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VIA E-FILING

April 2, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Name / Entity Change Request – Response to Staff Inquiry
FirstEnergy Solutions Corp. (Electric Generation Supplier License No. A-110078)

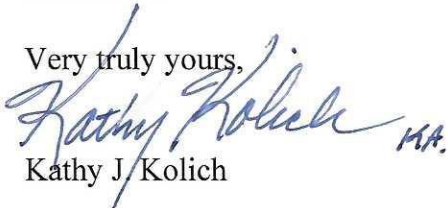
Dear Secretary Chiavetta:

On February 27, 2020, FirstEnergy Solutions Corp. (“FES”) emerged from Chapter 11 bankruptcy under a new name, Energy Harbor LLC (“Energy Harbor”). On March 23, 2020, Energy Harbor filed with the Commission a Name / Entity Change Request in which it asked the Commission to change the name on FES’s license (License No. A-110078) to Energy Harbor LLC.

As a supplement to the aforementioned filing, enclosed please find a summary of Energy Harbor’s technical competence in the electric industry, which is in response to an inquiry by Staff.

Should you have any questions/concerns about the enclosed information, please do not hesitate to contact me.

Very truly yours,



Kathy J. Kolich

CC D Mumford (via email)
K Brown (via email)
S Jakab (via email)
J McCracken (via email)

Energy Harbor LLC (License A-110078)

Request for Name Change

Response to Staff Inquiry

Energy Harbor LLC (“Energy Harbor”, f/k/a FirstEnergy Solutions Corp. or “FES”) is an electric generation supplier (“EGS”) in Pennsylvania (License No. A-110078). In addition to Pennsylvania, Energy Harbor is certified or licensed to provide competitive retail electric service to customers in Ohio, Illinois, Michigan, Maryland, Delaware, and New Jersey. Energy Harbor is one of the largest electric generation suppliers in the country to commercial, industrial, and governmental aggregation customers.

Importantly, in those states in which it sought and obtained certification/licensure as a competitive retail electric supplier, Energy Harbor/FES was never compelled by any regulatory agency to surrender or rescind its license/certification, nor was it ever ordered to conditionally rescind or suspend its license/certification. As a retail electric supplier in the foregoing states, Energy Harbor/FES maintained regulatory compliance with applicable rules and regulations governing such activities.

Below is a brief description of Energy Harbor’s operational and technical competence involving the generation and sale of electricity:

Generating Operations:

Energy Harbor is a financially secure independent power producer and fully integrated retail energy provider focused on safe and best-in-class operations and financial performance. With a fleet of reliable generating resources, including substantial carbon-free generation, Energy Harbor is well positioned for long-term value creation and competitiveness in a low-carbon future and is focused on enabling a growing customer and stakeholder base to meet their environmental, social and sustainability goals. The aforementioned competitive generating fleet provides more than 6,800 megawatts of capacity annually, with nearly 60 percent of electric generation coming from carbon-free nuclear plants.

Although Energy Harbor has operated in the retail energy market space for over two decades, Energy Harbor will constantly strive to improve its operations and engage in extensive oversight to ensure full regulatory compliance. Energy Harbor continues to dedicate significant resources toward quality, oversight, and regulatory compliance. In an effort to improve and enhance its existing services, Energy Harbor’s policies and procedures will continue to evolve and be adjusted, as needed, based on response to customer feedback, regulatory agent feedback, and changes in regulatory compliance requirements and technology.

Technical Expertise:

Headquartered in Akron, Ohio, Energy Harbor is a leading energy services company and a retail marketer of electricity. Energy Harbor is managed by a team with decades of experience in the energy industry. The operations expertise of Energy Harbor's managerial and technical expertise and experience is second to none. Energy Harbor's personnel possess extensive and in-depth experience providing retail electric service to customers throughout Pennsylvania and in the other competitive retail electric markets in which Energy Harbor operates, previously operated, or intends to operate in the near future. As such, Energy Harbor's management is intimately familiar with the competitive retail electric market, including the technical, managerial, operational, and regulatory compliance requirements.

Energy Harbor has access to services, support and oversight for day-to-day technical, managerial, and operational activities; accounting and finance services; general management services; risk management services; transaction related services; power supply procurement and portfolio management services; hedging of load requirements and supply resources; logistics management and coordination activities; compliance with state regulatory directives; wholesale counterparty credit administration; and the maintenance of all systems necessary to coordinate with transmission providers and local distribution utilities. Energy Harbor's primary goal and expectation is to be a responsive, knowledgeable partner who can help customers navigate the complex rules and regulations of energy markets while providing superior, timely, reliable, and responsive customer service.

Key Technical Personnel:

Name: Alin C. Baciu
Title: Manager, Load Forecasting
Phone Number: 330-315-7352
Email: abaciu@firstenergycorp.com (until May 2020);*
abaciu@energyharbor.com (post May 2020)
Background: Please see attached resume.

Name: Benjamin L. Kelly
Title: Analyst & Trader, Wholesale Transactions, Commercial
Operations
Phone Number: 330-315-6906
Email: blkelly@firstenergycorp.com (until May 2020);*
blkelly@energyharbor.com (post May 2020)
Background: Please see attached resume.

* Energy Harbor is utilizing the FirstEnergy servers and systems until they can be transitioned to Energy Harbor's IT infrastructure and properly tested.

