



Community Solar Subscriber Organization Registration Form

1. Legal Name of Registrant: Reliant Energy Northeast LLC
D/B/A or Trade Name (if applicable): NRG Home, NRG Retail Solutions, NRG Business Solutions

2. Address: 3711 Market Street, Suite 1000
City: Philadelphia State: PA Zip: 19104

Business Address in New Jersey (optional): 804 Carnegie Center
City: Princeton State: NJ Zip: 08540

Daytime Telephone Number: (609) 524-4500 Fax: ()
E-mail address: communitysolar@picknrg.com
Website URL: www.picknrg.com

3. Federal Tax Number: 32-0314140

4. Contact First Name: Angela Last Name: Schorr
Title: Director, Regulatory Affairs
Daytime Telephone Number: (516) 652-4254 Fax: ()
E-mail address: Angela.Schorr@nrg.com

*The Contact must be knowledgeable of the Registrant's operations and available to answer requests and inquiries from the Board during normal business hours.

5. Contact information for any parent company or other corporate entity with an ownership interest of 10 percent or more of the Registrant: (attach additional pages if necessary)
Legal Name: See ATTACHMENT A
D/B/A or Trade Name (if applicable):
Address:
City: State: Zip:
Daytime Telephone Number: () Fax: ()

6. Approximate number of people employed or contracted by the Registrant who will be working on matters related to community solar in New Jersey, and are physically based in New Jersey: ~ 13 (includes sales agents)
Total approximate number of people employed or contracted by the Registrant who will be working on matters related to community solar in New Jersey, including employees physically based both in and outside New Jersey: ~ 55 (includes sales agents)



7. Has the registrant, any senior officer of the registrant, or any corporate entity or individual with an ownership interest of 10 percent or more of the registrant ever been under investigation in New Jersey or any other state or federal jurisdiction, received any criminal or regulatory sanctions, filed a petition in bankruptcy or reorganization or been affiliated with any entity that has filed a petition in bankruptcy or reorganization? Yes No

If “Yes”, identify the entities or individuals subject to investigation or sanctions and provide a detailed explanation of the investigation or sanctions:

See ATTACHMENT B

8. Disclose any decisions or pending escalated regulatory actions in New Jersey or other states that affect the registrant’s ability to operate in New Jersey, such as suspension, revocation, bankruptcy, or limitation of operating authority:

N/A

9. List the types of services or products to be offered by the Registrant in New Jersey in connection with community solar: *(attach additional pages if necessary)*

The applicant is partnering with third parties to market community solar subscriptions to NRG's existing customers as well as new subscribers. This product may be bundled or offered along-side a special commodity supply offer, or may be purchased as a standalone product. The commodity supply offer will consist of preferred electricity supply pricing with options for electricity generated from renewable sources and a variety of term length and term-type offers.

10. The Registrant will be operating in the following Electric Distribution Company territories: *(check all that apply)*

- | | |
|---|--|
| <input checked="" type="checkbox"/> Rockland Electric Company | <input checked="" type="checkbox"/> Jersey Central Power & Light |
| <input checked="" type="checkbox"/> Public Service Electric & Gas | <input checked="" type="checkbox"/> Atlantic City Electric |



REN Community Solar Subscriber Organization Registration Form.pdf

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Created: September 07, 2022 13:29:30 -8:00

Pages: 9

Electronic Notary: Yes / State: TX

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E-Signature Summary

E-Signature 1: Leonard Bucky Gardner (LBG)

September 07, 2022 13:41:03 -8:00 [86888B6E23FD] [158.81.192.230]
bucky.gardner@nrg.com (Principal)

E-Signature Notary: L. Alvarado (LA)

September 07, 2022 13:41:03 -8:00 [4E48F60810C0] [158.81.192.230]
la@nrg.com

I, L. Alvarado, did witness the participants named above electronically sign this document.





