# Response to 2019 Joint Chairmen's Report on the Fiscal 2020 State Operating Budget (HB 100) and the State Capital Budget (HB 101) and Related Recommendations

Report of the Public Service Commission of Maryland

Prepared for the Senate Budget and Taxation Committee and House Appropriations Committee

**October 1, 2019** 

#### **Introduction**

In response to the 2019 Joint Chairmen's Report ("JCR") from the Senate Budget and Taxation Committee and House Appropriations Committee (collectively, "Committees"), the Public Service Commission of Maryland ("PSC" or "Commission") submits this Report addressing the Committees' interest in understanding more about the numbers and resolutions of consumer complaints related to energy suppliers in recent years. The PSC was requested to submit a report containing information for the following items for Fiscal Years 2014 through 2019:

- The number of complaints by energy supplier;
- The number of complaints related to energy suppliers that were closed without further investigation;
- The number of complaints related to energy suppliers with additional investigation/action;
- The average processing time for PSC review of energy supplier complaints, separately identifying processing times for complaints for which additional investigation is required and those screened out after initial review;
- The number of complaints related to energy suppliers that resulted in penalties, including refunds to customers or other actions, and information on the penalties issued to or refunds to customers, including the amount and the number of customers awarded a refund;
- The number of energy suppliers that have withdrawn from Maryland following a PSC investigation or a determination of a violation; and
- The number of energy suppliers that PSC has required to cease operations in Maryland following an investigation and, if no such orders have been made, what level/type of violation would be required to issue this type of penalty.

The Committees also requested information on the types of ongoing oversight by the PSC related to energy suppliers, including spot checks of marketing and contract materials. The PSC was requested to provide information related to current staffing for energy supplier oversight and the number of additional staff that would be required to provide additional, proactive oversight, including spot checking of materials, on a regular basis. The Committees further requested that the PSC provide information about the feasibility of posting the complaint data on the PSC's website and adjusting the website to provide more clear access to complaint forms.

# **Overview of the Consumer Affairs Division**

The Consumer Affairs Division ("CAD" or "Division") is the department within the PSC that educates consumers and investigates, responds to, and attempts to resolve complaints in accordance with applicable laws, Code of Maryland Regulations ("COMAR") Title 20, and utility-related tariffs for the following:

- Electric and gas utilities (no heating oil or propane);
- Third-party retail energy suppliers;
- Telephone companies (landline only); and
- Private water and sewer companies.

The Division is comprised of a Director, an Assistant Director, an Administrative Officer III, and three Administrative Specialists who handle complaints against suppliers as well as an Administrative Officer III and four Administrative Specialists who handle complaints not associated with suppliers. Two of the Administrative Specialists are bilingual in Spanish, allowing the Division to accept and investigate complaints filed by Spanish-speaking consumers. CAD investigators act as impartial intermediaries and attempt to resolve disputes between consumers and utility/third-party supplier companies.

In 2018,<sup>3</sup> there were approximately 2.6 million electricity customers and approximately 1.25 million natural gas customers in Maryland. About 438,000 residential customers were enrolled with electricity suppliers, and approximately 220,000 residential customers were enrolled with gas suppliers. Last year, CAD investigated approximately 2,696 consumer complaints against all companies.<sup>4</sup> The general breakdown of the complaints was as follows:

Subject Area	Number of Complaints
Gas and Electric	1, 842
Telecommunication	199
Water	52
Other/Non-Jurisdictional	43
Issues	

CAD investigated 1,842 complaints against gas and electric utility companies<sup>5</sup> and energy suppliers, primarily concerning billing issues and quality of service issues. Of these complaints, 651 were against suppliers of electricity or natural gas service. Most customer disputes against suppliers alleged one or more of the following: unauthorized enrollment (known as "slamming"), misrepresentation of company and/or contract terms, increase of variable rates, contract renewal, early termination fees, or general billing disputes.<sup>6</sup>

<sup>&</sup>lt;sup>1</sup> CAD began officially accepting complaints in Spanish in September 2018.

