints.

**Periodic Field Audits** — All managers are expected to conduct random field audits 2 times weekly shadowing field agents to ensure they are providing the correct information to the consumers.

**Periodic Customer Call Backs** — (If client permitted) A random customer call back is made by a QA team member to ensure the agent represented CleanSky Energy in the upmost professional behavior.

**Weekly Calibration** — Weekly or bi-weekly calibration calls will be conducted between CleanSky Energy and the vendor's QA team and managers to review sales performance and quality.

**Note:** This "Quality Assurance Policy & Enforcement and Accountability Policy" set forth within will be reviewed periodically to ensure ongoing suitability and effectiveness.

**CleanSky Energy's  
Direct Sales (Door to Door, Retail or Tabletop)  
Enforcement and Accountability Policy**

Disciplinary action shall be based upon the severity of the infraction. **Most** hearsay complaints will not subject a Sales Agent to suspension or termination. **In most cases**, only evidence of wrongdoing or an obvious pattern of similar complaints will result in such action. However, we do take allegations like misrepresenting oneself as an employee of the utility company very seriously. One of these allegations alone may result in a suspension. Complaints are to be designated by levels of infractions such as "Lower Level," "Mid-Level," "Major Level."

**Lower Level Infractions - A written verbal warning and/or 1-day suspension. Reported weekly during Calibrations.**

- Not complying with the dress code
- Not wearing the CleanSky Lanyard & ID Badge (must be around neck)
- In states where required, not giving customer a leave behind or business card with CleanSky Energy's contact information and his or her name
- Not entering correct customer information in client portal
- In states where required, not leaving the customer's property during the TPV
- Entering a customer's house without the customer's permission.
- Knocking on a customer's home who is on the Do Not Knock list
- Any agent heard coaching or telling a customer what to say during a TPV (training issue)
- Enrolling a customer without being fluent in English or Spanish (language barrier)
- Calling incorrect TPV enrollment center
- Enrolling customer before or after hours
- First alleged vague complaint of misrepresenting oneself as an employee of the utility company, a public utility commission and/or any government agency – **automatic 1 day suspension**
- A pattern of a Lower Level similar unproven complaint – **automatic 1 day suspension**

**Mid-Level Infractions - A 2 to 3-day suspension and re-training. Reported to vendor before suspension.**

- Telling a customer misleading service, promotion, or product information (training issue)
- Aggressive behavior towards TPV agent (recorded)
- Two or more Lower Level infractions during same sales presentation
- Three or more Lower Level infractions in a period of two weeks
- Knocking on doors or entering buildings with "No Trespassing/No Soliciting" signs
- Second alleged vague complaint of misrepresenting oneself as an employee of the utility company, a public utility commission and/or any government agency – **automatic 3 day suspension**
- Second pattern of a Lower or Mid-Level similar unproven complaint – **automatic 3 day suspension**

**Major Infractions - Immediate termination from program. Reported to vendor before termination.**

- Slamming - proven or pattern of unauthorized enrollment of a customer
- Knowingly processing enrollments from an unauthorized party
- Completing a TPV for a customer or authorized person
- Knowingly enrolling a customer who is mentally disabled, hearing impaired or too elderly to understand what he or she is doing.
- Proven, or highly credible descriptive complaint or repeated pattern of misrepresenting oneself as an employee of the utility company, a public utility commission and/or any government agency
- Displaying fake identification, wearing hard hats or any utility branded gear or reflective vests
- Aggressive behavior towards client sales support staff
- Any type of fraudulent activity or breaking any laws
- Any egregious violation of state, local and internal policies.
- Third pattern of a Lower or Mid-Level similar unproven complaint

By signing below, I understand and I agree to abide by CleanSky Energy's Enforcement and Accountability Policy.

Vendor Company Name: \_\_\_\_\_

Vendor Manager Name: \_\_\_\_\_

Title: \_\_\_\_\_

Vendor Signature Name: \_\_\_\_\_

Date: \_\_\_\_\_



**Titan Gas, LLC DBA CleanSky Energy**

Exhibit H

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CleanSky Energy has plan for in person solicitation of residential customers at their residences. We are including provision to ensure legal and regulatory compliance and quality assistance.