Community Solar Subscriber Organization Registration Form Certification under oath

1. I, Leonard Gardner, hereby certify that I am the Vice President of the registered community solar subscriber organization Reliant Energy Northeast LLC and have been authorized to file this Registration Form and Certification on behalf of my organization.
2. I hereby certify that I have carefully examined all of the statements contained in this Registration Form and in the attachments hereto and made a part hereof, that I have knowledge of the matters set forth herein, that all statements made and matters set forth herein are true, correct, and complete to the best of my knowledge, information, and belief and that I know of no material omission. I am aware that submitting false or misleading information in connection with this Registration Form is ground for revocation of registration and may subject me, the registered community solar subscriber organization, and other responsible persons on behalf of the registered community solar subscriber organization to penalties of perjury, as well as to other civil or criminal penalties.
3. I hereby certify that the registered community solar subscriber organization agrees to comply with all standards, rules and regulations applicable to this registration, in accordance with N.J.A.C. 14:8-9 or as may be established by any applicable regulatory authority. I hereby certify that all individuals employed by the Registrant and who may conduct operations pertaining to community solar in New Jersey have been trained to comply with all applicable standards, rules and regulations prior to their commencing work pertaining to community solar in New Jersey.
4. I hereby certify that the registered community solar subscriber organization shall provide in a commercially reasonable manner such information as the Board or its Staff shall require in cases of dispute, compliance verification, or investigation.

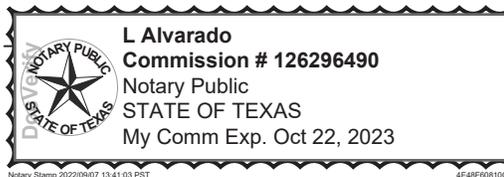
Dated this 7th day of August, 2022

Signature: Leonard Bucky Gardner
Signed on 2022/09/07 13:41:03 -8:00
 Signature
Leonard Gardner
 Name
Vice President
 Title

Signed and sworn to before me on this 7th day of August, 2022

Notary Public Signature: [Signature]
Signed on 2022/09/07 13:41:03 -8:00
 Name L. Alvarado

My commission expires:



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**Contact information for any parent company or other corporate entity
with an ownership interest of 10 percent or more of the Registrant**

Legal Name: NRG Energy, Inc.
D/B/A or Trade Name: N/A
Address: 804 Carnegie Center
City: Princeton State: NJ Zip: 08540
Daytime Telephone Number: (609) 524-4500



Legal Name: NRG Retail LLC
D/B/A or Trade Name: N/A
Address: 804 Carnegie Center
City: Princeton State: NJ Zip: 08540
Daytime Telephone Number: (609) 524-4500



Legal Name: RERH Holdings, LLC
D/B/A or Trade Name: N/A
Address: 804 Carnegie Center
City: Princeton State: NJ Zip: 08540
Daytime Telephone Number: (609) 524-4500



Legal Name: Reliant Energy Retail Holdings, LLC
D/B/A or Trade Name: N/A
Address: 804 Carnegie Center
City: Princeton State: NJ Zip: 08540
Daytime Telephone Number: (609) 524-4500



Legal Name: Reliant Energy Northeast LLC
D/B/A or Trade Name: NRG Home, NRG Retail Solutions, NRG Business Solutions
Address: 804 Carnegie Center
City: Princeton State: NJ Zip: 08540
Daytime Telephone Number: (609) 524-4500

Summary of U.S. and Canadian Legal and/or Regulatory Proceedings

Reliant Energy Northeast LLC is a wholly owned subsidiary of NRG Energy, Inc. ("NRG"). In the interest of full disclosure, certain NRG licensed retail entities have been the subject of formal and informal legal and regulatory proceedings, which are summarized directly below with more detailed explanations following. For information regarding NRG Energy, Inc.'s involvement in material litigation arising out of its participation in U.S. wholesale or retail energy markets, please see the Form 10-K and Form 10-Q filings which can be found at www.sec.gov, CIK# 0001013871 or <http://investors.nrg.com/financial-information/sec-filings>. Below are other proceedings that may not have been included in SEC filings for various NRG entities within the last 3 years.