<sup>&</sup>lt;sup>2</sup> As part of the Commission's customer-facing interactions, CAD also regularly handles inquiries from customers concerning energy suppliers and their activities.

<sup>&</sup>lt;sup>3</sup> The information in this section is based on data that is reported by the calendar year.

<sup>&</sup>lt;sup>4</sup> A single complaint may have been assigned to more than one company/supplier code, complaint code(s), and company types. Consequently, the total number of complaints filed and the total number of issues or company types listed may not be equal.

<sup>&</sup>lt;sup>5</sup> The term "utility company" as used in this report refers to the local distribution company.

<sup>&</sup>lt;sup>6</sup> This information reflects the number and types of complaints filed with the Commission. It does not provide insight into the ultimate disposition of any complaint.

## **Overview of Consumer Affairs Division Complaint Investigative Process**

Each initial complaint that is submitted to the CAD is investigated if the complainant has provided sufficient information to identify the energy supplier against whom the complaint is filed. Chart 1, below, provides an overview of the CAD investigative process. In some instances, the complainant may not be able to positively identify the supplier, and/or the complainant's interaction with the supplier did not result in a contractual relationship. To assist the complainant, CAD representatives will attempt to determine which supplier was involved, to the best extent possible. However, no investigation can be conducted where a supplier cannot be identified.

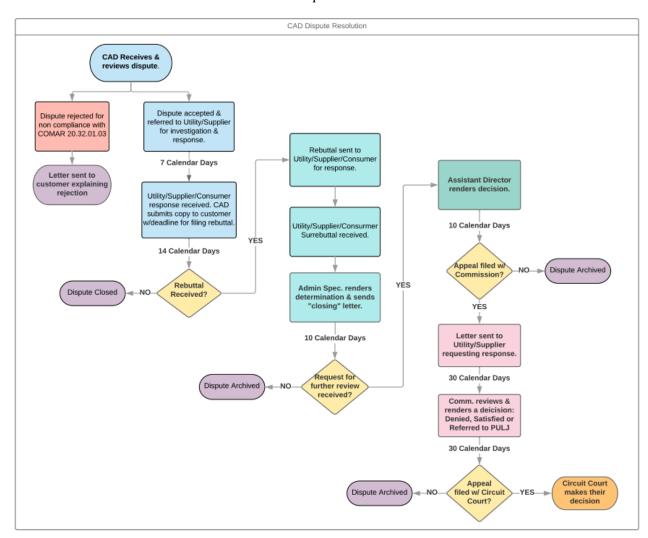


Chart 1. CAD Dispute Resolution Flow Chart

The Commission's customer informal complaint (or "dispute") process is governed under COMAR 20.32 and the Public Utilities Article, Md. Code Ann., § 3-102. This process applies to all complaints received by the Commission—against utility companies and energy suppliers alike. Upon receipt of a viable informal complaint or dispute against a supplier—i.e., a dispute that conforms with COMAR 20.32.01.03 requirements—the assigned CAD representative sends a

copy of the dispute to the identified supplier and requests a response.<sup>7</sup> The supplier, under COMAR 20.32.01.04, is required to "make a good faith attempt" to respond to CAD within seven business days of the dispute's submission. Upon receiving a response, the CAD representative sends the response to the complainant and provides the complainant with an opportunity to rebut the company's response with any supporting documentation/information.

The informal complaint/dispute is considered resolved/closed if no additional response is received from the complainant. It should be noted that a complainant may choose not to respond where a settlement has been reached with the supplier. If the complainant responds, the energy supplier is asked to provide an additional response. The CAD representative then reviews the information provided by both the supplier and the complainant. Based on this information, the allegations, and the applicable law(s) and regulation(s), the CAD representative will determine if a violation has occurred. A written decision is then mailed to the complainant and the supplier.