Welcome to



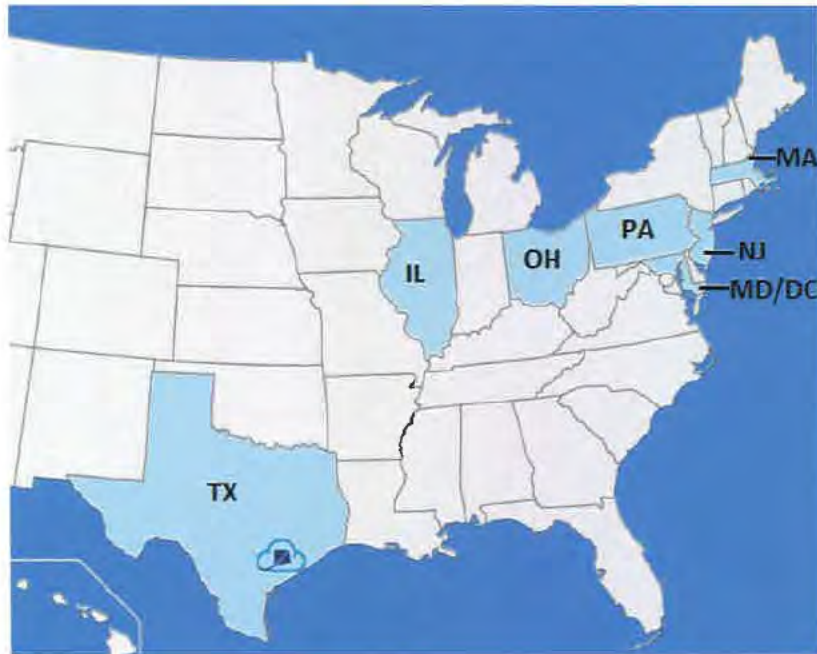
**CleanSky**  
energy

# Today's Starting Lineup



# About Us

CleanSky Energy is an approved Retail Energy Provider headquartered in Houston, TX. It was founded in 2004 and currently supplies electricity and natural gas to residential and commercial consumers in the states of **IL, MA, MD, NJ, OH, PA, TX** and **Washington D.C.**





# Our Mission & Vision

## Our Mission

Our mission is to empower people to reduce pollution by making clean energy affordable, simple and practical.

## Our Vision

Our vision is a world powered by only 100% clean energy.



# Our Four Pillars of Customer Value



## Affordable

CleanSky Energy understands price matters. We purchase energy on your behalf and give you an affordable, competitive fixed rate so you can enjoy peace of mind and a great rate.



## 100% Clean Energy

CleanSky Energy only provides 100% clean wind and solar power and 100% & 200% carbon offset gas, resulting in less pollution and a happier and healthier community.



## Transparent

CleanSky Energy provides simple and easy to understand plans, honest communication, and no hidden fees. This allows you to make more informed decisions and to experience less bill shock. Avoiding surprises means less stress and more happiness.



## Customer-Obsessed

CleanSky Energy is passionate about providing you with an amazing customer experience. Expect fast response times, friendly agents, and on-the-spot resolutions so you can spend less time communicating with us and enjoy more time doing something you love.

