



## **Filing Receipt**

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**Item Number - 1**



*Public Utility Commission of Texas*  
1701 N. Congress Avenue or P.O. Box 13326  
Austin, Texas 78711-3326  
512-936-7000  
Web address: [www.puc.texas.gov](http://www.puc.texas.gov)

**Application for, or amendment to,  
a Retail Electric Provider (REP) Certificate**  
(In accordance with 16 Texas Administrative Code (TAC) § 25.107)

**TITLE PAGE (TP)**

**ALL SUB-PARTS ARE APPLICABLE TO OPTION 1, 2, AND 3 REPS.**

**TP-1. Applicant Name – Applicant must provide its legal business name as it appears on applicant's relevant Texas Secretary of State (Texas SoS) registration. A relevant Texas SoS registration can include a Certificate of Formation or Certificate of Registration/Authority, or equivalents.**

Applicant legal business name: **Sun Top Energy LLC**

Second applicant legal business name (if required):

**TP-2. Type of Certification – As required by 16 TAC § 25.107(a)(1)(A), a person must obtain a REP certificate under section 16 TAC § 25.107 before purchasing, taking title to, or reselling electricity to provide retail electric service. A person may certify as an Option 1 REP, Option 2 REP, or Option 3 REP.**

**(a) Check only one of the following and, as applicable, provide the required information.**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> New REP Option 1 certification | <input type="checkbox"/> New REP Option 2 certification |
| <input type="checkbox"/> New REP Option 3 certification            | <input type="checkbox"/> REP certificate amendment      |
| ◆ Type of REP certificate:   |   |
| ◆ REP certification no.:   |   |

**(b) For amendment applications, check one or more of the following options relating to the amendment categories requested in this filing:**

- ☐ Change in ownership or control of the applicant.
- ☐ Corporate restructuring that involves the applicant (Option 1 REPs only).
- ☐ Transfer of a REP certificate.
- ☐ Name change amendment, including addition or deletion of assumed names.
- ☐ Customer Change, including additions or deletions of customers (Option 2 and 3 REPs only).

- ☐ Change in service area (Option 1 REPs only).
- ☐ Change in technical and managerial qualifications (Option 1 REPs only).
- ☐ Change in financial qualifications (Option 1 REPs only).
- ☐ Change in REP's type of certification as an Option 1, Option 2, or Option 3 REP.
- ☐ Relinquishment of certification.
- ☐ Other (Explain in "c" below).

**(c) Written explanation of the amendment (attach additional pages if necessary).**

N/A

**(d) Date each material change was or will be effective. As required by 16 TAC § 25.107(h)(4)(A), an applicant must state the effective date of each material change that prompted the amendment application.**

Date(s): N/A

## MANDATORY INFORMATION (MI)

### MI-1, MI-2, AND MI-3 ARE APPLICABLE TO OPTION 1, 2, AND 3 REPS.

#### MI-1. Applicant's Primary Contact Information – As required by 16 TAC § 25.107(d)(1)(D)(i).

Contact name: Willie Drew Title: President

Street or mailing address: 18714 Yorkshire Manor Ct

Mailing address (suite, floor or room):

City: Spring State: TX ZIP: 77379

Phone no.: 713-232-0354 Toll free no.:

Email: mountaintopdev@live.com Web address: [www.mtntopdev.org](http://www.mtntopdev.org)

#### MI-2. Authorized Representative Contact Information – As required by 16 TAC § 25.107(d)(1)(D)(ii).

Contact name: Willie Drew Title: President

Street or mailing address: 18714 Yorkshire Manor Ct

Mailing address (suite, floor or room):

City: Spring State: TX ZIP: 77379

Phone no.: 713-232-0354

Email: mountaintopdev@live.com Web address: [www.mtntopdev.org](http://www.mtntopdev.org)

#### MI-3. General Affidavit – As required by 16 TAC § 25.107(d)(2)(A), an applicant is required to provide as Attachment MI-3 a signed, notarized affidavit from an executive officer affirming all material provided in the application is true, correct, and complete.

☒ Applicant completed and provided Attachment MI-3.