If either party is dissatisfied with the CAD representative's written decision, they may request a Further Review by the Assistant Director of CAD. The request must be filed within 10 days of the date of the CAD representative's written decision. If a request for Further Review is filed, the Assistant Director will notify the opposing party. The Assistant Director may request additional information from either the complainant or the energy supplier, as needed. The Assistant Director can either affirm the initial written decision or reverse the initial decision. Either party may appeal the Assistant Director's decision to the Commission within 10 days of the date of that decision by filing a Formal Complaint with the Office of the Executive Secretary.

If either party files an appeal of the Assistant Director's decision, the Office of the Executive Secretary issues a "satisfy or answer" letter to the party not filing the appeal. The Commission's Office of General Counsel then handles the matter as a Formal Complaint. The Commission may render a written final decision based on the record that has already been developed during earlier stages of the investigation. Alternatively, if the Commission finds the record incomplete, the Commission may direct the respondent (or in some cases the complainant) to provide additional information, or the Commission may initiate a proceeding to further investigate the matter. If the Commission determines that further evidentiary proceedings are necessary, the Commission will delegate the matter to the Public Utility Law Judge ("PULJ") Division for an evidentiary proceeding. In the event a matter is delegated to the PULJ Division for an evidentiary proceeding, the assigned PULJ will issue a Proposed Order, which becomes a final order of the Commission unless it is appealed to the Commission within 30 days. Final Commission decisions in these matters include a notice of the parties' appeal rights, indicating that a party who is dissatisfied with the decision has the right to appeal the decision to the circuit court within 30 days of the decision.

<sup>&</sup>lt;sup>7</sup> The utility company is engaged as a third party for the purpose of monitoring the dispute given its collection responsibilities under its Purchase of Receivables program.

<sup>&</sup>lt;sup>8</sup> A settlement reached between the complainant and a supplier is not indicative of whether there has been a violation of applicable law(s) or the Commission's regulations. Disputes that have been settled are still subject to follow-up by CAD prior to closing the dispute.

<sup>&</sup>lt;sup>9</sup> The Office of General Counsel similarly reviews all Formal Complaints filed directly with the Commission under Public Utilities Article, Md. Code Ann., § 3-102.

## **Energy Supplier-Related Customer Complaint Data**

Below are data responses to each question posed in the JCR as modified for additional clarity and consistency with the Commission's dispute resolution process. Table 1 is a high level summary of the total number of viable complaints filed against suppliers for FY 2014 through FY 2019. The Appendix to this report includes the underlying data used to create Table 1, organized by the names of each supplier and listing the number of complaints filed each fiscal year, if any, against those suppliers.<sup>10</sup>

	FY2014 <sup>11</sup>	FY2015	FY2016 <sup>12</sup>	FY2017	FY2018	FY2019 <sup>13</sup>	Totals
Number of Complaints	2169	1120	590	525	554	703	5661

Table 1. Number of Supplier-Related Complaints

### **Energy Supplier Investigations by the Numbers**

Table 2 includes data for FY 2014 through FY 2019 that reflects the number of initial complaints related to energy suppliers that were closed upon completion of initial investigation and no request for Further Review was filed. Table 2 also reflects the number of supplier-related complaints that involved additional investigation/action—i.e., escalated complaints—following a request for Further Review.

<sup>&</sup>lt;sup>10</sup> The number of complaints listed for each supplier is neither a measure of the complaint's validity nor indicative of a valid disposition.

<sup>&</sup>lt;sup>11</sup> The Commission received a significantly high number of complaints in the years following the 2012 derecho storm and following the 2013-2014 polar vortex.

<sup>&</sup>lt;sup>12</sup> On February 10, 2016, the Commission adopted revisions to COMAR 20.32, 20.51, 20.53, and 20.59 concerning competitive electricity and gas supply, which included, *inter alia*, enhanced customer protections. *See* Rulemaking ("RM") 54, *Revisions to COMAR 20.32*, 20.51, 20.53, and 20.59—Competitive Electricity and Gas Supply (hereinafter "RM54").