# Our Core Values



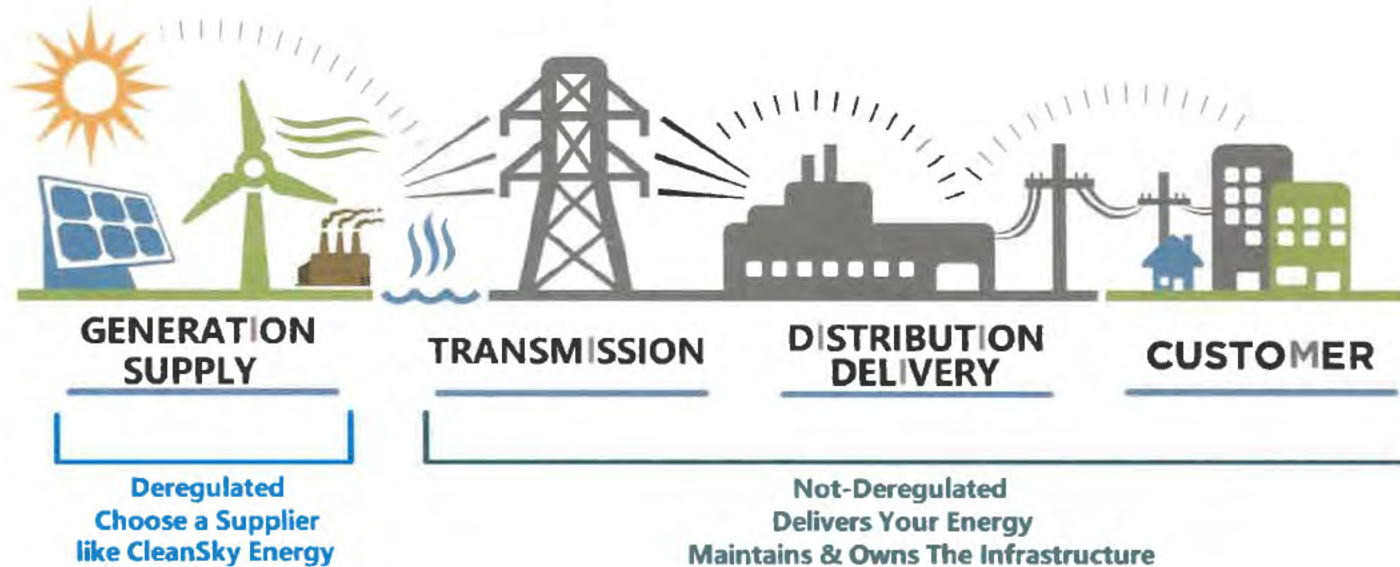
# Deregulation Overview

- ❖ **Monopoly** - In history, consumers had no choice but to purchase electricity and natural gas from the local utility. Energy was supplied and delivered only by utilities with monopoly contracts approved by the state and local governments.
  - ❖ **Regulation** - These monopolies divided states into regions and there was generally only one local provider of energy, within a region, that handled all generation, transmission and distribution of electricity and/or natural gas.
  - ❖ **Prices** - Electricity and natural gas prices were regulated by the state and federal government. Consumer utility services were provided by one utility company.
- 
- ❖ **Deregulation** - Beginning in the 1990s, the federal government acted to inject competition into markets for wholesale power production and bulk sales of electricity. At the same time, many states acted to end monopoly protections for retail sales of electricity and natural gas providing consumers with the ability to purchase energy from independent retailers.
  - ❖ **Choice** - Energy Choice Programs are now offered by many state and utility companies that encourage consumers to shop for a retail energy provider that can supply their energy needs and benefit from innovative plans and offers.

# How it Works

- **Choice:**  
Consumers can now choose a Retail Energy Provider, like CleanSky Energy.
- **Retail Energy Provider:**  
Providers, also known as **Suppliers**, purchase electricity and natural gas on the wholesale markets and arrange for the utility to deliver it to the customer's home or business.
- **Utility:**  
**Utility Companies** and operates the infrastructure (poles, wires & gas pipes) through which the electricity and natural gas is **delivered** to the customer's home or business.
- **No Interruption in Service:**  
The switch is seamless, and the accounts will still be managed by the local utility companies. They will continue to read the meters, respond to any utility emergencies and handle billing.
- **Billing Components:**
  - The utility bill has always been made up primarily of two main charges;
    - **Supply** (generation) charges -> This is the section that is **deregulated!**
    - **Delivery** (distribution) charges -> This is the section that remains with **the utility!**
  - Other smaller charges consist of some tariff, taxes and transmission charges.

