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August 22, 2025

Ms. Lisa Felice, Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Hwy.
Lansing, MI 48917

Re: MPSC Docket No. U-21965

Dear Ms. Felice:

Enclosed herewith for filing in the above-referenced matter, please find the Application of Wave Energy Michigan LLC for an Alternative Gas Supplier License.

If you have any questions regarding the enclosures, please do not hesitate to contact my office. Thank you.

Very truly yours,

Fraser Trebilcock Davis Dunlap & Cavanaugh, P.C.



Jennifer U. Heston

Enclosures

**ALTERNATIVE GAS SUPPLIER APPLICATION
FOR THE MICHIGAN PUBLIC SERVICE COMMISSION
RETAIL ACCESS PARTICIPATION AGREEMENT**

Public Act 634 of 2002 (Act 634), MCL 460.9 et seq., which became effective on December 23, 2002, requires an Alternative Gas Supplier (AGS) selling natural gas at unregulated retail rates in Michigan to obtain a license from the Michigan Public Service Commission (Commission). Transportation gas customers are outside the retail choice program.

<http://www.legislature.mi.gov/documents/2001-2002/publicact/pdf/2002-PA-0634.pdf>

Section 9b of Public Act 634 states:

- (1) An alternative gas supplier shall not do business in this state without first receiving a license under this act.
- (2) An alternative gas supplier shall maintain an office within this state.
- (3) The Commission shall assure that an alternative gas supplier doing business in this state has the necessary financial, managerial, and technical capabilities and require the supplier to maintain records that the commission considers necessary.
- (4) The Commission shall require an alternative gas supplier to collect and remit to state and local units of government all applicable users, sales, and use taxes if the natural gas utility is not doing so on behalf of the supplier.

A license can be obtained by satisfactory completion of this application form referred to as the Retail Access Participation Agreement. Information must be supplied prior to processing a license request. All terms and conditions must be adhered to by applicant as a condition of maintaining a license. The applicant's signature on this form attests to the accuracy of the information submitted and commits applicant to adhere to the attached terms and conditions as set forth in the Commission's orders in Case Nos. U-11915, U-13694 and U-17580.

Failure to provide accurate information on this form, to furnish any required supporting information including required affidavits or to comply with the attached terms and conditions can result in denial or revocation of a license.

After an AGS submits its application:

1. The Commission Staff (Staff) reviews the application and the AGS's Terms and Conditions Agreement submission and consults with any needed experts and the applicant before making a recommendation to the Commission for approval or non-approval of the license.
2. The Staff's review process time will vary depending on initial application contents, additional information requirements and necessary meetings with the applicant to validate proprietary documentation.
3. The Commission will issue an ex parte order approving the issuance of a license if it is satisfied that the application meets the licensing criteria.

PART I – FITNESS

| | |
|---|--|
| <p>1. Name, Michigan office address, phone and fax numbers, e-mail address and company website:</p> <p>Wave Energy Michigan LLC 40600 Ann Arbor Road East Ste 200 Plymouth Mi 48170</p> <p>(866) 802-9283 cs@waveenergyservices.com https://WaveEnergyServices.com/</p> | <p>6. Specify type of provider (utility, marketer, utility affiliate):</p> <p>Marketer</p> |
| <p>2. Name of contact person, phone number and e-mail address for this application process:</p> <p>Elaheh Daneshpanahi (732) 242-7880 Elaheh@WaveEnergyServices.com</p> | <p>7. Business affiliation (whether utility or other):</p> <p>Please see Confidential Attachment 2.</p> |
| <p>3. If principal place of business is outside Michigan, provide name, address, telephone number, and e-mail:</p> <p>Wave Energy Michigan LLC 377 Valley Road Suite 2520 Clifton, NJ 07013 (866) 802-9283 cs@waveenergyservices.com https://WaveEnergyServices.com/</p> | <p>8. FERC authorization type(s) and number(s) if applicable:</p> <p>N/A</p> |
| <p>4. Name, telephone number and e-mail of 24-hour contact person for customers:</p> <p>Customer Service Center 866-802-9283 CS@waveenergyservices.com</p> | <p>9. Broker’s name, address, telephone number, and e-mail (if applicable list all):</p> <p>N/A</p> |
| <p>5. Type of legal entity (Corporate, Limited Liability Company, Partnership, etc.): LLC</p> <p>a) Date and State legal entity was organized: 8/7/2024 MI</p> <p>b) Purpose for which the legal entity was organized: All lawful purposes including supplying services as AGS</p> <p>c) Please submit your certificate of Authority to Transact Business in MI (if Foreign Corp, LLC, LPC). Please see Attachment 1.</p> | <p>10. Please list past or future planned name changes (if applicable):</p> <p>N/A</p> |