<sup>&</sup>lt;sup>13</sup> Prior to May 2018, CAD's complaint database allowed a customer to file disputes against multiple suppliers as a single complaint. The database has since been modified to require that customers file complaints against multiple suppliers as individual complaints, which are separately tracked.

Table 2. Number of Initial and Escalated Complaints by Fiscal Year

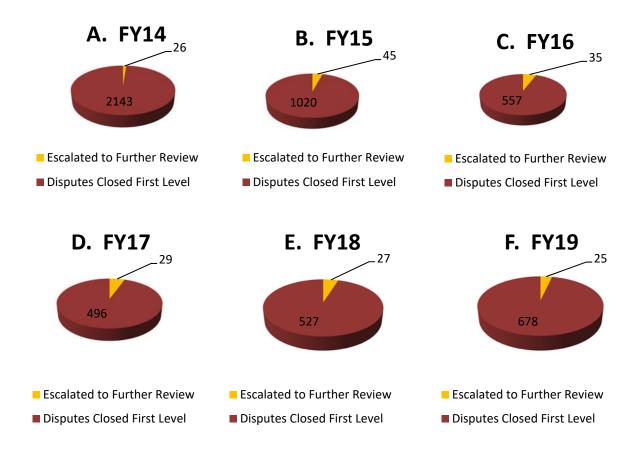


Table 3 reflects the aggregate number of appeals for each escalated complaint from FY 2014 through FY 2019 for which an appeal of the Further Review decision related to energy suppliers was filed.

Table 3. Number of Escalated Appeals from Further Review by Fiscal Year

Fiscal Year	Number of Appeals of Further Review Decisions
FY2014	4
FY2015	18
FY2016	17
FY2017	10
FY2018	5
FY2019	15

### **Energy Supplier Complaint Processing Time**

COMAR designates the timeline that the agency, consumers, and utilities/suppliers must adhere to in order to resolve the complaint process in a proactive, timely, and responsive manner.

Currently, the Division is unable to track the processing times specifically for supplier-related complaints, but can provide the average processing time for all complaints submitted and escalated. Table 4 reflects the percentage of complaints processed within 60 days, for both initial disputes closed without further review and disputes that were escalated for further review.

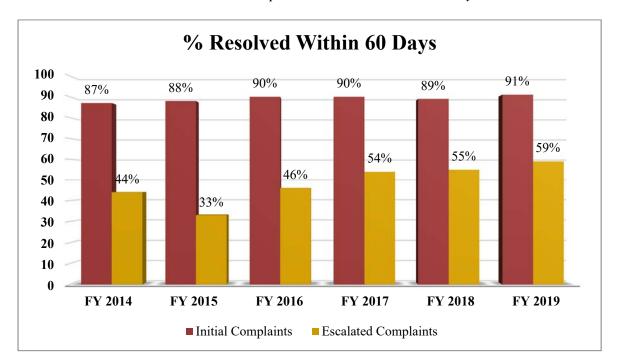


Table 4. Complaints Resolved Within 60-Days

#### **Customer Savings**

Table 5 summarizes data from FY 2014 through FY 2019 where customers received refunds or fee waivers in connection with a dispute filed with the Commission. This data includes the total number of complaints against suppliers that resulted in refunds or credits. CAD has required suppliers to issue refunds to customers as a result of COMAR violations. A refund may represent a rebate, an actual refund of overages, a rerate, a waiver of early termination fees, etc. Prior to the Commission's adoption of new consumer protections in 2016, <sup>14</sup> suppliers would send refunds directly to consumers, even if no payment was made on the outstanding bill. Suppliers would then report the matter settled with the customer's confirmation. This resulted in CAD having limited data regarding refund money paid to customers after a dispute was filed and CAD initiated its investigation. However, adoption of COMAR 20.53.07.05C(2)(a) (for electric suppliers) and COMAR 20.59.07.05C(2)(a) (for gas suppliers) required suppliers to issue any customer refund directly to the utility as a payment on the customer's account. Through CAD's effort, in 2018, Maryland customer complainants, for all complaints resolved through CAD, saved more than \$325,000 through bill credits, late payment fee waivers, reversal of charges, bill adjustments, or other waivable fees granted to customers as a part of the dispute resolution process.