# Supply & Delivery



# Our Plans & Products

CleanSky Energy gives consumers access to affordable electricity and natural gas products, without compromising their customer service. Our goal has been to offer the right plans at the right prices with a focus on delivering value to our customers. Whether they own a home or business - large or small, CleanSky Energy is committed to making their energy experience worthwhile, cost effective and worry-free. Here are our plans and products:



## RENEWABLE ELECTRICITY

- 100% matched with Renewable Energy Certificates (RECs)
- Represents generation from resources like wind and the sun
- No monthly fees



## GAS CARBON OFFSET

- 100% or 200% matched with Renewable Energy Certificates (RECs) and/or Carbon Credits through reputable standards such as The American Carbon Registry.
- No monthly fees



## LOCKED/FIXED

- Peace of mind and security (protection against spikes in the market)
- A locked rate for a specific term (customers are eligible to renew)
- An early termination fee may apply (see rate sheet)

# What's a Commodity?



**Commodity**, in economic terms, is a tangible good that can be bought and sold or exchanged for products of similar value.

Like other classes of assets such as stocks, **commodities** have value and can be traded on **open markets**. And like other assets, commodities can fluctuate in price according to **supply** and **demand**. **Electricity and Natural Gas** are considered commodities.

**Non-Commodity** items are more unique, historical, or rare. They are items that potentially are no longer available from original sources. **Non-commodity** items are things like: Vintage items, collectibles, used cars & land.





## Renewable Energy

- **Renewable Energy** is produced from natural resources that are endlessly replenished such as **wind and solar**.
- When you enroll with **CleanSky Energy**, we will purchase your electricity from the grid to handle your immediate power needs. We then purchase enough **Renewable Energy Certificates (RECs)** to equal or exceed your usage.
- This guarantees your electricity usage is offset with a direct investment in **100% renewable energy**.



## Carbon Offset

- **Carbon Offset** is a reduction in emission of carbon dioxide or other greenhouse gases made in order to compensate for emissions made elsewhere.
- A **carbon footprint** is the total amount of greenhouse gases (including carbon dioxide and methane) that are generated by our actions.
- By choosing a Carbon Offset plan, you are taking action to compensate for the carbon emissions caused by your natural gas consumption with an **investment in projects** that reduce or remove greenhouse gas emissions.



## What the HECK is a REC?

**Renewable Energy Certificates (RECs)** are proof that energy has been generated from renewable sources such as solar or wind power. Each REC represents the environmental benefits of 1MWh of renewable energy generation. When you purchase RECs, renewable energy is generated on your behalf.

### Will the renewable energy be delivered directly to my home or business?

When you purchase RECs it is guaranteed that renewable energy has been generated on your behalf and sent to the electrical grid, which is the network that delivers electricity from suppliers to consumers. However, once it enters the grid, it is impossible to distinguish where or how that electricity is being delivered. As more and more people purchase RECs, we become closer to true energy independence.





# Renewable Energy



- Think of the electric grid as a giant water cooler that is refilled from two faucets.
- One faucet represents electricity generation from sources such as coal, crude oil, natural gas and nuclear.
- The other faucet represents electricity generation from renewable energy sources such as **wind and the sun**.
- Currently, most sources filling the water cooler are from polluting fossil fuels and nuclear energy (which produces hazardous waste).
- As more customers request electricity from renewable sources, more “clean water” pours into the “water cooler” and less “dirty water” is added.
- Eventually, the color of the water cooler begins to clear up as more and more people begin demanding **clean energy**.

# Our Sales Channels



TELEMARKETING



AGGREGATIONS



DOOR-TO-DOOR



ONLINE/OPT-IN



CUSTOMER SERVICE



DIRECT MAIL



RADIO



SOCIAL MEDIA

# Signup Process

- 1) **Sale:** Marketing Representative makes the sales pitch.



- 2) **Verification:** Verifier reviews the sale, confirms customer information and verifies customers voluntary request to switch suppliers.



- 3) **CleanSky Energy:** Verifies data and submits enrollment request to the Utility.