- Direct Energy, LP has been the subject of legal and/or regulatory proceedings in Texas.
- Direct Energy Business, LLC has been the subject of legal and/or regulatory proceedings in Connecticut.
- Direct Energy Services, LLC has been the subject of legal and/or regulatory proceedings in Connecticut, Maryland, and Ohio.
- Energy Plus Holdings LLC has been the subject of legal and / or regulatory proceedings in Connecticut.
- Green Mountain Energy Company has been the subject of legal and / or regulatory proceedings in Pennsylvania.
- Reliant Energy Northeast LLC d/b/a Reliant Energy, NRG Business Solutions, Reliant-NRG, NRG Residential Solutions, NRG Retail Solutions, NRG Home and NRG Business ("NRG") has been the subject of legal and / or regulatory proceedings in Ohio and Pennsylvania.
- Reliant Energy Retail Services LLC (RERS) has been the subject of legal and / or regulatory proceedings in Texas.
- XOOM Energy Connecticut, LLC (XOOM) has been the subject of legal and / or regulatory proceedings in Connecticut.
- XOOM Energy Ohio, LLC (XOOM) has been the subject of legal and / or regulatory proceedings in Ohio.
- XOOM Energy Texas, LLC (XOOM) has been the subject of legal and / or regulatory proceedings in Texas.

New Jersey Related

The registrant's affiliate NRG Residential Solar Solutions LLC, which stopped marketing or leasing rooftop solar systems in February 2017, signed an agreement in May 2021 to resolve an inquiry initiated by the New Jersey Attorney General based on sales that took place prior to winding down operations. The AG alleged that certain deceptive sales practices had occurred. NRG did not admit wrongdoing but paid \$69,000 to resolve the matter and agreed to specific dispute resolution

Summary of U.S. and Canadian Legal and/or Regulatory Proceedings

procedures for certain customer complaints brought to its attention, and agreed to comply with certain specified business practices and disclosure obligations should NRG RSS resume rooftop solar sales in New Jersey.

Direct Energy, LP: Texas

In 2019, Direct Energy, LP, Bounce Energy, LLC, and First Choice Power, LLC received Notices of Investigation from the Public Utility Commission of Texas (PUCT) related to (1) violations of PURA § 39.101 and 16 Texas Administrative Code (TAC) § 25.474, relating to selection of retail electric provider and § 25.475, relating to general retail electric provider requirements and information disclosures to

residential and small commercial customers; and (2) violations of 16 TAC § 25.483, relating to disconnection of service. These separate investigations were combined by commission staff and, collectively, the parties agreed to pay an administrative penalty in the amount of \$250,000 under a settlement with Staff of the PUCT to resolve these allegations. The allegations were due to failure to modify a software system to correctly capture the rule requirements associated with enrollments made at retail locations, a delay in payment acknowledgements, and a policy related to the disconnection of customers after a second nonpayment (or bounced check).

Direct Energy Business, LLC: Connecticut

PUCT Docket 19-02-13

Date of Resolution: Ongoing

On February 11, 2019, the Public Utilities Regulatory Authority opened the above-referenced docket to consider whether to issue a declaratory ruling finding that the alleged supplier practice of altering the price of business customers' fixed-price contracts violated the Connecticut Unfair Trade Practices Act (CUTPA). After conducting the investigation, the Authority did not issue such a declaratory ruling but rather, in a letter issued on July 19, 2019, referred the matter to the Department of Consumer Protection and the Attorney General on the grounds that "the Authority has reason to believe that Direct's...increases to business customers' fixed-price contracts may violate state law." The conclusion of this matter has no immediate impacts on Direct Energy. It will be up to the Department of Consumer Protection, the agency with the primary authority to enforce CUTPA, to determine whether further action is warranted. If so, it can seek the assistance of the Attorney General in taking any further action against Direct Energy.

Direct Energy Services, LLC: Connecticut

PUC Docket 13-07-17

Date of Resolution: May 1, 2019

In June 2013, the Connecticut Public Utilities Regulatory Authority ("PURA") opened an investigation into the trade practices of three electric suppliers in the state, which included Direct Energy "(Direct)". The PURA alleged that it had received numerous customer complaints regarding billing, slamming and quality of service against Direct. In October 2013, Direct answered a series of interrogatories issued by the PURA. PURA staff and the Office of Consumer Counsel propounded additional

Summary of U.S. and Canadian Legal and/or Regulatory Proceedings

interrogatories in mid-2015, which Direct Energy has answered. After nearly six (6) years of regulatory review, PURA rendered a final decision in this proceeding in which in May 2019 that included a civil penalty of \$1.5 million, a prohibition of new residential sales for six months and a one-year marketing audit oversight process that concludes on November 17, 2020. As an outgrowth of the PURA final decision, Direct Energy has ceased sales via the door-to-door sales channel, instituted additional internal controls and enhanced its sales quality assurance and oversight process with the its Sales Quality Framework. The Sales Quality Framework is an internal audit control that regularly monitors our vendor/subcontractor sales and marketing activities for all applicable sales channels, i.e., web-based, door-to-door, outbound telemarketing, in-bound telemarketing, etc.