### MI-4 AND MI-5 ARE APPLICABLE TO OPTION 1 REPS ONLY.

**MI-4. Persons Prohibited from Exercising Control – As required by 16 TAC § 25.107(e)(2)(E)(iv), an applicant must complete the affidavit labeled as Attachment MI-4. An applicant must further provide as Attachment MI-4 a statement identifying certain persons that meet the criteria of 16 TAC § 25.107(e)(2)(E)(iv)(I)(-a-) through (-d-), and the applicant's relationship with such persons. As specified by 16 TAC § 25.107(e)(2)(E)(iv)(I), such persons are inclusive of all of the applicant's principals, executive officers, employees, and third-party providers that meet the criteria. Further, 16 TAC § 25.107(e)(2)(E)(v) requires an applicant affirm that persons listed under 16 TAC § 25.107(g)(1) do not control the applicant and are not relied upon by the applicant to meet the requirements listed under 16 TAC § 25.107(e)(1)(A) – (B). The affidavit must be notarized and signed by an executive officer of the applicant.**



**Applicant must check all of the options below that apply.**

**Applicant has identified a principal, executive officer, employee, or third-party provider of applicant that:**

- ☐ Exercised direct or indirect control over a REP that experienced a mass transition of the REP's customers under 16 TAC § 25.43 at any time within the six months prior to the mass transition. Applicant provided Attachment MI-4, including a supporting affidavit, identifying the person and their relationship to the applicant in accordance with 16 TAC § 25.107(e)(2)(E)(iv)(I)(-a-) and 16 TAC § 25.107(g)(1)(A)(i).
  - ☐ Exercised direct or indirect control over a market participant at any time within the six months prior to a market participant having had its ERCOT standard form market participant agreement (SFA) terminated or a similar agreement for an applicable independent organization terminated. Applicant provided Attachment MI-4, including a supporting affidavit, identifying the person and their relationship to the applicant in accordance with 16 TAC § 25.107(e)(2)(E)(iv)(I)(-b-) and 16 TAC § 25.107(g)(1)(A)(ii).
  - ☐ Exercised direct or indirect control of a market participant within the prior six months of a market participant having exited an electricity or gas market with outstanding payment obligations that remain outstanding. Applicant provided Attachment MI-4, including a supporting affidavit, identifying the person and their relationship to the applicant in accordance with 16 TAC § 25.107(e)(2)(E)(iv)(I)(-c-) and 16 TAC § 25.107(g)(1)(A)(iii).
  - ☐ Have been barred, in any way, participation by Commission order. Applicant provided Attachment MI-4, including a supporting affidavit, identifying the person and their relationship to the applicant in accordance with 16 TAC § 25.107(e)(2)(E)(iv)(I)(-d-) and 16 TAC § 25.107(g)(1)(B).
  - ☒ None of the above criteria apply to any of an applicant's principals, executive officers, employees, or third-party providers. Applicant completed and provided the affidavit labeled as Attachment MI-4.
- 
- ☒ Applicant confirms that a person meeting the criteria for persons prohibited from controlling a REP in accordance with 16 TAC § 25.107(g):
- (1) does not control the applicant; and
  - (2) is not relied upon to meet the basic certification requirements of 16 TAC § 25.107(d) or the technical and managerial requirements of 16 TAC § 25.107(e).

**MI-5. Information on Principals – As required by 16 TAC § 25.107(d)(2)(E)(iii) and (iv), an applicant must provide a list of ALL names, titles, phone numbers, and emails of applicant's principals, including executive officers, in Microsoft Excel format. To report more than five principals, including executive officers, provide as Attachment MI-5 additional pages of information.**

**Under 16 TAC § 25.107(b)(13), the term principal includes: A sole proprietor; a general partner of a partnership; an executive of a company (e.g., a president, chief executive officer, chief operating officer, chief financial officer, general counsel, or equivalent position); a manager, managing member, or a member vested with the management authority of a limited liability company or limited liability partnership; a shareholder with more than 10% equity of the REP, if a public company; and a person who exercises control and has apparent or actual authority to exercise such control over either the REP or a principal. A consultant, third-party provider, or fiduciary of a company such as the**

board of directors is a principal if it has apparent or actual authority to exercise control over the REP or principals of the REP, and exercises such control.			
Name: <b>Ronald Young</b>	Title: <b>Director</b>	Phone no.: 832-656-5069	Email: ronaldyoung3207@gmail.com
Name: <b>Wilma Robinson</b>	Title: <b>Director</b>	Phone no.: 832-941-6839	Email: wrobinson90@att.net
Name: <b>Valencia Dotson</b>	Title: <b>Director</b>	Phone no.: 713-306-8186	Email: vecedottie@gmail.com
Name: <b>Jordan Wallace</b>	Title: <b>VP, Strategy &amp; Operations</b>	Phone no.: 410-962-1188	Email: jordan@bithenergy.com
Name: <b>Robert Wallace</b>	Title: <b>CEO</b>	Phone no.: 410-962-1188	Email: jordan@bithenergy.com
<input checked="" type="checkbox"/> Applicant provided principal information in a word-searchable file and in a format native to Microsoft Excel (such as .xls, .xlsx, .xlsm, etc.). <input type="checkbox"/> Applicant provided additional principals as Attachment MI-5.			