- 5) **CleanSky Energy:** Sends customer their Welcome Letter and Terms Of Service.

- 4) **Utility:** Verifies all information and notifies (accept or reject) to **CleanSky Energy**, former provider (if applicable) and the customer.



- 6) **CleanSky Energy:** Begins service for new customer within the next meter read or two. Sometimes even sooner.



# Definition Overview

▶ **EDU** - Electric Distribution Utility. AKA Utilities Company & Local Distribution companies.

▶ **REP** - Retail Energy Provider (Supply companies competing to supply consumers with energy).

▶ **PTC** - Price to Compare: the price a customer pays the utility for generation and transmission if they do **not** choose a generation supplier.

▶ **Generation Service** - Supply service (This is what is deregulated)

▶ **Energy Deregulation** - Allows retail energy providers to compete to buy natural gas and electricity at the best possible prices and passing any savings to customers. Deregulation lets customers shop for a retail energy provider instead of paying what the Local Utility Companies charges.

▶ **Energy Choice Program** - Developed by state governments to end utility monopolies. In a deregulated state, like the one you live in, customers have the power to choose an energy supplier, Like [CleanSky Energy](#), rather than purchasing from the utility.

▶ **Do Not Call List** - A consumer may request that he/she not be contacted by telephone for marketing purposes. In accordance with FTC and FCC guidelines, these requests must be honored. A consumer may place his/her phone number on a National or State Do Not Call registry. All organizations are also required to keep and maintain internal Do Not Call Lists. Telemarketers may not call phone number on one of these lists.

▶ **Do Not Knock (DNK)** - A consumer may request that he/she not be contacted at home or business by direct in-person marketers. [CleanSky Energy](#) maintains an internal list of these requests.

▶ **Rescission Period** - AKA "Cooling-Off" Period is the customer's right to rescind the agreement with a REP within a certain period (varies per state).

# SOME FAQs



## Who bills the customer?

The utility sends one bill to the customer, which includes the utility's delivery charges and CleanSky Energy's generation/supply charges. This is known as Utility Consolidated Billing.

## How are CleanSky Energy's generation charges displayed?

CleanSky Energy's generation charges (supply charges) will be displayed on Utility's bill as a single invoice line-item under the supply section of the bill.

*EX: Customer uses 1,000 kWh and the supply rate is eight cents per kilowatt hour.*

*Generation/Supply: 1,000 kWh X \$0.08 = \$80.00*

## Will early termination fees (ETFs) be billed on the Utility's invoice?

No. if there are any ETFs, CleanSky Energy will bill the customers separately and this charge will not appear on the utility's invoice (See Rate Sheet for any ETFs).

## What does Rescission mean?

It's a fancy legal term for the cancellation of a contract and the return of the customer to the position he or she would have had if the contract had not been made. When choosing a supplier, like CleanSky Energy, customers have the right to rescind within a certain timeframe before being responsible for any ETFs.



# MORE FAQs



## What does POR mean?

It's the acronym for **Purchase Of Receivables**. A POR agreement allows suppliers, like **CleanSky Energy**, to be paid upfront for the energy supply sold to the customer while the utility company collects the balance directly from the customer.

## What is Budget Billing?

It's basically a set amount that you pay each month for your utility bill. Your utility company for example, will look at the amount of money you spent on your electricity and or gas the year prior. They will add an additional percentage to this number to cover inflation and then divide the total number by 12 months. The number you're left with is what you will pay each month.

Budget Billing may be adjusted during the year and may include reconciliations at the end of the budget period to account for differences between actual charges and set budget amounts.

## Does CleanSky Energy offer budget billing?

No. **CleanSky Energy** does not currently offer budget billing.

# Third Party Verification (TPV)

Customers are protected against dishonest sales practices, and by law, we must get an independent review of our transactions, which confirm the customers request to switch to an approved retail energy provider like [CleanSky Energy](#).

MOST sales are Third Party Verified by a live or automated phone call. Some may be verified via a digital process using tablet or other devices where allowed and available.

