

**DEPARTMENT OF ENERGY SUMMARY INFORMATION RE: TITAN/CLEANSKY REGISTRATION DENIAL**

A review of the complaint data provided by Titan/CleanSky in its registration application, shown below, raised concerns regarding the number and pattern of complaints in other states where the company conducts business. Titan/CleanSky’s response was first that the complaints were not significant given the number of customers served within Ohio and Pennsylvania. Titan/CleanSky also stated that it had terminated services with a “rogue” door-to-door (D2D) vendor, which was the root cause of the slamming complaints, and that a name change coupled with a billing system failure was the root cause of billing disputes in Ohio and Pennsylvania.

Complaint Type	(enter applicable states/jurisdictions in row just below)										Total
	IL	MA	MD	NJ	OH	PA	TX				
ACH PAYMENT UPDATE	0	0	0	0	0	0	1				1
CANCELLATION REQUEST	0	0	3	0	4	5	0				12
MISLEADING SALES PRACTICES	0	3	9	2	5	4	0				23
SLAMMING	1	17	28	7	32	65	0				150
RENEWAL NOTICES NOTRECEIVED	0	0	0	0	9	2	0				11
DO NOT CONTACT LIST (DNC)	0	1	2	0	3	12	0				18
BILLING DISPUTE	0	1	6	2	45	109	0				163
ENROLLMENT DISPUTE	0	0	0	0	0	1	1				2
COLLECTION DISPUTE	0	0	0	0	2	0	0				2
	0	0	0	0	0	0	0				0
	0	0	0	0	0	0	0				0
<b>Total</b>	<b>1</b>	<b>22</b>	<b>48</b>	<b>11</b>	<b>100</b>	<b>198</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>382</b>

While the NH Department of Energy appreciates the action that Titan/CleanSky stated it took relative to a D2D sales vendor, and we recognize that Titan/CleanSky is not proposing to undertake D2D sales in New Hampshire, it is nonetheless troubling that close to 150 slamming complaints and 23 misleading sales practices complaints occurred over a two-year period. Similarly, Titan/CleanSky’s reported actions following its billing system failure are to be commended.

In our experience, complaints to a regulatory agency typically underrepresent the magnitude of any issue, much like the tip of an iceberg provides no indication as to its actual size. As such, the reported number of complaints, while compelling on its face, is not in any way diminished by the number of customers enrolled in each state. For perspective, were the Department to receive a dozen or more slamming complaints from customers over the period of a few months or a year, it would likely begin an informal investigation into the supplier’s practices, as well as potentially initiating a proceeding to suspend or revoke the supplier’s registration.

Conversations with other state regulatory agencies indicated that at least one state commission had concerns about trends in complaints from consumers in 2022. While not all complaints result in a formal investigation, informal investigations into the complaints received were troubling to that state commission, the Pennsylvania PUC. Information regarding customer complaints pending at the Pennsylvania PUC is available through this web link: [Penn PUC customer complaint search results](#).

The Department is open to reviewing these issues with Titan/CleanSky, but would note that, in addition to the troubling trends observed in the complaint statistics provided in Titan/CleanSky's registration application, a review of publicly available information from the Maryland Public Service Commission website shows that complaints regarding Titan/CleanSky continue to be of concern there as well, with more than half of the issues with a CAD determination found in favor of the customers. See [Published Reformatted Supplier Report FY2022-4th quarter \(state.md.us\)](#)

[Published Reformatted Supplier Report FY2022-4th quarter \(state.md.us\)](#)

Retail Energy Supplier	Issues* alleged in complaints FY2022					Consumer Affairs Division (CAD) determination* in favor of FY2022		
	Enrollment Dispute	Misrepresentation	Early termination fees	Start/stop	Other	Customer	Company	N/A
CleanChoice Energy dba Ethical Electric dba Clean ChoiceOption dba CleanChoice Energy	1				3	3	1	
Direct Energy Services, LLC	2				4	1	2	
Greenlight Energy, Inc.	7	1			4	9		2
Josco Energy USA LLC	2				1	2	1	
Planet Energy dba Riterate Energy dba Value Plus Energy				4			4	
RPA Energy, Inc. dba Green Choice Energy	5	1			1	4	1	1
SFE Energy Maryland, Inc.	17	4	4	6	14	21	4	1
U.S. Gas & Electric dba Maryland Gas & Electric	1		1	3	1	1	1	1
Titan Gas and Power dba CleanSky Energy	9	2	1	3	10	11	7	1
WGL Energy Services, Inc.	6				1	3	3	1

\* The total number of issues may be higher than the number of complaint determinations since a single complaint may concern more than one issue.

\*\* N/A - Not applicable if the dispute is still pending, the supplier or customer withdrew the complaint, or if investigation outcome is undetermined.