## OTHER INFORMATION (OI)

**OI-1, OI-2, OI-3, OI-4, OI-5, OI-6, AND OI-7 ARE APPLICABLE TO  
OPTION 1, 2, AND 3 REPS.**

### OI-1. Regulatory Representative Contact Information – As required by 16 TAC § 25.107(d)(1)(D)(iii).

Contact name: Jordan Wallace	Title: VP Strategy and Operations	
Street or mailing address: 113 West Monument		
Mailing address (suite, floor or room):		
City: Baltimore	State: MD	ZIP: 21201
Phone no.: 410-962-1188		
Email: jordan@bithenergy.com	Web address: www.bithenergy.com	

### OI-2. Customer Complaint Representative Contact Information – As required by 16 TAC § 25.107(d)(1)(D)(iv).

Contact name: Jackie Shepherd	Title: Corporate Executive	
Street or mailing address: 18714 Yorkshire Manor Ct		
Mailing address (suite, floor or room):		
City: Spring	State: TX	ZIP: 77379
Phone no.: 7133855068	Toll free no.:	
Email: jmshepherd96@hotmail.com	Web address: N/A	

### OI-3. Emergency Contact Information – As required by 16 TAC § 25.107(d)(1)(D)(v). An applicant may provide up to three emergency contacts. The Commission prefers that an applicant provide at least two emergency contacts.

Primary contact: Ronald Young	Title: Director	
Office no.:		
Cell no.: 832-656-5069	Home no.:	
Email: ronaldyoung3207@gmail.com	Web address: N/A	
Secondary contact: Wilma Robinson	Title: Director	
Office no.:		
Cell no.: 832-941-6839	Home no.:	
Email: wrobinson90@att.net	Web address: N/A	



Tertiary contact: Jackie Shepherd		Title: Corporate Executive	
Office no.: 7133855068			
Cell no.: 7133855068		Home no.:	
Email: jmshepherd96@hotmail.com		Web address: N/A	
<b>OI-4. Applicant's Company Contact Information – An applicant must provide the following contact information related to its Texas office address, mailing address, and address of its principal place of business as required by 16 TAC § 25.107(d)(1)(E).</b>			
<b>(a). Texas Office Address (cannot be a Post Office Box (P.O. Box)) – As required by 16 TAC § 25.107(d)(1)(E)(i). An applicant must provide a Texas office address, as it appears on applicant's relevant Texas SoS registration for the purpose of providing customer service. The Texas office address may not be a P.O. Box under 16 TAC § 25.107(d)(1)(E)(i)(III). The Texas office address may be the same as the applicant's primary business office under OI-4(b), provided that the principal place of business address is not a P.O. Box.</b>			
Primary business office address: 18714 Yorkshire Manor Ct			
City: Spring		State: TX	ZIP: 77379
Email: mountaintopdev@live.com		Web address:	
Phone no.: 346-772-9300		Toll free no.:	
<input checked="" type="checkbox"/> The Texas office address is the same as primary business office address, and the primary business office address is not a P.O. Box.			
<b>(b). State of Formation/Incorporation and Address of Primary Business Office (Principal Place of Business) – As required by 16 TAC § 25.107(d)(1)(E)(ii), an applicant must provide its state of formation or incorporation, and the address of its primary business office address as it appears on applicant's relevant Texas SoS registration. An applicant's primary business office is its principal place of business (i.e. where its executive officers direct, control, and coordinate the corporation's activities) and may be located in a different state from the applicant's state of formation or incorporation.</b>			
State of formation/incorporation: Texas			
Primary office address: 18714 Yorkshire Manor Ct			
City: Spring		State: TX	ZIP: 77379
<b>(c). Mailing Address (if different from the Texas Office address or primary business office address) – As required by 16 TAC § 25.107(d)(1)(E)(iii).</b>			
Mailing address: N/A			
City:		State:	ZIP:



<b>(d). Registered Agent – As required by 16 TAC § 25.107(d)(1)(E)(iv), an applicant must provide the name and address of the applicant's registered agent for the purpose of receiving service of process</b>		
Name of Registered Agent: <b>Willie M Drew</b>		
Address of Registered Agent: <b>18714 Yorkshire Manor Ct</b>		
City: <b>Spring</b>	State: <b>TX</b>	ZIP: <b>77379</b>
<b>OI-5. Emergency Operation Plan – As required by 16 TAC § 25.107(d)(2)(G), an applicant is required to file an emergency operations plan that complies with 16 TAC § 25.53.</b>		
Project no.: <b>Sun Top Energy LLC EOP</b>		
Item no.: <b>EOP</b>		
<b>OI-6. Certificated Name(s) and Legal Entity Status – As required by 16 TAC § 25.107(d)(1)(A), an applicant must only provide retail electric service under the name or names set forth in an approved application for certification or subsequent amendment application. In accordance with 16 TAC § 25.107(d)(1)(C), a REP's certificate must contain the REP's legal business name and all assumed names under which it proposes to provide service. An applicant must also maintain an active business registration with the Texas SoS.</b>		
<p><b>(a). Primary Name on Certificate – As required by 16 TAC § 25.107(d)(2)(B), an applicant must disclose information related to the applicant's status as a legal entity, including information related to its tax status and authority to do business in Texas to verify the information required under 16 TAC § 25.107(d)(1)(A)-(C).</b></p> <p><b>As required by 16 TAC § 25.107(d)(2)(B)(i), an applicant is required to provide a copy of the applicant's relevant Texas SoS registration as Attachment OI-6. An applicant must also provide all filing numbers associated with such registration below.</b></p> <p><b>Under 16 TAC § 25.107(d)(2)(B)(i) an applicant's legal business name, as it appears on the applicant's Texas SoS registration, must not be deceptive, misleading, vague, otherwise contrary to 16 TAC § 25.272, or duplicative of a name previously approved for use by a REP.</b></p>		
Primary name on certificate (Applicant's legal business name on applicable Texas SoS certificate, must match the name disclosed under TP-1 of this form): <b>Sun Top Energy LLC</b>		
For name change amendment only, applicant's previous legal business name:		
Texas SoS (or County) filing number associated with registration: <b>803763129</b>		
Indicate below the type of registration on file with the Texas SoS. Complete only the option below that applies. <input checked="" type="checkbox"/> Certificate of Formation or equivalent (For Texas Entities) <input type="checkbox"/> Certificate of Registration/Authority or equivalent (For Out-of-State Entities) <input type="checkbox"/> Other, please specify:		
Date and state where business was established: <b>09/17/2020, Texas</b>		

<input checked="" type="checkbox"/> Applicant provided a copy of its Texas SoS registration (either a Certificate of Formation or Certificate of Registration/Authority, or equivalent) as Attachment OI-6.		
<b>(b). Tax Information and Other Registrations – As required by 16 TAC § 25.107(d)(2)(B)(ii), an applicant must disclose its Texas Comptroller Tax Identification number, and all other relevant or applicable file numbers.</b>		
Texas Comptroller's Tax ID no.: 32075916505		
Other applicable or relevant certification/file nos.:		
<b>(c). EXISTING Approved Assumed Names (if applicable) (Maximum of Five Assumed Names) – To comply with 16 TAC § 25.107(d)(1)(A), an applicant must disclose any assumed names already used in the applicant's regular course of business as a REP.</b>		
Commission approved assumed name: N/A		
Commission approved assumed name:		
Commission approved assumed name:		
Commission approved assumed name:		
Commission approved assumed name:		
<b>(d). REQUESTED Assumed Names (if applicable) (Maximum of Five Assumed Names) – An applicant may request to use up to a total of five assumed names in addition to the primary name on the REP certificate. Under 16 TAC § 25.107(d)(1)(B), a REP is prohibited from using more than five assumed names in association with a single REP certificate.</b>		
Name: N/A	Texas SoS file no.	Date active:
Name:	Texas SoS file no.	Date active:
Name:	Texas SoS file no.	Date active:
Name:	Texas SoS file no.	Date active:
Name:	Texas SoS file no.	Date active:
<b>(e). DELETION of EXISTING Assumed Names (if applicable)</b>		
Assumed name to be DELETED: N/A		
Assumed name to be DELETED:		
Assumed name to be DELETED:		
Assumed name to be DELETED:		
Assumed name to be DELETED:		



**OI-7. Ongoing Obligations – In accordance with 16 TAC § 25.107(d)(2)(F), an applicant must provide as Attachment OI-7 a statement that applicant has complied with the requirements under 16 TAC § 25.107(d)(1)(F) and (H)-(I), or for 16 TAC § 25.107(d)(1)(I) how the applicant will comply, and include a short summary describing the manner of compliance for each subparagraph.**

- ☒ Applicant provided a statement affirming compliance with 16 TAC § 25.107(d)(1)(F) and (H)(I) and included a short summary describing the manner of compliance for each subparagraph as Attachment OI-7.