11. State specifically whether the applicant, an affiliate or subsidiary of the applicant, or a predecessor in interest of the applicant, or an owner, shareholder, principal, officer, executive or director associated with the applicant ever:

- Misled a potential customer and thereby induced that potential customer to sign a contract; **NO**
- Defaulted on a contract; **NO**
- Did not abide by the terms of the contract; **NO**
- Exited the market due to the imposition of any energy related penalties or finings; **NO**
- Committed any violations of law or business ethics in connection with the provision of

energy or energy-related products and services anywhere in the United States that resulted in a criminal or civil conviction or agreement to pay a penalty including any settlement imposed by a court or administrative agency? **NO**

If the answer is yes to any of the above, please explain in detail. Subsequent violations must be disclosed within 30 days to the Michigan Public Service Commission.

12. **Please submit a separate legal affidavit**, signed by a corporate officer with proper authority, which shall attest to the competence of the company's employees to market natural gas as an AGS. **Please see attached.**

PART II – COMPLIANCE COMMITMENT

A supplier **must** demonstrate that it has the necessary technical and managerial capabilities to ensure adequate service to customers in Michigan. Please provide a complete summary of information covering the applicant's:

1. Corporate/Company history with Biographies of Key Personnel (this may include experience as a supplier of retail energy, including natural gas or electricity); **please see attached.**
2. All service quality and reliability issues:
 - The total number of customer complaints;
 - Any and all violations or failures to perform on customer contracts, obligations to sell, serve or otherwise provide gas to customers by the applicant or any predecessor or affiliate entity;
Please see attached.
3. Audited financial statements of the applicant for its two most recent fiscal years or other documentation, by affidavit, providing detailed factual data pertaining to applicant's financial standing. Please submit financials under separate cover if considered confidential;
Please see attached.
4. Please provide the means for the required \$100,000 bond or letter of credit to ensure adequate service to customers in Michigan. Draft language will be provided at a later date;
Wave Energy intends and has the means to provide surety bond to satisfy collateral and performance assurance requirements to ensure adequate service to customers in Michigan upon receipt of Commission's draft language.
5. Overview of business plan including risk management strategy or policy; please see attached.
6. Outline of staffing and procedures for responding to customer inquiries and customer complaints. **please see attached.**

PART III - COMPLIANCE COMMITMENT

By signing this application and providing the affidavit letter required in item 12 of this application, the applicant and its representatives (1) certify that the information provided herein is accurate and complete and (2) agree to abide by the provisions of this agreement including the Terms and Conditions for a Michigan alternative natural gas supplier.

Signature:  _____

Date: 8/19/2025

Name and Title: Elaheh Daneshpanahi General Manager

Date: _____

APPLICATION, SUBMISSION, AND LICENSE PROCESS:

1. The application may be downloaded in PDF or Word format. Responses to Part I may be attached or the Part I items may be reformatted by expanding the application and inserting responses.
2. The compliance commitment must be signed and dated as indicated.
3. The Staff will contact you via email or phone to acknowledge receipt of application. The Staff also will notify you regarding any clarifications or needed additional materials. Once the Staff determines that the initial application materials are complete, the Staff will meet with principals of applicant to cover and discuss Application Part II information.
4. The financial information that is regarded as confidential will be archived at the Commission.
5. Upon completion of the application process, the Staff will make a recommendation to the Commission regarding the license. Granting of the license is by Commission order.

Terms and Conditions

1. **Supplier contact information.** An AGS shall notify the Staff of any change in the AGS's name, corporate structure, Michigan address, telephone number, contact person or agent.
2. **Michigan office.** An AGS shall maintain a Michigan office. An AGS representative, toll free telephone number, e-mail address, and website must be made available at all times to enable customers to contact or make inquiry with the AGS.
3. **FERC authorization.** An AGS shall obtain any authorizations required by the FERC, including any authorization required by the FERC to become a natural gas retail marketer. An AGS shall notify the Staff within 30 days of any FERC determination regarding the AGS's provision of natural gas to retail customers.
4. **Business practices and ethics disclosure.** An AGS shall follow all state and federal laws, as well as Commission policies and practices that may be established. Violations of law or business ethics by an AGS, AGS's agent, affiliate or subsidiary of the applicant, or a predecessor in interest of the applicant, or an owner, shareholder, principal, officer, executive, or director associated with the applicant in connection with provision of energy or energy-related products or services anywhere in the United States that results in a conviction or acceptance of a penalty for said behavior must be disclosed to the Michigan Public Service Commission within 30 days of any conviction or penalty determined or imposed by a court or an administrative agency.
5. **Product/Service disclosures.** An AGS shall conform to all customer disclosure requirements set by the Commission under authority of Act 634.
6. **Product/Service marketing and contract practices.** An AGS shall ensure fair and truthful representation of all products or services provided under the gas customer choice program in Michigan.