<sup>&</sup>lt;sup>14</sup> See RM54, Office of the Executive Secretary, Rule Making Minutes from February 10, 2016 Rule Making Meeting (Feb. 25, 2016).

Table 5. Refunds Issued to Customers of Suppliers Pursuant to Customer Dispute

	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019
Number of Complaints	506	263	160	117	101	197
TOTAL <sup>15</sup> SAVINGS	\$220,100.15	\$133,229.23	\$192,474.82	\$163,684.88	\$75,688.59	\$80,776.20

### **License Cancellations and Withdrawals**

From FY 2014 through FY 2019, the Commission received 90 requests from suppliers to cancel their licenses. Table 6 reflects the number of energy suppliers that requested cancellation of their licenses to operate in Maryland. The Commission does not track the reasons why a supplier has requested cancellation of its license; nor can the Commission speculate whether a supplier's cancellation request is related to a CAD investigation or determination of a violation.

Table 6. Number of Energy Suppliers That Withdrew or Cancelled Their Licenses

Fiscal Year	Number of Energy Suppliers
FY2014	10
FY2015	19
FY2016	21
FY2017	8
FY2018	10
FY2019	22

#### **Civil and Other Penalties**

The PSC has initiated a number of investigations into questionable practices by third party suppliers. Table 7 reflects the number of energy suppliers that have been issued a civil penalty based on identified violations stemming from customer complaints and/or special investigations conducted by the Commission.

<sup>&</sup>lt;sup>15</sup>Total savings includes refunds ordered by the Commission as well as those refunds or waivers of termination fees that were given by a supplier in the interest of resolving the dispute.

Table 7. Number of Energy Suppliers That Received a Civil Penalty

Fiscal Year	Number of Energy Suppliers
FY2014	1
FY2015	1
FY2016	3
FY2017	1
FY2018	0
FY2019 <sup>16</sup>	1

Table 8 reflects the number of energy suppliers where the Commission has either placed a moratorium on a supplier's ability to enroll customers or suspended a supplier's license to operate in the State until the supplier came into compliance with the Maryland laws and regulations governing the supplier's operations in Maryland.

Table 8. Number of Energy Suppliers Suspended or Issued Moratoriums

Fiscal Year	Number of Energy Suppliers
FY2014	1
FY2015	0
FY2016	1
FY2017	0
FY2018	0
FY2019	1

Earlier this year, the Commission's Technical Staff ("Staff") filed complaints against five retail suppliers, alleging violations of the Commission's consumer protection regulations. On July 17, 2019, the Commission held a public hearing on the charges against one such company, Smart One Energy, LLC ("SOE"). The Commission docketed and delegated three other complaints against Direct Energy Services, LLC, U.S. Gas & Electric (d/b/a Maryland Gas & Electric), and Smart Energy, respectively.<sup>17</sup>

Subsequently, on August 2, 2019, the Commission suspended SOE's retail supply license, imposed civil penalties in excess of \$560,000, and returned SOE's customers to their default utility service. The Commission also directed SOE to issue refunds to the specific customers whose complaints formed the basis for Staff's complaint against SOE. SOE failed to respond to the Commission's order and notice of default. Therefore, the Commission revoked the company's license to operate as a retail supplier in Maryland and directed its surety bond proceeds, in the amount of \$250,000, be paid to satisfy the company's financial obligations to the Commission.

<sup>&</sup>lt;sup>16</sup> The Commission's investigation into Smart One Energy, LLC commenced in FY 2019 and continued into FY 2020.

<sup>&</sup>lt;sup>17</sup> The Commission dismissed the complaint against Atlantic Energy MD on July 12, 2019. The Maryland Office of People's Counsel has since filed a request for reconsideration of the dismissal, which is pending before the Commission.