**OI-8 AND OI-9 ARE APPLICABLE TO OPTION 1 REPS ONLY.**

**OI-8. ERCOT Requirements – In accordance with 16 TAC § 25.107(e)(1)(C)(i)-(iv) an applicant, if providing retail electric service in the ERCOT region, must provide the below information as required by 16 TAC § 25.107(d)(2)(F)(i)-(v).**

- ☒ **Qualified Scheduling Entity (QSE) information.** Applicant completed and provided Attachment OI-8.
- ☒ **Applicant confirmation of capability and effective procedures.** Applicant confirms it has the capability and effective procedures to be the primary point of contact for retail electric customers for distribution system service in accordance with applicable Commission rules, including procedures for relaying outage reports to the TDU on a 24-hour basis.
- ☒ **Outage notification information.** Applicant confirms it will provide outage notifications in accordance with 16 TAC § 25.53.
- ☒ **ERCOT testing obligation.** Applicant has or will soon complete ERCOT's flight test obligation.
- ◆ **Date of applicant's last (or applicant's next scheduled) ERCOT Flight Test:** 05/13/25

**OI-9. Registration with ERCOT or Other Applicable Independent Organization –As required by 16 TAC § 25.107(e)(2)(E)(iii), an applicant is required to provide as Attachment OI-9 a notarized affidavit signed by an executive officer of the applicant affirming that the applicant will register with or be certified by the applicable independent organization and that the applicant will comply with the technical and managerial requirements of this subsection; and that third-party providers with whom the applicant has a contractual relationship are registered with or certified by the independent organization, as appropriate, and will comply with all system rules and protocols established by the applicable independent organization.**

- ☒ Applicant completed and provided Attachment OI-9.



## PART A – OWNERSHIP & CORPORATE STRUCTURE

**ALL SUB-PARTS ARE APPLICABLE TO OPTION 1, 2, AND 3 REPS.**

**A-1. Subsidiaries, Parent Companies, and Sister Companies –** As required by 16 TAC § 25.107(d)(2)(E)(i) an applicant must provide a list of the applicant's subsidiaries and parent companies up to the ultimate corporate parent, and any sister companies that are registered or certified with the Commission. Each company must be identified by name and, if applicable, type of Commission registration or certification. To report more than five subsidiaries, parent companies, or sister companies provide a list of such companies as Attachment A-1.

Subsidiary, parent, or sister company name: N/A	Type of Commission certification: N/A	Commission certification no.:
Subsidiary, parent, or sister company name:	Type of Commission certification:	Commission certification no.:
Subsidiary, parent, or sister company name:	Type of Commission certification:	Commission certification no.:
Subsidiary, parent, or sister company name:	Type of Commission certification:	Commission certification no.:
Subsidiary, parent, or sister company name:	Type of Commission certification:	Commission certification no.:

☐ Applicant provided additional subsidiaries, parents, and sister companies as Attachment A-1.

**A-2. Ownership and Corporate Structure–** As required by 16 TAC § 25.107(d)(2)(E)(ii) an applicant must provide an ownership and corporate structure chart that includes ownership percentages. The chart must be as detailed as practicable, but must contain, **AT MINIMUM**, the entities provided under A-1 and any entities with more than ten percent ownership of the REP or any of the REP's parent companies with a controlling interest in the REP.

☒ Applicant provided an ownership and corporate structure chart as Attachment A-2.

## **PART B – SERVICE AREA OR CUSTOMERS SERVED**

### **B-1 IS APPLICABLE TO OPTION 1 REPS ONLY.**

**B-1. Option 1 REP – An applicant must identify its service area by geography by selecting one of the options below.**

- ☒ Entire state of Texas.
- ☐ Service area of one or more transmission and distribution utilities (TDUs), municipally owned utilities, or electric cooperatives. Identify entity's service territory:
- ☐ Geographic area of one or more independent organizations (e.g. ERCOT) within Texas. Identify each independent organization:
- ☐ Specific geographic area. Identify on, and provide as, Attachment B-1 the zip codes defining the requested service area.

### **B-2 IS APPLICABLE TO OPTION 2 REPS ONLY.**

**B-2. Option 2 REP – An applicant must identify its customers.**

- ☐ Provide as Attachment B-2A an affidavit confirming the applicant will only provide services to customers using one megawatt or more of electricity with which it has contracted to provide services.
- ☐ Within 30 days of the application being approved, or before the application is approved, provide as Attachment B-2B an affidavit from each of the REP's customers with which it has contracted to provide one (1) megawatt of energy or more and that the customer accepts the REP's ability to provide continuous and reliable electric service based on the REP's financial, managerial, and technical resources.
- ☐ Applicant acknowledges that failure for any reason to provide a customer affidavit within 30 days of the application for an Option 2 REP certificate being approved will result in the REP certificate being administratively revoked. The REP will not be certificated to supply retail electric service to any customers for which the applicant does not provide an affidavit for within 30 days of the application being approved

Name of Customer(s):

### **B-3 IS APPLICABLE TO OPTION 3 REPS ONLY.**

**B-3. Option 3 REP – An applicant must identify its customer.**

- ☐ Provide as Attachment B-3 an affidavit which states that the applicant is in compliance with 16 TAC §§ 25.107(d)(2)(J), 25.109, 25.211, and 25.212.