7. **Customer enrollment and services.** Enrollment of customers in the Michigan retail access program shall strictly follow the procedures authorized by the Commission. Slamming (unauthorized switching) or cramming (unauthorized adding of additional products or services not requested by the customer) as outlined in subsections (2) and (4) of Act 634 constitute serious offenses in the enrollment process. An AGS shall not include or add products or services without authorization as outlined in Act 634 and shall conform to all state and federal laws and regulations regarding the retail sale of products and services.
8. **Termination of service to customer.** The delivery of natural gas is the sole province of the natural gas utility offering the gas customer choice program. Termination of service to a gas customer choice customer will be handled by the natural gas utility in conformity with all rules and procedures authorized by the Commission.
9. **Utility tariffs and rules of service.** AGSs shall comply with utility tariffs and rules of service established and authorized by the Commission or the FERC that are applicable to the AGS or its retail customers.
10. **Customer confidentiality.** Information obtained from a customer or a potential customer by an AGS or an agent of an AGS is to be held in strict confidence and shall not be disclosed unless disclosure of the information is necessary to service the customer or to verify the potential customer's credit information. In the event that a customer's or a potential customer's confidential information is disclosed to a third party for any purpose, the AGS shall ensure that the party to whom the information is disclosed is informed of the duty to maintain the confidentiality of such information in the future. Any other use of such confidential information is prohibited absent the express approval of the customer or potential customer. Solicitation for such approval shall not be commingled with other offers, contracts, or approvals.
11. **Customer data requests.** A customer shall have the right to obtain its own billing and natural gas consumption data that is in the possession of the AGS.
12. **Associated broker, aggregator, or marketer.** An AGS that relies on the services of brokers, aggregators, or marketers shall pledge a best faith effort to hold them in compliance with provisions of this agreement. AGSs shall supply the Staff with the address, telephone number, name of a contact, and business affiliation of any brokers, aggregators, or marketers used by the AGS.
13. **State taxes, fees and revenue collection.** An AGS shall collect and remit all applicable state taxes, fees, and charges levied on energy suppliers as a class of business providers, including those fees and charges established by the Commission to implement and enforce this program, unless the natural gas utility is doing so on behalf of the AGS.
14. **Reporting.** AGSs shall provide statistical data regarding their retail sales and wholesale transactions to the Commission and its Staff upon request. The books and records of an AGS shall be made available by the AGS so that the Commission and its Staff may verify the accuracy of the statistical data.
15. **Posting Offers on [MI.gov/CompareMIGas](https://www.michigan.gov/comparemigas).** AGSs shall post rate offers to the Commission's website and are subject to the following procedures and requirements:
 1. All MPSC licensed AGSs will be issued a user-id and password, which permits each AGS to submit such information through a web-based interface.

2. The AGS is responsible for accurate and timely postings. The AGS will submit offers for posting as frequently as they become available. The AGS will be required to honor all uploaded pricing for residential and small commercial customers to the website. The AGS will expire all offers that are no longer available to customers. The AGS submitted offers will be limited to five per offer type per utility. The AGS will not offer a higher rate in the marketplace than what is posted on the website.
3. An AGS that is marketing to residential and small commercial customers must post to the website its generally available pricing offers for each type of offer available (i.e. fixed or variable) within each utility territory in which the AGS is marketing.
4. The AGS is required to populate all informational fields for each offer on the website.
5. Staff will act as a moderator of each AGS submission for posting. Staff will perform a cursory review of each submission for obvious errors before it becomes live on the website.
6. Each AGS will be required to provide its company logo in an acceptable format at the request of the MPSC Staff for inclusion on the website.
7. Staff will provide an AGS with timely notice and opportunity to cure any alleged violation of these Terms & Conditions, including the failure to report information or for reporting inaccurate information to the website. After timely notice and opportunity to cure, Staff may suspend AGS customer enrollments within the impacted utility service territory by filing a letter in the AGS licensing docket. Staff and/or the Commission will be able to remove a Staff-issued suspension. The Commission may impose consequences for continuous and/or repeated failures to abide by these Terms & Conditions. These consequences may include, but are not limited to:
 - i. Suspend AGS customer enrollments (per Commission order or Staff) within the impacted utility service territory.
 - ii. Revoke AGS eligibility (per Commission order) within the impacted utility service territory.

Failure to comply with any of these Terms and Conditions can result in revocation of an AGS license by the Michigan Public Service Commission.

