

**Electric Load Aggregation Application Form**

This form may be used to: (1) apply for initial registration as an electric load aggregator in New Hampshire, (2) apply for renewal of registration as an electric load aggregator in New Hampshire, and (3) notify the Department of Energy of any changes to information in a previously filed electric aggregator application form. This form is provided as a convenience for filing only. You are required to provide all information specified under Puc 2006.02 when applying for initial or renewal registration as an electric aggregator, 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 2006.02(a)	Legal Name	Utility Services Advisory Group, Inc.
	Trade Name (d/b/a) (if applicable)	USA Group Energy - and USA Energy
Puc 2006.02(b)	Business Mailing Address	812 Pinellas St Clearwater, FL 33756
	Telephone Number	855 328-8008
	E-Mail Address	info@usagroupenergy.com, mike@usagroupenergy.com
	Website Address (if applicable)	www.usagroupenergy.com
Puc 2006.02(c)	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 the applicant is anything other than an individual. Use additional sheets if your response exceeds the space provided on the form.	
	Name	see additional sheet
	Title	
	Business Mailing Address	
	Telephone Number	
	E-Mail Address	
	Name	
	Title	
	Business Mailing Address	
	Telephone Number	
	Email Address	
	Name	
Title		
Business Mailing Address		
Telephone Number		
E-Mail Address		

1. "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.



Customer Service Contact		
Puc 2006.02(d)	Name	Brent McDaniel
	Title	Pres.
	Telephone Number	855 328-8008
	Toll-Free Telephone Number (if available)	same
	E-Mail Address	brent@usagroupenergy.com

Customer Complaints Contact		
Puc 2006.02(e)(1)	Name	Brent McDaniel
	Title	Pres.
	Business Mailing Address	812 Pinellas St
		Clearwater, FL 33756
	Telephone Number	855 328-8008
	E-Mail Address	brent@usagroupenergy.com

Regulatory Compliance Matters Contact		
Puc 2006.02(e)(2)	Name	Brent McDaniel
	Title	Pres.
	Business Mailing Address	812 Pinellas St
		Clearwater, FL 33756
	Telephone Number	855 328-8008
	E-Mail Address	brent@usagroupenergy.com

Department of Energy Assessment Payments Contact		
Puc 2006.02(e)(3)	Name	Elizabeth Currier
	Title	CFO
	Business Mailing Address	812 Pinellas St
		Clearwater, FL 33756
	Telephone Number	855 328-8008
	E-Mail Address	bess@usagroupenergy.com

Separate Attachments: Business Authority and Trade Name	
Puc 2006.02(f)	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 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; (2) or 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 2006.02(g)	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 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.

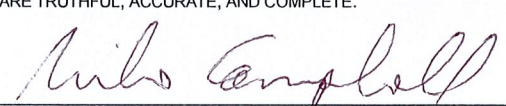


Statements Regarding Applicant and its Principals		
	Please respond to each of the following questions with either "Yes" or "No."	
Puc 2006.02(h)(1)	Has applicant or any of its principals ever been convicted of any felony that has not been annulled by a court?	no
Puc 2006.02(h)(2)	Has applicant or any 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 2006.02(h)(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 2006.02(h)(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 2006.02(h)(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?	yes
	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.	see sheets

Other States		
Puc 2006.02(i)	Please list other states or jurisdictions in which the applicant currently conducts business relating to the aggregation of electric customers.	see list

Statement Regarding Supplier Representation		
Puc 2006.02(j)	Please respond to the following question with either "Yes" or "No." Is the applicant representing any supplier interest?	no
	If the response to the preceding question is "Yes," please list the supplier(s) represented. Use additional sheets if needed.	