Direct Energy Services, LLC: Maryland

In May 2019, the Maryland PSC Staff filed a complaint against DES alleging DES committed fraud, engaged in deceptive business practices and violated the PSC's consumer protection regulations between January 2016 and June 2019. The Office of Peoples Counsel (OPC) then also filed a complaint alleging customer slamming and violations of the Maryland Telephone Solicitations Act (MTSA). The PSC issued an order in April 2021 approving a partial settlement of issues, and levied a \$125,000 civil penalty and refunds to 21 customers. Issues related to the MTSA were reserved for litigation. On January 14, 2022, the Public Utility Law Judge adjudicating the MTSA issues released a Recommended Decision that would have required Direct Energy to obtain signed written contracts for all future telephonic sales. Direct Energy filed a Notice of Appeal of the PULJ decision with the PSC on February 16, 2022. On May 4, 2022, the PSC issued a Final Order to resolve the MTSA issues. The PSC found that: Direct Energy did not engage in fraud or deceptive and misleading trade practices; no additional civil penalties are warranted; no additional customer refunds are warranted. In addition, reversing the PULJ, the PSC ruled that Direct Energy will be permitted to utilize the MTSA exemptions that enable customers to consent to enroll for commodity supply service verbally. The PSC also directed Direct Energy to, within 30 days, notify customers enrolled by phone during the 2016 – 2019 timeframe and explain that they must re-enroll, with consent provided in writing or electronically, in order to maintain service with Direct Energy. Customers that do not take action to re-enroll must be returned to utility provided default service. Direct Energy is currently assessing the need for further appeal.

Direct Energy Services, LLC: Ohio

In June 2021, the Public Utilities Commission of Ohio ("PUCO") issued a Notice of Probable Non-compliance to Direct Energy Services ("DES"), citing concerns with DE's compliance with marketing, sales, and enrollment regulations in Ohio. On June 10, 2022 DES and PUCO Staff signed a joint stipulation of settlement in the matter.

Energy Plus Holdings LLC: Connecticut

On September 30, 2020 - the Prosecutorial Division of the Connecticut Public Utilities Regulatory Authority, Office of Education, Outreach, and Enforcement ("Prosecutorial" or "EOE") and Energy Plus Holdings, LLC ("Energy Plus") filed a Settlement Agreement to resolve issues regarding compliance with Conn. Gen. Stat.

§ 16-245d regarding properly conveying supply summary information to the electric distribution companies for display on customer bills. This Settlement Agreement was

Summary of U.S. and Canadian Legal and/or Regulatory Proceedings

approved by the Public Utilities Regulatory Authority on November 4th, 2020 (Docket # 09-01-21). Energy Plus paid a civil penalty of \$282,200 to the State of Connecticut and will refund sixty-nine customers a total of \$5,888.50.

Green Mountain Energy Company: Pennsylvania

On February 24, 2022, the Pennsylvania Public Utility Commission issued a Final Order approving a Joint Petition for Approval of Settlement between the PUC's Bureau of Investigation and Enforcement ("PA BIE") and Green Mountain Energy Company ("Green Mountain") relating to sales and enrollment practices in Pennsylvania. PA BIE alleged that Green Mountain switched customers to its service

without proper authorization in certain instances. Green Mountain agreed to pay a civil penalty of \$156,000 (not inclusive of any customer refunds), along with certain injunctive relief, such as required reporting. See Docket No. M-2021-3009235 (available at: <https://www.puc.pa.gov/pdocs/1711074.pdf>).