Name of the Power Generation Company (PGC):

PGC Commission registration number:

Name of the non-residential or small commercial end-use Customer(s):



## PART C – FINANCIAL REQUIREMENTS

### C-1 IS APPLICABLE TO OPTION 1, 2, AND 3 REPS.

#### C-1. Collection of Transition Charges – An applicant must comply with 16 TAC § 25.107(j).

**Applicant must complete one of the options below.**

- ☐ Yes, applicant will collect transition charges, as applicable.
- ☒ No, applicant will not collect transition charges.

### C-2, C-3, C-4, AND C-5 ARE APPLICABLE TO OPTION 1 REPS ONLY.

#### C-2. Access to Capital – An applicant must choose one of the two methods below ((a) or (b)) to demonstrate that an applicant meets the access to capital requirements stated in 16 TAC § 25.107(f)(1).

**(a). Guarantor – If applicant elects to maintain an executed version of the Commission approved standard form irrevocable guaranty agreement under 16 TAC § 25.107(f)(1)(A), then applicant must complete the below information.**

**Name of Guarantor(s):**

**Guarantor must have an investment grade credit rating OR adequate tangible net worth. Applicant must complete one of the options below.**

- ☐ **Guarantor has an investment grade credit rating.** If the applicant elects to meet the requirements of 16 TAC § 25.107(f)(1)(A)(ii)(I), provide as Attachment C-2A the documentation required by § 25.107(f)(4)(A) demonstrating an investment grade credit rating.
- ☐ **Guarantor has adequate tangible net worth.** If the applicant elects to meet the requirements of 16 TAC § 25.107(f)(1)(A)(ii)(II), provide as Attachment C-2A the documentation required by 16 TAC § 25.107(f)(4)(B) demonstrating tangible net worth greater than or equal to \$100,000,000, a minimum current ratio of 1.0, and a debt to total capitalization ratio not greater than 0.60.

**Guarantor must be an affiliate(s) of the applicant, a financial institution, OR a wholesale power provider. Applicant must complete one of the options below.**

- ☐ **Guarantor is an affiliate(s) of the applicant.**
- ☐ **Guarantor is a financial institution.** If the applicant elects to meet the requirements of 16 TAC § 25.107(f)(1)(A)(i)(II), provide as Attachment C-2B the documentation required by 16 TAC § 25.107(f)(4)(A) demonstrating an investment grade credit rating.
- ☐ **Guarantor is a provider of wholesale power supply, or is otherwise an affiliate of a provider of wholesale power supply, for the applicant.** If the applicant elects to meet the requirements of 16 TAC § 25.107(f)(1)(A)(i)(III), provide as Attachment C-2B the documentation required by 16 TAC § 25.107(f)(4)(H) demonstrating an executed power purchase agreement and as applicable, proof of the guarantor's affiliation with the applicant's provider of wholesale power supply.

**Applicant must complete both of the options below indicating the irrevocable guaranty agreement is executed and filed in compliance with 16 TAC § 25.107(f)(4)(G).**

- ☐ **Execution of guaranty agreement.** Applicant has executed a Commission approved standard form irrevocable guaranty agreement as required by 16 TAC § 25.107(f)(4)(G)(i) and (ii).



- ☐ **Filing of executed guaranty agreement.** Applicant has filed the executed irrevocable guaranty agreement in Project No. 54827. **The Item No. is:**

**(b). Letter of Credit – If applicant elects to maintain an irrevocable stand-by letter of credit payable to the Commission under 16 TAC § 25.107(f)(1)(B), then the applicant must complete the below information.**

Applicant must demonstrate it has \$1,000,000 in shareholders' equity or that it has been serving load for two years or longer. Applicant must complete one of the options below.

- ☒ **Applicant has \$1,000,000 in shareholders' equity.** Applicant must provide as Attachment C-2A the documentation required by 16 TAC § 25.107(f)(4)(C) demonstrating adequate shareholders' equity.
- ☐ **Applicant has been serving load two years or longer and is exempt from requirement.** Applicant must provide the date it started serving load to prove it is exempt from the shareholders' equity requirement under 16 TAC § 25.107(f)(1)(B)(v). **Date REP started serving load:**

Applicant must complete both of the options below indicating the irrevocable stand-by letter of credit is executed and filed in compliance with 16 TAC § 25.107(f)(4)(F).

- ☐ **Execution of letter of credit.** Applicant has executed a Commission approved standard form irrevocable stand-by letter of credit payable to the Commission with a face value based on the number of electronic service identifies (ESI IDs) the REP serves in accordance with the requirements of 16 TAC § 25.107(f)(1)(B)(i)-(iii).
- ☐ **Filing of letter of credit.** Applicant has filed an irrevocable stand-by letter of credit in Project No. 37919. **The Item No. is:**

**C-3. Protection of Customer Deposits and Prepayments – An applicant that seeks to have the option of collecting customer deposits or prepayments must indicate its intention to do so and provide as Attachment C-3 the documentation required by 16 TAC § 25.107(f)(4)(D), (E), or (F), as applicable, that demonstrate compliance with 16 TAC § 25.107(f)(2). A REP collecting customer deposits must also comply with the requirements of 16 TAC § 25.478. A REP collecting customer prepayments must also comply with the requirements of 16 TAC § 25.498.**

Applicant must complete one of the options below.