#### **Additional Information**

### **Staffing**

In addition to CAD's oversight of the regulated complaint process, Staff's Energy Analysis and Planning Division reviews all supplier licenses (including applications and marketing materials) in coordination with the PSC's Staff Counsel Division. Staff and Staff Counsel also work together, with additional input from CAD, to bring enforcement actions against suppliers that are believed to be in violation of applicable laws and regulations. In addition to other duties, Staff has a Director, an Assistant Director, two regulatory economists, and an administrative aide who are tasked with reviewing supplier applications and updates to a licensee's information. Additionally, a member of Staff Counsel is assigned to review an individual supplier's license application and activity.

The Commission continually looks to assess its staffing needs across all of its Divisions. The Commission is committed to enhancing its supplier oversight function and will inform the General Assembly if additional staffing will be necessary to address any additional proactive oversight requirements.

## **Review of Marketing and Contract Materials**

Before an application is granted, Staff checks the retail supply license applicant's website to determine if there is any information that Staff believes violates Maryland law or regulation. The applicant, before it may begin operations in Maryland, must provide Staff and the Maryland Office of People's Counsel ("OPC") (if the applicant will serve residential customers) with copies of its marketing and contract materials for review. Staff will require modifications to the materials if they do not comply with or are in violation of Maryland law.

Additionally, COMAR 20.53.08.07(A) (for electric suppliers) and COMAR 20.59.08.07 (for gas suppliers) require third-party suppliers to report all planned door-to-door marketing to CAD. CAD has proactively created specific reporting data for suppliers to report in such a fashion as to allow for easier spot checking and verification as a part of the normal course of the investigative process.

#### Website Accessibility

The Commission believes the current locations of its complaint forms are readily and easily accessible. Access to the Commission's online complaint form is found on the home page of the Commission's website as the first item under "Consumer Tools," and the link is entitled "File an Online Complaint." Consumers may also reach the online complaint form from an additional section on the Commission's home page under "Online Services," located on the left hand side of the home page. All relevant complaint forms and FAQs have been translated into Spanish.

The Commission continues to identify the most practical data to provide to customers in the most user-friendly format. To this end, the Commission strives to make its website and online services more accessible to the public as it receives feedback. In fact, the Commission adds new functionality and services and/or makes revisions to its website on a continual basis. The Commission will continue to assess all critical feedback it receives regarding its complaint process and will update its website as required.

APPENDIX							
Supplier	No. of Initial Complaints Received Against Suppliers						
	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	Supplier
Allegheny NewEnergy Supply Company LLC	1	0	0	0	0	0	1
ACN Energy	2	0	0	0	0	0	2
Allegheny Energy Supply Company	1	0	0	0	0	0	1
AEP Energy, Inc. dba Blue Star Energy	0	0	0	2	0	2	4
Agera Energy LLC	0	0	0	1	0	0	1
Agway Energy Services, LLC	0	0	0	0	0	1	1
Ambit Northeast, LLC	46	43	41	14	8	7	159
U.S. Gas & Electrical (formerly American Power Partners LLC)	137	3	0	0	0	0	140
American Power & Gas of MD, LLC	0	0	0	0	0	1	1
AP Gas & Electric MD, LLC dba APG&E	7	4	1	2	3	2	19
Atlantic Energy MD, LLC	0	0	0	1	42	69	112
BG&ENERGY	0	0	0	1	0	0	1
BGE Home Products and Services LLC	10	11	4	5	5	6	41
BGE HP&S	0	0	0	1	0	0	1
Blue Pilot Energy, LLC	130	13	0	0	0	0	143
Castlebridge Energy Group, LLC	4	0	0	0	0	0	4
Constellation Energy Services, Inc.	0	1	0	0	1	1	3
Constellation Energy Gas Choice, LLC ("CEPC")	0	0	0	2	0	0	2
Constellation Energy Power Choice, LLC ("CEPC")	0	0	0	1	0	0	1
Champion Energy Services, LLC	3	6	9	13	4	5	40
Choice	0	1	0	0	1	0	2
Choice Energy LLC dba 4 Choice Energy	0	0	0	0	0	2	2
Choice! Energy Services	0	0	0	0	0	1	1
Clean Energy Options	3	4	0	1	0	0	8
Clean Choice Energy	0	0	0	4	5	5	14
Clean Current, LLC dba CCES, LLC	1	0	0	0	0	0	1
Clearview Electric dba Clearview Energy	29	7	2	19	22	17	96
Constellation New Energy, Inc	0	0	1	35	31	33	100
Constellation New Energy-Gas Division, LLC	0	0	0	0	9	7	16
Just Energy Solutions, Inc. (formerly Commerce Energy)	43	43	15	4	0	0	105
Consolidated Edison Solutions, Inc.	4	5	3	2	0	0	14
CON-NEW ENERGY	0	0	1	0	0	0	1
Constellation Electric	80	52	33	10	1	0	176
Constellation Energy	0	0	1	1	0	0	2
Constellation EP	0	0	4	0	0	0	4
Constellation-Gas	0	0	1	2	0	0	3
Direct Energy RS Gas	0	0	0	0	0	1	1