Reliant Energy Northeast LLC: Ohio

On March 24, 2021, the Public Utilities Commission of Ohio adopted a Joint Stipulation entered into by Commission Staff and Reliant Energy Northeast LLC d/b/a NRG Business, NRG Home and NRG Retail Solutions ('NRG' or 'Company') to resolve concerns raised by Staff in a Notice of Probable Non-Compliance dated November 27, 2019 ('Notice Letter' or 'Notice'), which largely addressed alleged enrollment violations. NRG was able to demonstrate that its sales performance program and enrollment process are designed to minimize enrollment errors and incentivize compliant sales agent behavior, as reflected in the Company's very low complaint to sales ratio. The Stipulation is not an admission or a finding of liability and represents a reasonable compromise between the parties, including forfeiture of a civil penalty. See Case No. 20-1758-GE-UNC.

Reliant Energy Northeast LLC: Pennsylvania

On March 25, 2021, the [Pennsylvania Public Utility Commission](#) issued a Final Order approving a Joint Petition for Approval of Settlement between the PUC's Bureau of Investigation and Enforcement ("I&E") and Reliant Energy Northeast LLC d/b/a Reliant Energy, NRG Business Solutions, Reliant-NRG, NRG Residential Solutions, NRG Retail Solutions, NRG Home and NRG Business ("NRG"). The Settlement resolved issues related to an informal investigation initiated by I&E. I&E's investigation stemmed from informal complaints received by the Commission's Bureau of Consumer Services from residential customers related to the unauthorized enrollment of their accounts by NRG, several of which were self-reported by NRG to PUC Staff. I&E Staff was satisfied with NRG's sales performance program and was unable to identify any improvements to NRG's sales quality assurance program. Although NRG disputes or disagrees with the allegations levied by I&E, it agrees to the settlement terms as a compromise, including payment of a civil penalty. See Docket No. M-2020-3006647.

Reliant Energy Retail Services LLC: Texas

On July 13, 2020, Staff of the Public Utility Commission of Texas (the "PUCT") and Reliant Energy Retail Services LLC ("RERS") entered into a Settlement Agreement to resolve and conclude PUCT Staff's investigation of RERS relating to maintaining and

Summary of U.S. and Canadian Legal and/or Regulatory Proceedings

producing authorization of verification and energizing customers on the agreed approximate start dates in accordance with PUCT rules. The Settlement Agreement is filed in PUCT Docket No. 51045 (available at: http://interchange.puc.texas.gov/Documents/51045_1_1075201.PDF). The settlement was approved by the PUCT.

XOOM Energy Connecticut, LLC: Connecticut

CT PURA, Docket No. 18-12-22. Suppliers in Connecticut are obliged to provide the supply rate for a customer's upcoming bill cycle to the local distribution utility for

placement on a customer's bill. Due to widespread technical issues with the implementation of this requirement, the Public Utilities Regulatory Authority authorized suppliers who were found to be incorrectly conveying "next cycle rate" information on customer bills to participate in a voluntary amnesty program to remedy past issues. XOOM Energy elected to participate in this program and reported on its status. PURA thereafter audited certain customer bills and found additional issues. As a result, XOOM revised its amnesty plan and agreed to provide refunds in the amount of \$154,150 [Note: refund not penalty] to 3,261 customers. PURA accepted the plan and did not impose any civil penalty.

XOOM Energy Ohio, LLC: Ohio

In June 2021, the Public Utilities Commission of Ohio ("PUCO") issued a notice of probable non-compliance to XOOM Energy Ohio, LLC ("XOOM Energy"), citing concerns with XOOM Energy's compliance with marketing, sales, and enrollment regulations in Ohio. In April 2022, PUCO opened a formal investigation into these same issues. XOOM Energy is cooperating with the investigation, which remains ongoing.

XOOM Energy Texas, LLC: Texas

On October 16, 2019 Staff of the Public Utility Commission of Texas (the "PUCT") and XOOM Energy Texas, LLC ("XOOM") entered into a Settlement Agreement to resolve and conclude PUCT Staff's investigation of XOOM relating selection of a retail electric provider in accordance with PUCT rules. The Settlement Agreement is filed in PUCT Docket No. 50102 (available at: http://interchange.puc.texas.gov/Documents/50102_1_1037759.PDF). The settlement was approved by the PUCT.