Expected Marketing Start Date		
Puc 2006.02(k)	Provide the date upon which the applicant expects to commence marketing its services to customers in New Hampshire.  (or when approved)	15 April 2023 Date

Attestation and Signature		
Puc 2006.02(l) and (m)	<p>BY SIGNING BELOW, THE APPLICANT REPRESENTATIVE CERTIFIES THAT IT HAS THE AUTHORITY TO FILE THE APPLICATION ON BEHALF OF THE AGGREGATOR 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: Mike Campbell</p> <p>Title: VP Administration</p>	<p>23 March 2023 Date</p>

Filing Instructions		
	<p>1) Mail an original and two paper copies of this form and all separate attachments to:            New Hampshire Department of Energy, 21 South Fruit St.,            Suite 10, Concord, NH 03301</p> <p>2) E-mail a PDF of this form and all separate attachments to:  <u>registrations@energy.nh.gov</u></p>	

<b>Puc 2006.02(c)</b>	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), 1 if the applicant is anything other than an individual. Use additional				
<b>Name</b>	<b>Title</b>	<b>Business Mailing Address</b>	<b>Phone</b>	<b>Email</b>	
John Brent McDaniel	President and Director	812 Pinellas St Clearwater, FL 33756	855 328-8008	brent@usagroupenergy.com	
Elizabeth P Carrier	Treasurer/Shareholder	812 Pinellas St Clearwater, FL 33756	855 328-8008	bess@usagroupenergy.com	
Michael R Campbell	Secretary/Shareholder	812 Pinellas St Clearwater, FL 33756	855 328-8008	mike@usagroupenergy.com	
Dorthe McDaniel	Director/Shareholder	812 Pinellas St Clearwater, FL 33756	855 328-8008	dorda1@yahoo.com	
Caleb McDaniel	Director/Shareholder	812 Pinellas St Clearwater, FL 33756	855 328-8008	calebmick2002@yahoo.com	



PUC 2006.02 (f)

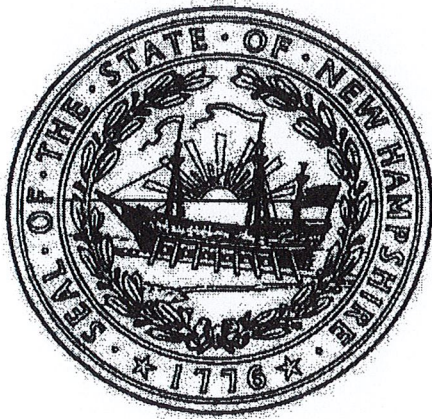
**State of New Hampshire**  
**Department of State**

CERTIFICATE

I, David M. Scanlan, Secretary of State of the State of New Hampshire, do hereby certify that UTILITY SERVICES ADVISORY GROUP, INC. is a Florida Profit Corporation registered to transact business in New Hampshire on February 06, 2023. 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: 922960

Certificate Number : 0006112540



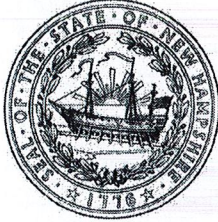
IN TESTIMONY WHEREOF,

I hereto set my hand and cause to be affixed  
the Seal of the State of New Hampshire,  
this **6th** day of **February** A.D. **2023**.

A handwritten signature in black ink, appearing to read "D. Scanlan", is written over a faint circular stamp.

David M. Scanlan  
Secretary of State

PUC 2006-02 (g)



# State of New Hampshire

## Department of State



Accepted Date: **03/22/2023**

Business Name: **USA GROUP ENERGY**

Principal Office Address: **812 Pinellas St, Clearwater, FL, 33756, USA**

RE: Acceptance of Trade Name Registration \_\_\_\_\_

This letter is to confirm the acceptance of the following Trade Name Registration: \_\_\_\_\_

Business ID: **923262**

Filing #: **6165336**

Expiration Date: **03/02/2028**

Effective Date: **03/02/2023**

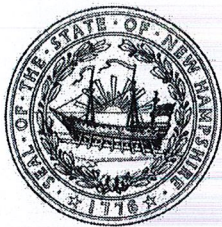
Payment Transaction #: **20239970018690001**

Approximately six (6) months prior to the expiration date above, a renewal form will be sent to the address you provided. It is incumbent upon you to keep us informed of address or email changes to ensure the renewal form reaches you. There is no charge for address changes.

Please visit our website for helpful information regarding all your business needs.  
If you require assistance or should you have any questions, you may contact the Corporation Division using the information provided below.  
Please reference your Business ID in your communication.