Revised: September 2014
F-01



Form Revision Date 02/2017

ARTICLES OF ORGANIZATION
For use by DOMESTIC LIMITED LIABILITY COMPANY

Pursuant to the provisions of Act 23, Public Acts of 1993, the undersigned executes the following Articles:

Article I

The name of the limited liability company is:

WAVE ENERGY MICHIGAN LLC

Article II

Unless the articles of organization otherwise provide, all limited liability companies formed pursuant to 1993 PA 23 have the purpose of engaging in any activity within the purposes for which a limited liability company may be formed under the Limited Liability Company Act of Michigan. You may provide a more specific purpose:

Gas Supplier

Article III

The duration of the limited liability company if other than perpetual is:

Article IV

The street address of the registered office of the limited liability company and the name of the resident agent at the registered office (P.O. Boxes are not acceptable):

- 1. Agent Name: INCORP SERVICES, INC.
- 2. Street Address: 40600 ANN ARBOR ROAD EAST
 Apt/Suite/Other: STE 200
 City: PLYMOUTH
 State: MI Zip Code: 48170
- 3. Registered Office Mailing Address:
 P.O. Box or Street Address: 40600 ANN ARBOR ROAD EAST
 Apt/Suite/Other: STE 200
 City: PLYMOUTH
 State: MI Zip Code: 48170

Signed this 7th Day of August, 2024 by the organizer(s):

| Signature | Title | Title if "Other" was selected |
|--------------|-----------|-------------------------------|
| Kira Manning | Organizer | |
| | | |

By selecting ACCEPT, I hereby acknowledge that this electronic document is being signed in accordance with the Act. I further certify that to the best of my knowledge the information provided is true, accurate, and in compliance with the Act.

Decline Accept

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS**FILING ENDORSEMENT**

This is to Certify that the ARTICLES OF ORGANIZATION

for

WAVE ENERGY MICHIGAN LLC

ID Number: 803256400

received by electronic transmission on August 07, 2024 ***, is hereby endorsed.***

Filed on August 07, 2024 ***, by the Administrator.***

The document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 7th day of August, 2024.

Linda Clegg

Linda Clegg, Director

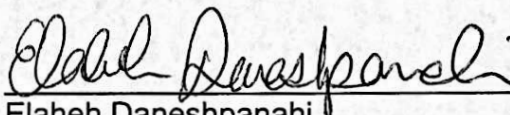
Corporations, Securities & Commercial Licensing Bureau

STATE OF MICHIGAN
PUBLIC SERVICE COMMISSION

AFFIDAVIT OF ELAHEH DANESHPANAHI

I, Elaheh Daneshpanahi, being duly sworn, depose and state that:

1. I am the General Manager of Wave Energy Michigan LLC ("Company") and, in that capacity, I am involved in the day-to-day operations of the Company.
2. I am authorized to make this statement of behalf of the Company.
3. I am familiar with and attest to the competence of the Company and the Company's employees to market natural gas as an Alternative Gas Supplier.
4. The Wave Energy, LLC financial statements included as Confidential Attachment 7 to the Company's Alternative Gas Supplier Application are true and accurate.




Elaheh Daneshpanahi
General Manager
Wave Energy Michigan LLC

Subscribed and sworn to before me

This 7th day of August, 2025

MEIR LIEBLICH
NOTARY PUBLIC, STATE OF NEW YORK
No. 01LI6346903
Qualified in Kings County
Commission Expires 08/22/2028


Notary Public

My Commission Expires 08/22

Elaheh Daneshpanahi

Elaheh Daneshpanahi is a seasoned professional in the energy sector with over a decade of experience, beginning her career in 2011. Specializing in the retail energy market and renewable energy, Elaheh has excelled in managing operations related to electricity and gas sales to residential and commercial customers across diverse markets including NY, NJ, PA, CT, MD, OH, DE, IL, and DC.

Her expertise spans billing, pricing, utility operations, Electronic Data Interchange (EDI), technical operations, energy forecasting, data analysis and reporting, agile software development, data warehousing and maintenance, residential and commercial solar project design, renewable energy credits and cost analysis. Elaheh has navigated complex regulatory environments, particularly in the PJM, NEISO, and NYISO markets, gaining valuable insights and expertise. Elaheh has increased operational efficiencies through a customer-focused approach coupled with creative technologies. Utilizing customer satisfaction surveys, clear marketing designs, and unique value propositions, Elaheh maintained highly compliant customer acquisitions as well as record high customer retention.

Currently serving as General Manager at Wave Energy, Elaheh has a track record of fostering strong client relationships, enhancing operational efficiencies, and leading high-performing teams to exceptional results. Previously, as CEO of S3G Energy and Director of Technical Operations at Mpower Energy, she demonstrated strategic leadership and operational excellence.

Professional Experience

Wave Energy, Clifton NJ

General Manager

2024 – Present

Define and execute corporate vision for retail gas market in California and Virginia.