Make sure you have explained to the customer all the details of the plan, including energy price, agreement term and any cancellation fees. This will help ensure that the TPV call, text or email is understood and goes smoothly to finalize the sale. Accurate explanation of the product and services should be included in all sales transactions for the sales to be validated.

**IMPORTANT NOTE:** In the state of Ohio, the door-to-door sales agent is not to return before, during, or after the independent third-party verification process.

**There should be NO COACHING of the customer at any time and only the person authorized may complete the verification process.**



# Adverse Customer Situation



## Leave Premises/End Call If:

- Customer asks you to leave and/or not to contact again them again (add to Do Not Knock/Do Not Call list & notify supervisor)
- After 3 rebuttals max (3 no's and go)
- Customer becomes irate
- Customer uses profanity, racial slurs, etc.

## Your Responsibilities:

- Do not argue with a customer
- Do not yell at a customer
- Do not use profanity, racial slurs, etc.
- Do not threaten a customer
- Do not use inappropriate phrases such as “I hope you have a terrible rest of your day.”
- Be professional and keep your cool
- In most difficult situations, the key is to just walk away/end the call-----→ Not everyone is a customer.

# Compliance

The General Purpose and Scope of all the respective state commission's rules were enacted to:

- Provide minimum standards for service quality, safety, and reliability;
- Provide consumers with sufficient information to make informed decisions about competitive retail energy service; and to
- Protect consumers against false, unfair, misleading, deceptive, and unconscionable acts and practices in the marketing, solicitation, and sale of retail energy and in the administration of any contract for that service.

Remember, because of energy deregulation, customer's now have the option to compare prices from energy suppliers against what the utility charges the customer for kilowatt-hours or therms used in each month. Purchasing energy supplies from a company other than from the electric or gas utility is purely an individual's decision; it has no impact on the reliability or safety of the service.

**DON'Ts**

&

**DO's**

## Compliance

- ▶ Do not make any savings or guaranteed lower rate claims if they are not true or cannot be substantiated over the term of the contract.
- ▶ Do not say I need to see your bill to make sure you are receiving the proper discount, rebate or refund from the utility.
- ▶ Do not ever imply that you are working on behalf of the utility or wear or include misleading logos or brand clothing, equipment or marketing materials.
  
- ▶ Say, "Our products are fixed and 100% matched with RECs, which offer peace of mind and help the environment."
- ▶ Say, "Let's review your bill to see the rate plan you are on today and review other options."
- ▶ Say, "I represent CleanSky Energy and I'm here regarding the energy choice program."

# Compliance

Please review the following Compliance Training materials that were sent separately:

- Compliance Training Manual (Word Document)
- Direct Sales Monitoring Guidelines (Word Document)
- Door to Door Quality Assurance Policy (Word Document)
- Direct Sales Script Guideline (Word Document)
- Retail Campaign Table Set Up Requirements - if applicable (Word Document)

After you review all Sales & Compliance training materials, take and pass the required quizzes, complete and sign the Training Completion Acknowledgement form, then you are ready to be onboarded and to start selling on behalf of CleanSky Energy.

**WELCOME TO THE TEAM!**



**CleanSky**  
energy

**Any  
Questions?**





**Titan Gas, LLC DBA CleanSky Energy**

Exhibit I

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An example of our agent's badge. Page one is the front and page 2 indicates the content at the back of the badge.





**CleanSky**  
energy

**[Agent Name]**

**Agent ID:**

**Agent is approved by CleanSky Energy**

**OH PUCO certificate numbers: Power(13-700E)**

**Gas(15-485G)**

Place  
Agent Photo  
Here

**CleanSkyEnergy.com | (888) 355-6205**



**WE ARE NOT  
YOUR UTILITY**

**CleanSkyEnergy.com | (888) 355-6205**



**CONFIDENTIAL DOCUMENTS**

**Titan Gas, LLC DBA CleanSky Energy**

Exhibit FS

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CleanSky Energy Financial Documents – Request for confidential treatment of the documents