Thank you,

New Hampshire Department of State  
Corporation Division



# State of New Hampshire

## Department of State



Accepted Date: **03/22/2023**

Business Name: **USA ENERGY**

Principal Office Address: **812 Pinellas St, Clearwater, FL, 33756, USA**

RE: Acceptance of Trade Name Registration

This letter is to confirm the acceptance of the following Trade Name Registration:

Business ID: **923261**

Filing #: **6165197**

Expiration Date: **03/02/2028**

Effective Date: **03/02/2023**

Payment Transaction #: **20239980718902001**

Approximately six (6) months prior to the expiration date above, a renewal form will be sent to the address you provided. It is incumbent upon you to keep us informed of address or email changes to ensure the renewal form reaches you. There is no charge for address changes.

Please visit our website for helpful information regarding all your business needs.  
If you require assistance or should you have any questions, you may contact the Corporation Division using the information provided below.  
Please reference your Business ID in your communication.

Thank you,

New Hampshire Department of State  
Corporation Division



Puc 2006.02(h)(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?

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.

**The same question came up on our NJ and Maine applications and here is the explanation given to both PUCs Oct 2022 for NJ and Nov 22 for Maine. Both were satisfied and both licenses were approved. Earlier licenses were granted with this information presented or available both before and after MD. We were licensed before this in IL, MA and OH. And have since been granted electricity licenses in PA, TX, along with OH and PA natural gas licenses. Just MD had a problem at the time.**

The Maryland PUC sent a letter denying without prejudice a USAG an electricity broker's license on Jan 31, 2018 based on one person in our company. (portions of the letter are below)

Their denial explanation had two main points of concern. A website advertising point. And an FTC civil case Mr. McDaniel was part of some years earlier. (Not related to utilities or energy in any way.) The FTC placed a 10-year ban on certain types of business for all parties involved in the case. (shown below.)

The advertising point was the fact that our USAG website at the time showed Maryland as a state where discounted service was available. That was an overlooked and unknown under the hood sitemap SEO item from the webmaster that we removed during the application process when it was pointed out. But it still scored against us.

There were also many emails and phone calls back and forth with a lawyer representative of the commission. It was offered that Brent be present at the commission meeting in case there might be questions. Nothing mandatory. And as we hadn't had any problem getting licensing in other states there wasn't an indication that an appearance was necessary after talking with the go between attorney representative and any questions were fed to us by phone/email. The phone calls weren't recorded. We do have lots of emails. Once denied, we were told of an appeal process well after the denial, but too much time had passed for one to be accepted. (It had to be done between 30 or 60 days.) So, we just moved on to getting licensing in other states.


The FTC case at the time (2012) was hard hitting and overreached in their attempt to punish and ban. (At the time they were targeting companies of this type – mortgage rescue companies.) The judge explained in the final court case filing over many pages that the proposal infringes unnecessarily on the defendants. They were found not civilly liable for operating a scam but deceptively marketing a service. And how the business helped many homeowners... he clarified specifically it was an overkill and which businesses the injunction applied to, and they shouldn't be disproportionately punished. The court specifically stated what type of businesses and the length of injunction. The 10-year injunction was ordered 8 June 2012 and has since expired. There is no injunction in effect.

We have all the documents marked up for easy reference but trying to stick to a simple detailed explanation. And so, here are the parts mentioned inserted here:

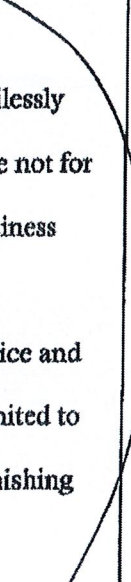


### III. Duration

The FTC proposes a perpetual injunction; the facts warrant a ten-year injunction. Citing *United States v. Grant*, 345 U.S. 629, 633 (1953), and finding that



Time and again throughout the litigation, the FTC has portrayed the defendants as criminals who operated a fraudulent business that preyed mercilessly on vulnerable homeowners. However, the defendants were found civilly liable not for operating a scam but for deceptively marketing a service. The defendants' business helped many homeowners reduce a monthly payment and save a home from foreclosure. Prohibiting the marketing and sale of a debt-relief product or service and the telemarketing of a financial product or service, an injunction prudently limited to ten years, protects consumers without unnecessarily or disproportionately punishing the defendants.