- Define and execute corporate vision for niche gas market customers

- Expand customer markets to strategic deregulated gas markets
- Align team for scalable growth plans.
- Develop training and onboarding processes.

S3G Holdings, Brooklyn, NY

Chief Executive Officer

2023 – 2024

Managed full operations for two B2B entities, S3G Energy and Funding Forward. S3G Energy, an early-stage start-up, focuses on enhancing accessibility to renewable energy for commercial property owners. Meanwhile, Funding Forward, in its 4th year, provides financial consulting services, primarily aimed at maximizing tax benefits for SMBs.

- Redefined Funding Forward's mission and vision for scalability, aligning the leadership team accordingly.
- Enhanced internal operational efficiency, resulting in a 300% increase in EBIT.
- Successfully navigated Funding Forward through the end of ERC, surpassing expectations by achieving a perfect 100% file completion rate.
- Cultivated trust and alignment among employees, clients, and stakeholders, ensuring active engagement in the recovery process.
- Developed scalable operational frameworks for S3G Energy to support rapid growth while optimizing efficiency and cost-effectiveness.
- Implemented scalable technologies and automation solutions to drive sustained business expansion.
- Established strategic partnerships with energy vendors, enabling competitive pricing for new clients.

Mpower Energy, Brooklyn, NY

2011-2023

Director of Technical Operations-2017 – 2023

Reporting to the CEO, led a technical division comprised of 3 teams responsible for core operations of the company. Responsible for company-wide data analysis, reporting, software development, IT, EDI, processing, and support teams. Created effective user stories, specifications, designs, and implementation strategies for all proprietary technologies. Established the execution of robust IT maintenance and security strategies. Managed all billing activities by implementing electronic data interchange (EDI).

- Recognized twice by the CEO for exceptional leadership.
- Grew business into 7 states including five new PJM and ISO-NE markets.
- Facilitated WFH for 150 sales team during covid pandemic in 2020.
- Implemented 2 custom CRMs in under a year to enable efficient customer service and retention efforts.
- Defined SMART targets for each team and managed major projects with Agile methodologies.
- Used data modeling and visualization approaches to assess performance of various corporate operations.
- Evaluated internal processes and implemented procedural/policy modifications to enhance operations, including sales compensation plans, promotional requirements, process design, and software cycles.

- Designed and deployed 12+ applications to efficiently conduct over 100K transactions per month and optimize them based on EDI/Utility timelines.

Processing Manager-2015 – 2017

Supervised EDI, support, and processing teams to improve staff efficiency. Explored potential markets to achieve expansion targets. Recruited, trained, and oversaw clerical and administrative staff to develop operational expertise.

- Recovered 14% in revenue by developing robust plan and closely monitoring billing operations.
- Created and executed comprehensive organizational plan as well as reallocated resources.
- Coordinated with external development team to build custom software for company.

Operations Coordinator-2011 – 2015

Assessed and assisted variety of business initiatives, including sales, customer service, clerical, and support. Generated comparison reports for purpose of assisting with sales. Developed effective procedures for commission reporting, TPV, EDI, and enrollment. Researched and applied EDI requirements and policies.

- Saved business over \$5K in mismatched invoices.
- Ensured timely completion of client onboarding cycle leading to improved process and increased gross margins.
- Supported business in financial audit by IRS, provided relevant data, and collaborated with team of developers to recover lost data to successfully prove revenue and losses correctly.

Education

Bachelor of Science in Mathematics & Finance, CUNY Brooklyn College, Brooklyn, NY

Technical Proficiencies

Data Modeling | Agile | Data Analytics | SQL | EDI | Microsoft SQL Server | Tableau | Microsoft Office Suite | EMR systems | Google Suite | Jira | SDLC | Pivot Tables | R | AWS | Visio | MySQL | Scrum | Asana

John Moran

Customer Compliance & Retention Leader | Call Center & Sales Executive

Experience

Customer Compliance & Retention Manager - Wave Energy Services

Remote | Jan 2024 – Present

Direct compliance, quality assurance, and customer retention operations. Provide highly skilled handling of calls to ensure exceptional service delivery, regulatory adherence, and improved retention outcomes.

- Deliver expert call handling, setting the standard for professionalism and empathy in resolving complex customer inquiries.
- Build and lead a Quality Assurance program monitoring compliance, call performance, and customer satisfaction.
- Develop and implement retention scripting that strengthens client engagement and reduces cancellations.
- Serve as the primary escalation point for customer issues, ensuring rapid resolution and protecting company reputation.
- Launch a proactive welcome call program, establishing trust and improving long-term retention.
- Translate QA findings into training and coaching initiatives, driving continuous improvement across the service team.