- ☐ Yes, applicant seeks to collect customer deposits AND prepayments.
- ☐ Yes, applicant seeks to collect customer deposits.
- ☐ Yes, applicant seeks to collect customer prepayments.
- ☒ No, applicant does not seek to collect customer deposits or prepayments.

If applicant seeks to collect customer deposits or prepayments (i.e. previously checked "Yes" above), applicant must check one of the options below indicating how it will protect customer deposits or prepayments, and if applicable, complete the relevant sub-option.

- ☐ **Applicant will use and maintain a segregated cash account.** If the applicant seeks to protect customer deposits or prepayments with a segregated cash account, provide as Attachment C-3 the

documentation required by 16 TAC § 25.107(f)(4)(D) demonstrating compliance with 16 TAC § 25.107(f)(2).

- ☐ **Applicant will use and maintain an escrow account.** If the applicant seeks to protect customer deposits or prepayments with an escrow account, provide as Attachment C-3 the documentation required by 16 TAC § 25.107(f)(4)(E) demonstrating compliance with 16 TAC § 25.107(f)(2).
- ☐ **Applicant will use and maintain a letter of credit.** If the applicant seeks to protect customer deposits or prepayments with a letter of credit, then complete the next two sub-options. *If applicable, any irrevocable stand-by letter of credit provided by applicant for customer deposits or prepayments must be in addition to the irrevocable stand-by letter of credit provided under C-2(b).*
  - ☐ **Execution of letter of credit.** Applicant has executed a Commission approved standard form irrevocable stand-by letter of credit payable to the Commission.
  - ☐ **Filing of letter of credit.** Applicant has filed an irrevocable stand-by letter of credit in Project No. 37919. The Item No. is:

Check these options **ONLY IF** applicant will collect customer deposits or prepayments (i.e. previously checked “Yes” under C-3). Checking the option acknowledges the applicant’s agreement with each statement, which is required to collect customer deposits or prepayments.

- ☐ **Acknowledgment for protection customer deposit.** As required by 16 TAC § 25.107(f)(2)(A)(ii), applicant acknowledges that for customer deposits, a segregated cash account, escrow account, or an irrevocable stand-by letter of credit must be adjusted, as necessary, to maintain a minimum of 100% coverage of the REP’s outstanding customer deposits held at the close of each calendar month.
- ☐ **Acknowledgement for protecting customer prepayments.** As required by 16 TAC § 25.107(f)(2)(A)(iii), applicant acknowledges that for customer prepayments, a REP must maintain, at minimum, protection for all customer prepayments that equals or exceeds \$50. The balance of a segregated cash account, escrow account, or irrevocable stand-by letter of credit must be adjusted, as necessary, to maintain a minimum of 100% coverage of customer prepayment funds equal to or exceeding \$50 held at the close of each calendar month.

**C-4. Financial History (Insolvency, Bankruptcy, Dissolution, Merger, or Acquisition) – As required by 16 TAC § 25.107(f)(4), an applicant must identify any and all history of insolvency, bankruptcy, dissolution, merger, or acquisition during the 60 months immediately preceding the filing of the application.**

**Applicant must complete one of the options below.**

- ☐ The applicant has a financial history to disclose. Applicant provided as Attachment C-4 explanation of the financial history.
- ☒ The applicant does not have a financial history to disclose.

- ☒ **Acknowledgment of bankruptcy.** Applicant acknowledges that, upon filing a petition for bankruptcy, becoming subject of an involuntary bankruptcy proceeding, or in any manner becomes insolvent, including being in default with the applicable independent organization or with a transmission and distribution utility (TDU), applicant will file a notice in Project No. 54822 as prescribed by 16 TAC § 25.107(f)(3)(A) and (B):
  - ◆ The REP must notify the Commission within three working days of the event and must file with the Commission a summary of the nature of the event as required by 16 TAC § 25.107(f)(3)(A).

- ◆ The notification must be filed in Project no. 54822. If the REP has filed a petition for bankruptcy, then the REP must include in its filing the petition that initiated the bankruptcy as required by 16 TAC § 25.107(f)(3)(B).