### IV. Injunction




The defendants are enjoined for ten years as follows:

#### *B. Prohibitions*



The defendants shall not (1) market or provide or assist a person in marketing or providing a debt-relief product or service; (2) telemarket or assist a person in telemarketing a financial product or service; (3) attempt to collect, sell, or assign a right to collect money from a consumer who agreed to purchase a mortgage-assistance product or service from the defendant or an other defendant.



ORDERED in Tampa, Florida, on June 8, 2012.

*Steven D. Merryday*

**STEVEN D. MERRYDAY  
UNITED STATES DISTRICT JUDGE**

Here is the MD denial letter. You can see that we were considered pretty well but for the two points mentioned above, each which exacerbated the other leading to denial.

The highlights are marked. Also, In the letter, the commission stated the 10-year ban as starting on April 2013, however the filed court document that started the ban was ordered and filed in June 2012 and it is over.

COMMISSIONERS

W. KEVIN HUGHES  
CHAIRMAN

MICHAEL T. RICHARD  
THONY J. O'DONNELL  
JOGWU OBI LINTON  
WINDY L. HERMAN

STATE OF MARYLAND



**PUBLIC SERVICE COMMISSION**

#7, 1/31/18 AM; ML#s 214762 and 215090  
License Reference No.: IR-3849

January 31, 2018

John Brent McDaniel  
Utility Services Advisory Group, Inc.  
812 Pinellas Street  
Clearwater, FL 33756

Dear Mr. McDaniel:

On April 21, 2017, Utility Services Advisory Group, Inc. ("Company") filed an Application for a License to Supply Electricity or Electric Generation Services in Maryland under COMAR 20.51. The Company proposes to provide electricity supplier services in Maryland for residential, commercial and industrial customers as described in the application. Additional information was filed on May 9, 2017.

After considering this matter at the January 31, 2018 Administrative Meeting, the Commission denied the Company a license to operate as an electricity supplier in Maryland, without prejudice.

By Direction of the Commission,

A handwritten signature in black ink, appearing to read "David J. Collins".

David J. Collins  
Executive Secretary



**Here are additional excerpts from the rejection letter attachments:**

### **Compliance**

The Company submitted an Affidavit of General Compliance attesting that the Company agrees to comply with all applicable Federal and State consumer protection and environmental laws and regulations. The Company was formed in Florida and is in good standing to transact business in Maryland.

### **Technical and Managerial Competency**

USAG currently provides electricity broker service in Massachusetts and Ohio and electricity broker or supply service in Illinois. The Company's management has experience in the energy industry.

### **Training and Marketing Materials**

The Company submitted confidential training and marketing materials in a filing with Mail Log No. 214762. Staff has reviewed these materials and sees no obvious concerns.

### **Complaints/Enforcement Actions**

USAG operates as a supplier or broker in Illinois, Massachusetts, and Ohio. No complaints were filed against USAG in any of these three States over the past 12 months, and none of the three States has initiated an enforcement action against USAG. The Better Business Bureau has no record of complaints against the Company.

Staff recognizes the Company's satisfactory complaint record and the safeguards that the Company has established to prevent future acts of deceptive marketing by USAG. However, given the severity of the misrepresentations by WDR regarding the mortgage modifications, and Mr. McDaniel's central role as a partner at WDR, Staff is not convinced that the public interest would be served by approval of the application. Furthermore, Staff's concerns are exacerbated by the fact that USAG's website indicates that USAG operates as a supplier in Maryland. Therefore, Staff recommends that the Commission deny USAG's application.

**In a nutshell. Mr. McDaniel was part of an earlier company with the violation and the injunction, not related to any business that USAG does, is complete anyway. Nobody else in USAG was part of the FTC case. USAG erred in listing MD on some buried webpages created by a webmaster at the time to help with SEO, and which were removed as soon as it was pointed out by the MD commission.**

**Puc 2006.02(i)**

**Please list other states or jurisdictions in which the applicant currently conducts business relating to the aggregation of electric customers.**

Note: None of these other states call us an aggregator. Broker is the general term. This is a list of states where we are licensed as a broker.

**There are no states where we do aggregation of electric customers.**

**States where we act as an electricity broker. (Sales only, no customer service or billing.)**

**Vast majority of volume: IL, MA, ME, NJ, NY, OH, PA, TX**