Inside Sales Consultant - Head of Inside Sales - Super (hellosuper.com)

Remote | Mar 2022 – Feb 2025

Led and coached the inside sales team, developing inbound and outbound strategies, optimizing sales processes, and implementing tools to improve efficiency. Ensured customer satisfaction by addressing inquiries and complaints promptly.

Head of Call Center Sales (Inbound & Outbound) - Direct Energy / NRG / HWA

Montebello, NY | Mar 2008 – Sep 2021

Directed sales initiatives for Home Warranty of America and NRG Services, managing call center technology, partnerships, and personnel. Leveraged marketing methods to boost business growth and created strategies with external partners.

Director of Inbound & Outbound Residential Sales - Gateway Energy Services Corporation

2008 – 2013

Generated profitable customer growth in U.S. North and Alberta via inbound and outbound telesales. Collaborated with IT for reporting and systems development, while managing vendor relationships.

Education

Bachelor of Science in Organizational Management, Alliance University

Honors & Awards

- Multiple 'President's Club' Awards
- Multiple 'Top Elite Performance' Awards
- 'Sales Innovation Award'

BETH PERRY SEWELL
Quantum Gas & Power Services, Inc.
12305 Old Huffmeister Road
Cypress, Texas 77429
(281)664-2020

EXPERIENCE:*Feb. 2001 - Present***Quantum Gas & Power Services, Inc.***President & CEO*

- Develop and increase mid office operational client base
- Work with clients to ensure they receive maximum value for each dollar spent on mid office operations
- Continue to enhance the scope and capabilities of Quantum to expand the range of energy management service offerings to the client base
- Manage all aspects of the internal gas scheduling operations and staff

*May 1993 –Jan. 2001***Perry Gas Companies, Inc.***President & CEO*

- Structured a woman-owned business in a male dominated industry
- Transitioned sales downstream to burnertip customers in key de-regulated market areas while evolving the business away from wholesale trading
- Managed an operational staff whose goal was to maximize transportation capacity

*May 1992 – Apr. 1993***Hesse Gas Company***Supply and Marketing*

- Successfully marketed gas to large utilities in the northeast, mid-continent, gulf coast and western market regions under the women/minority diversity programs of the various utilities
- Effectively managed the mid office operational requirements

*June 1991 – Apr. 1992***Small Business Consulting**

- Identified and resolved small business inefficiencies, trained principals and employees in small business operations
- Installed various accounting software and trained clients in its operations

*Aug. 1989 –May 1991***Cartronics, Inc.***Co-owner and Business Manager*

- Created and grew a specialty automobile electronic shop based on “service first” that specialized in Class A electronic equipment
- Managed daily operations including cash flow planning, data management and designed just-in-time inventory controls
- Designed and implemented a marketing program resulting in a 200% increase in revenues during the second year

*May 1984 –Jul, 1989***Perry Management, Inc./Ventura Realty, Inc.***Vice President/Board Chair*

- Directed a project engineer to design a land use and development plan of a \$10 million project
- Led a professional team of legal and bond counsel to a successful approval of a \$1.5 million County Road District in Montgomery County, Texas
- Negotiated with lending institutions for adequate interim funding of the project

BETH PERRY SEWELL
Quantum Gas & Power Services, Inc.
12305 Old Huffmeister Road
Cypress, Texas 77429
(281)664-2020

Jan. 1982 -Apr. 1984

United Energy Resources, Inc.

Senior Financial Analyst

- Developed new computer planning models for internal reporting of all subsidiary and parent company financials to Senior Management and the Board of Directors
- Incorporated subsidiary reporting of quarterly, annual and five year budget and actual figures into planning models and created consolidations
- Developed reporting structures for Board level presentations

Aug. 1980 – Dec. 1981

United Texas Transmission, Inc.

Wholly owned subsidiary of United Energy Resources, Inc.

Gas Contract Administration

- Managed implementation of over 700 natural gas purchase contracts
- Monitored transactional integrity
- Worked with gas acquisition department to complete gas contracts

EDUCATION:

Texas A & M University

College Station, Texas

MBA, Finance

BBA, Management

Lauren S. Henderson

12305 Old Huffmeister Rd.

Cypress, TX 77429

281-664-2020

lhenderson@quantumgas.com

Manager, Natural Gas Operations with 6+ years of experience scheduling in the California, Maine, Maryland, Massachusetts, New York, Ohio, Pennsylvania, Georgia and Rhode Island. Adept in scheduling on the following pipelines: Tetco, Transco, DTI, Granite, Algonquin, TGP, TCO, CGT, Millennium, Iroquois, TransCanada, Empire, Union, and National Fuel.

PROFESSIONAL EXPERIENCE

Quantum Gas & Power Services, Inc.