APPENDIX							
Supplier	No. of Initial Complaints Received Against Suppliers						Total by
Supplier	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	Supplier
Direct Energy Services, LLC	83	68	38	33	25	27	274
Discount Energy Group, LLC	3	1	2	0	0	0	6
Discount Power, Inc.	0	0	0	0	0	2	2
Dominion Energy Solutions, Inc.	4	4	1	0	2	1	12
Dynamis Energy Solutions, Inc	0	0	0	0	0	1	1
Eligo	0	1	0	3	0	2	6
Eligo Energy MD, LLC	0	0	0	0	0	5	5
Energy Plus Holding LLC	29	33	20	9	2	1	94
Energy Plus Natural Gas, LLC	0	0	0	1	1	0	2
North Eastern States, Inc. dba Entrust Energy	3	24	7	1	0	0	35
Ethical Electric Inc.	25	27	7	6	0	0	65
ENGIE Resources Inc.	0	0	0	0	0	1	1
Exelon Energy	0	0	0	1	0	3	4
First Energy Corp. (FES)	10	5	0	0	0	0	15
Gateway Energy Services Corporation	7	7	6	3	6	1	30
Glacial Energy of Maryland, Inc. & Glacial Natural Gas, Inc.	18	2	0	0	0	0	20
Great American Power, LLC	66	7	5	2	2	20	102
Greenlight Energy, Inc.	3	9	1	2	5	6	26
Green Mountain Energy Company	3	6	0	2	10	11	32
Direct Energy Small Business, LLC	1	0	0	0	0	10	11
HIKO Energy, Inc.	52	8	14	2	5	2	83
Hudson Energy Services, LLC	0	0	0	0	0	2	2
Horizon Power & Light, LLC	10	12	3	3	5	0	33
Hovey Energy, LLC	0	0	1	0	0	0	1
HP&S	0	0	1	0	0	0	1
Icetec Energy Services	0	0	0	0	0	1	1
IDT Energy, Inc	109	30	25	36	35	21	256
Interstate Gas Supply, Inc.	8	8	6	1	5	1	29
Inspire Energy Holdings LLC	0	5	3	3	6	10	27
Josco Energy USA LLC	0	0	0	0	0	14	14
Just Energy Solutions Inc.	0	0	0	2	5	17	24
Liberty Power Maryland, LLC	21	23	11	4	3	2	64
LifeEnergy LLC	0	0	0	0	4	11	15
Major Energy Electric Services, LLC	130	40	18	25	17	10	240
Major Energy Services, LLC	30	9	4	9	4	0	56
SouthStar Energy Services, LLC dba Maryland Energy	5	5	1	3	0	0	14
MDG&E	10	0	0	0	0	0	10
U.S. Gas & Electric dba Maryland Gas & Electric (MDG&E)	85	11	21	50	49	98	314
Metromedia Energy, Inc.	8	3	0	0	0	0	11
MidAmerican Energy Services, LLC	0	0	0	1	0	1	2