ALIN C. BACIU

Master of Financial Mathematics

2100 Nottingham Dr • Hinckley, OH 44233 • (440) 781-5348 • abaciu@firstenergycorp.com

WORK EXPERIENCE

Energy Harbor LLC / FIRSTENERGY SOLUTIONS Corp. **Manager, Load Forecasting**

Akron, OH
2/2011 – present

- Lead a team of 5 analysts who mitigate the Company's exposure by providing next-day hourly demand forecasts for up to 50 delivery zones, individual industrial and large commercial customers, individual and aggregated residential customers, and ISOs
- Maintain forecast error MAPE below industry average
- Forecast next-day hourly DALMP by hub node and at generation unit
- Forecast next-day natural gas price forecast at hub (TECO, TETCO, HH)
- Predict PJM system wide pick demand, and coordinate with large industrial and commercial customers to reduce demand usage
- Use in-house developed and third-party Neural Network software (Artificial Intelligence) along with various statistical models to reduce forecast error, improve forecasting models and account for multitude of variables impacting the industry
- Improve daily forecast procedures to mitigate forecast variance, errors, system failure, streamline steps and reduce process time by 20%
- Manage the load budget process by generating, analyzing and explaining demand, rate, revenue and margin variances

Acting Manager, Forecasting and Analytics

7/2010 – 2/2011

- Lead cross-functional teams to better integrate short, medium and long term hourly demand forecasts and prices
- Quantify and communicate the impact of exponential growth of Retail and Wholesale sales by providing senior leadership with competitive market studies and forecasts
- Provide market analyses and other supporting studies for the FirstEnergy/Alleghany Energy merger
- Coordinate a corporate-wide system transfer to PCI, affecting the upload and bidding of short term demand, prices, nuclear and wind generation forecasts

Staff Business Analyst

5/2007 – 7/2010

- Develop 5-year forecasts of hourly demand and marginal price by company and customer type for all territories served by the Company
- Coordinate efforts among a cross-functional team to develop and maintain mid-month, next month, balance of year and next year consumption budgets and price forecasts
- Lead implementation and application of statistical and Neural Network models to next-day hourly demand forecasts, saving \$6 million annually over traditional methods

FIRSTENERGY CORPORATION

Business Analyst

Akron, OH
9/2004 – 5/2007

- Develop and maintain commercial tariff rates and schedules, hourly load forecasts for energy and revenue, variance reports and customer profiling
- Prepare and present testimony for Ohio and Pennsylvania rate cases
- Develop and validate detailed monthly billing data for 4.4 million customers in FirstEnergy's 7 utility companies
- Lead implementation of corporate-wide load research program to restructure hourly customer profiles by class and rate

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Master of Financial Mathematics

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WACHOVIA BANK Clemson, SC
Master's Project: "Credit Scoring Using Bayesian Networks" 8/2003 – 5/2004
• Developed algorithm to determine issuance of personal lines of credit

CLEMSON UNIVERSITY Clemson, SC
Graduate Teacher of Record, Business Calculus 8/2002 – 5/2004
• Earned excellence in teaching award

EDUCATION **CLEMSON UNIVERSITY** Clemson, SC
Master of Mathematical Sciences, Financial Mathematics (3.40 G.P.A.) 5/2004

BALDWIN-WALLACE COLLEGE Berea, OH
B.S., Mathematics and Business Administration (3.22 G.P.A.) 5/2002

EDGEHILL UNIVERSITY Ormskirk, England
Study Abroad Program in Mathematics 1/2000-5/2000

RELEVANT COURSEWORK

- Linear Programming
- Stochastic Processes
- Real Estate Finance
- Management Science
- Matrix Analysis
- Computational Finance
- Management Strategy and Policy
- Corporate Finance

COMPUTER SKILLS

- NeuralPower
- SAS
- Nostradamus
- Management Scientist
- MATLAB
- Visual Basic
- BRIO/Hyperion
- Microsoft Office

ADDITIONAL SKILLS

- Advanced multivariate modeling
- Neural Network models and analysis
- Short term and long term budget design and variance study
- Advanced stochastic calculus applications in finance
- Excellent communication, presentation, and project management skills
- Fluent in Romanian

REFERENCES

Available upon request

BENJAMIN KELLY

BENJAMIN KELLY

EDUCATION:

M.A. - Economics, The University of Akron, Akron, OH, 2004

B.A. - Economics, The University of Akron, Akron, OH, 2002

EXPERIENCE:

Energy Harbor LLC (f/k/a FirstEnergy Solutions Corp.), Akron, OH

Trader, Commercial Operations (August 2016 – Present)

- Responsible for short term wholesale transactions to support the generation and retail business.
- Hedge generation exposure to PJM spot market risk.
- Hedge load variation due to weather
- Forecast net open position on a daily basis
- Forecast next month open position and financial projection
- Track and analyze position and assist with developing strategic revisions as needed
- Analyze and communicate variances between budget, forecast, and actual
- Track hedge settlements
- Responsible for identifying and transacting on intra-month short term trading opportunities
- Develop and maintain standardized daily reports for position management and P&L forecasting and tracking
- Collaborate with and support various functional groups including Accounting, Risk Control and Settlements
- Coordinate with day-ahead and real-time operations to manage generation outages in conjunction with overall open position

Analyst, Commercial Operations (June 2011 – August 2016)

- Forecast next month open position and financial projection
- Track and analyze position and assist with developing strategic revisions as needed
- Analyze and communicate variances between budget, forecast, and actual
- Track hedge settlements
- Coordinate with day-ahead and real-time operations to manage generation outages in conjunction with overall open position
- Execute virtual bids and physical schedules in the RTO

Analyst, Commodity Risk Management, (June 2007 – May 2011)

- Responsible for development and maintenance of risk reporting on the FES unregulated business
- Maintain and update the ETRM system with forward price curves, delivery points, transactions and coordinate portfolio modeling with front, mid, and back-office.
- Monitor transaction exposure against Risk Policy limits