Manager, Natural Gas Operations, October 2016 - present

Gas Operations Analyst, August 2012 – October 2016

- Supervise 5 Natural Gas Operations Analysts
- Develop a monthly supply strategy for each client I am responsible for to achieve the lowest cost to the client that is possible
- Execute the individual client's supply strategy
- Efficiently manage the client(s) storage assets (if applicable)
- Promptly execute all pipeline releases,
- Schedule and track natural gas deliveries to specific markets on behalf of several clients,
- Ensure deliveries are uninterrupted on various US pipelines across different regions to achieve 100% flow of all gas deliveries
- Reconcile all transportation and commodity invoices and verify accuracy prior to presentation to the clients for payment

HEB Grocery Store

Operations Leader, January 2009 – August 2012

- Majority of the time spent using independent judgment in making employment-related and business decisions, or effectively recommend such decisions including but not limited to product and department related strategies, hiring, promoting, disciplining, suspending, discharging, rewarding, or otherwise engage in resolving partner related matters.
- Accountable for the business operations for Gas, Cash office, Business Center, Showtime, Cooking Connection and Maintenance areas
- Provided direction, guidance, or advice to ensure others complete assignments
- Oversaw store claims and damages
- Worked with department managers to ensure the needs of the business are met

EDUCATION

Texas A&M University, College Station

- Dual BBA in Finance and Marketing, December 2008

William M. Han

33161 Marina Vista Drive • Dana Point, CA 92629 • (619) 980-2997 • William.M.Han@gmail.com

EXPERIENCE

- | | |
|--------------|---|
| 2020-Present | <p>Clean Energy (CLNE:NASDAQ) Newport Beach, CA</p> <p>Vice President – Head of Commodities</p> <ul style="list-style-type: none"> • West Natural Gas Trading and Asset Management <ul style="list-style-type: none"> ▪ Physical and financial trading across West basis market managing firms hedge portfolio, physical procurement, and spec book. ▪ Manage portfolio of LNG assets across California and Texas including plant optimization, gas procurement & transport, and physical and financial power transactions. • West Power Trading <ul style="list-style-type: none"> ▪ Manage financial spec and hedging for West power demand portfolio ▪ Procurement of power across WECC and ERCOT to serve firms power load portfolio ▪ Trade congestion products across CAISO, SPP, and ERCOT (CRR/FTR/PTP/Virtuals) • West Carbon Trading and Sustainability <ul style="list-style-type: none"> ▪ Build out and trade West carbon trading portfolio (CCAs/CCOs) ▪ Structured transactions and procurement of renewable power to attain company mandated scope 2 emission reduction goals ▪ Commodities management of all RNG project production, storage, and compliance |
| 2018-2020 | <p>Kin Advisors – Private Hedge Fund Costa Mesa, CA</p> <p>Vice President - Portfolio Manager Energy Desk</p> <ul style="list-style-type: none"> • Portfolio Management <ul style="list-style-type: none"> ▪ Capital allocation across energy linked investment portfolio concentrated within the natural gas, power, and RNG sectors. ▪ Balance portfolio concentration across various firm wide mandates and portfolio specific metrics on a risk adjusted basis • Investment Team - Deal Review and Execution <ul style="list-style-type: none"> ▪ Formulate Sector Investment Views implemented across origination and risk teams ▪ Manage deal execution teams - originations, credit, compliance, legal, and ops |
| 2014-2018 | <p>Sempra Energy San Diego, CA</p> <p>Portfolio Manager and Senior Energy Trader</p> <ul style="list-style-type: none"> • Team Lead of 6 energy traders focused on trading around firms renewable and gas fired generation fleet across North America. <ul style="list-style-type: none"> ▪ Primary mandate to provide reliable power to counterparties across North America while maximizing profitability of assets ▪ Find arbitrage opportunities and risk weighted relative value trades in the North American Power and Gas Markets trading swaps, futures, and options contracts ▪ Responsible for hiring and training analyst and associate level traders while providing mentorship towards professional growth • Built and scaled speculative portfolio trading physical and financial electricity and natural gas <ul style="list-style-type: none"> ▪ Responsible for Virtual and Convergence bidding book across SPP, CAISO, and ERCOT ▪ Responsible for establishing end to end physical power presence across North America (business case/tariff analysis/credit/testing/strategy/implementation/cross-training) |

- Responsible for bidding and hedging strategies of ~2000 MWs natural gas power plant fleet
 - Market shaped power products leveraging data analytics within proprietary models across transmission grids, generation outages, congestion risk, and weather patterns
 - Execute natural gas hedging strategies across short- and medium-term sparks spreads
- Managed Renewable fleet of ~1800 MWs across WECC/SPP/PJM/MISO
 - Traded around merchant exposure within the assets utilizing FTRs and physical hedges
 - Created models for biddings strategies across power markets (CAISO,SPP,MISO, ERCOT)
 - Coordinate outages and general operations with ISOs, off-takers, and plant operators
- Implemented transmission procurement strategies to wheel power across WECC/SPP/ERCOT
- Provided M&A group with pricing and congestion models for target asset acquisitions