APPENDIX							
Supplier	No. of Initial Complaints Received Against Suppliers						Total by
Саррио	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	Supplier
Mid-Atlantic Aggregation Group dba MAAGIC	0	0	0	0	0	1	1
Maryland Natural Gas LTD	0	0	0	0	0	1	1
Mpower Energy NJ LLC dba MPE&G LLC	0	0	0	2	2	4	8
NRGing, LLC dba NetGain Energy Advisors	0	0	1	0	0	0	1
NextEra Energy Services, LLC	5	2	3	3	3	0	16
National Gas & Electric LLC	0	0	0	0	0	12	12
National Gas & Electric	0	0	0	2	13	6	21
North Eastern	3	0	0	0	0	0	3
Nordic Energy Services, LLC	0	0	1	0	0	0	1
North American Power and Gas LLC	50	40	4	7	14	14	129
NOVEC Energy Solutions, Inc.	7	3	3	2	2	2	19
Reliant Energy Northeast dba NRG Retail Solutions	0	8	7	7	4	11	37
Oasis Energy	44	43	16	18	26	9	156
Palmco Power MD, LLC dba Indra Energy	165	86	72	16	10	27	376
Park Power, LLC	0	0	4	1	0	0	5
Plymouth Rock Energy, LLC	17	1	1	0	0	0	19
Pepco Services, Inc. dba Pepco Services & Power Choice	0	0	0	0	0	1	1
Public Power & Utility of Maryland, LLC	48	11	7	5	3	8	82
Reliant Energy Northeast LLC	3	6	6	1	2	1	19
ResCom Energy, LLC	2	1	0	0	0	0	3
SaltHouse Energy Advisors, LLC	0	0	0	0	1	0	1
SFE Energy Maryland, Inc.	0	22	30	25	25	8	110
Shipley Choice LLC	0	3	4	0	0	1	8
SmartEnergy Holdings, LLC	0	0	0	0	6	30	36
SmartEnergy.com, Inc	0	0	0	0	0	2	2
Smart One Energy, LLC	25	24	10	16	22	22	119
Southeast Energy Consultants, Inc	1	0	0	0	0	0	1
Spark Energy LLC	13	17	6	19	9	30	94
Spark Energy Gas LLC	0	0	0	4	1	1	6
Tomorrow Energy Corp (formerly Sperian Energy Corp.)	0	3	3	2	8	8	24
Spring Energy RRH, LLC dba Spring Power & Gas	0	0	0	0	0	4	4
Sprague Energy Solutions, Inc	0	0	1	0	2	0	3
Spring Energy	0	0	1	2	1	0	4
Star Energy Partners, LLC	0	0	0	2	9	4	15
StateWise Energy Maryland LLC	0	0	0	0	0	1	1
Starion Energy PA, Inc	153	62	16	5	2	0	238
Stream Energy	9	16	8	8	6	10	57
Suez Energy Resources NA, Inc	0	0	0	1	0	0	1

APPENDIX							
Supplier	No. of Ir	Total by					
Supplier	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	Supplier
Talen Energy Marketing LLC	0	0	0	0	1	0	1
Engie Retail LLC dba Think Energy	1	0	1	5	10	2	19
Trident Retail Energy, LLC dba Trident Power	0	0	0	0	4	4	8
Town Square Energy East LLC	0	0	2	0	0	0	2
UGI Energy Services, Inc. dba UGI Energy Link	1	2	0	0	0	0	3
Unidentified Supplier Inquiry	0	0	0	0	5	6	11
Viridian Energy PA, LLC	107	46	6	2	1	2	164
Vivint, Inc	0	0	0	1	0	2	3
WGL Energy Services, Inc	134	109	37	31	22	11	344
XOOM Energy Maryland, LLC	157	74	29	15	17	17	309
TOTALS	2169	1120	590	525	554	703	5661