2011-2014 **Barclays Investment Bank** New York, NY

Senior Natural Gas Trader/Scheduler

- Primary East gas cash trader and scheduler focused on AGT, TETCO, TGP, IGT, Transco
- Responsible for bidding and utilizing company transports contracts to maximize value while weighing flow risk
- Covering term positions on an as needed basis around the clock in cash and intraday markets

2010-2011 **Barclays Investment Bank** New York, NY

Associate Power Trader

- Trade financial products focused on PJM and CAISO including virtuals and ICE products
- Flow physical power pool to pool across PJM/NYISO/NEPOOL/MISO/WECC

2007-2010 **Constellation Energy (Subsidiary of Exelon Corporation)** Baltimore, MD

Asset Operations Associate

- Daily bidding and scheduling of firm's ~4000 mw nuclear generation fleet
- Provide daily operational intelligence reports around maintenance and outage affecting fleet
- Full reporting and compliance functions for NERC and PWC requirements

Analyst-Risk Analytics & Controls

- Built risk tools and models for use across risk systems to manage market and credit risk
- Performed in-depth analysis of forward exposures, price verification, and position reports
- Lead analyst to provide Ad-Hoc reports for the Chief Risk Officer and Chief Credit Officer

EDUCATION

2002-2007 **University of Maryland, College Park** College Park, MD

B.S. Mathematics and B.A. Economics (cum laude)

- 4 Year United State Military Academy Grant (West Point Scholarship Award Winner)
- National Championship Club Lacrosse Team Member

2002-2006 **United States Army Reserves** College Park, MD

- Selected to represent the battalion in Airborne School in Ft. Benning, GA
- Received VFW Commendation for Excellence in Leadership and Academics

SKILLS

- Expert user of vendor and industry platforms YES Energy/WSI/MDA/OASIS/WebSmart
- Expert user of CTRM/ETRM platforms Openlink/PCI/Right Angle/Allegro/Adapt2
- Highly Proficient in coding/leveraging Python, VB and VBA for trading, modeling, and automation applications
- Highly Proficient utilizing SQL for data analytics and management

2. “Any and all violations or failures to perform on customer contracts, obligation to sell, serve or otherwise provide gas to customers by the applicant or any predecessor or affiliate entity;”

Please see response to Confidential Attachment 3.

Outline of Customer Inquiries and Resolution Processes

Wave Energy places emphasis on customer care and therefore has a customer-first approach to responding to inquiries and complaints. Wave Energy customer support staff are trained in active listening and empathy.

1. When Wave Energy receives a customer complaint or inquiry by any means (e.g., telephone, email, facsimile or mail) and from any source (e.g., the customer or the Commission) the representative will make a record of the complaint in Wave Energy's customer service database and apply a case number or other identifying feature to the complaint.
2. Wave Energy will acknowledge receipt of all written complaints orally or in writing.
3. Wave Energy's record of any complaint shall include, at a minimum, the following:
 - (a) The name and address of the complainant;
 - (b) The date and time the complaint was received;
 - (c) The nature of the complaint;
 - (d) The result of the investigation of analysis;
 - (e) Who conducted the investigation;
 - (f) When the analysis was conducted;
 - (g) The final disposition of the complaint; and
 - (h) The date of the final disposition of the complaint.
4. With regard to any disputed amounts, Wave Energy will inform all customers of how to contact the Commission's Consumer Services Division to pursue an unresolved dispute.
5. Wave Energy shall make a good faith effort to resolve disputes and cooperate with the resolution of any joint issues with the applicable utility.
6. Wave Energy will follow all other processes and procedures outlined by the Commission or other applicable agency in responding to the complaint.

Customer Inquiries

1. Wave Energy will address all customer inquiries promptly. This involves:
 - a. Providing fair and consistent treatment to all consumers;
 - b. Providing an acknowledgment or response to a customer;
 - c. Providing a final response of the customer's inquiry;
 - d. Providing customers with a toll-free telephone number for access to a Wave Energy customer service representative ("CSR");
 - e. Maintaining a customer service database and customer service department for which Wave Energy can effectively responds to consumer inquiries;
 - f. The CSR shall take the following steps for responding to inquiries:
 - i. Respond to the customer's inquiry;
 - ii. Transfer the inquiry to the responsible party;
 - iii. Direct the customer to contact the responsible party;
 - iv. Contact the responsible party on behalf of the consumer and update the consumer on the resolution; or
 - v. Transfer emergency telephone calls directly to the distribution utility or provide the distribution utility's emergency contact number.