**C-5. Financial Reporting Year – As required by 16 TAC § 25.107(f)(4), an applicant must report the month and last day of its' or its guarantor's reporting fiscal year.**

Month and last day of fiscal year of applicant or guarantor: **12/2023**



## **PART D – TECHNICAL AND MANAGERIAL REQUIREMENTS**

### **ALL SUB-PARTS ARE APPLICABLE TO OPTION 1 REPS ONLY.**

**D-1. Customer Service – As required by 16 TAC § 25.107(h)(4)(B), an applicant must identify if it is currently providing service to customers in Texas.**

**Applicant must complete one of the options below.**

- ☐ Yes, applicant is currently providing service to customers in Texas.
- ☒ No, applicant is not currently providing service to customers in Texas.

**D-2. 15 Years Competitive Electric or Gas Industry Experience – In accordance with 16 TAC § 25.107(e)(2)(B), an applicant must complete and provide as Attachment D-2 demonstrating that one or more applicant's principals and managerial employees have at least 15 years combined experience in the competitive electric or gas industry as required by 16 TAC § 25.107(e)(1)(A).**

- ☒ Applicant completed and provided Attachment D-2 and provided supporting resumes as part of Attachment D-2.

**D-3. Risk Management Experience – In accordance with 16 TAC § 25.107(e)(2)(B) and (C), an applicant must demonstrate that one executive officer or managerial employee of the applicant has five or more years' experience managing a substantial energy portfolio, OR an applicant can enter into an agreement with a providers of commodity risk management services as required under 16 TAC § 25.107(e)(1)(B).**

**Applicant must complete one of the options below.**

- ☒ Applicant completed Attachment D-3 and provided a supporting resume as part of Attachment D-3 for one executive officer or managerial employee demonstrating that the individual has five years' experience in managing a substantial energy portfolio. Provide specific dollar values of the magnitude of the portfolios managed.
- ☐ Applicant provided as Attachment D-3 an executed agreement with a provider of commodity risk management with a term not less than two years. **The agreement expires on:**

**D-4. Complaint History, Disciplinary Record and Compliance Record -- Provide as Attachment D-4, any complaint history, disciplinary record and compliance record during the ten years immediately preceding the filing of the application regarding the applicant, the applicant's corporate parent, all sister companies and subsidiaries of the applicant and the applicant's corporate parent, and affiliates of the foregoing that provide utility-like services or otherwise involving the applicant's principals and any person that merged with any of the preceding persons as required by 16 TAC § 25.107(e)(2)(D).**

**Applicant must complete one of the options below.**

- ☐ Applicant provided responsive information to 16 TAC § 25.107(e)(2)(D) as Attachment D-4.
- ☒ Applicant has nothing to report responsive to 16 TAC § 25.107(e)(2)(D).

**D-5. Investigations, Penalties and Violations of Deceptive Trade or Consumer Protection Laws and Regulations – An applicant must complete the affidavit labeled as Attachment D-5. An applicant must further provide as part of Attachment D-5 the information required by 16 TAC § 25.107(e)(2)(E)(i). The affidavit must be notarized and signed by an executive officer of the applicant.**

- ☒ Applicant completed and provided the affidavit labeled as Attachment D-5. As necessary, applicant provided explanation of information responsive to 16 TAC § 25.107(e)(2)(E)(i).

**D-6. Convictions and Liabilities for Fraud, Theft, Larceny, Deceit and Violations of Securities Laws, Customer Protection Laws and Deceptive Trade Laws – An applicant must complete the affidavit labeled as Attachment D-6. An applicant must further provide as Attachment D-6 the information required by 16 TAC § 25.107(e)(2)(E)(ii). The affidavit must be notarized and signed by an executive officer of the applicant.**

- ☒ Applicant completed and provided the affidavit labeled as Attachment D-6. As necessary, applicant provided explanation of information responsive to 16 TAC § 25.107(e)(2)(E)(ii).

**D-7. Third-Party Providers Relied Upon – In accordance with 16 TAC § 25.107(e)(2)(A), applicant must provide as Attachment D-7 a list of all third-party providers accompanied by a description of each third-party provider's responsibilities and delegation of authority. Under 16 TAC § 25.107(b)(16) a third-party provider can include a contractor, consultant, agent, or any other person not directly employed by the REP.**

- ☒ Applicant completed and provided Attachment D-7 and provided the information in a word-searchable file and in a format native to Microsoft Excel (such as .xls, .xlsx, .xlsm, etc.).

**ATTACHMENT MI-3****AFFIDAVIT FOR ALL APPLICATIONS****General Affidavit**State of: **Texas**

§

§

County of: **Harris**

§

My name is William M. Drew I am the President of the applicant.

I swear and affirm that I have personal knowledge of the facts stated in this application for, or amendment to, a retail electric provider (REP) certificate, that I am competent to attest to those facts, and that I have the authority to make this statement on behalf of the applicant. I further swear and affirm that all of the statements and representations made in this application for a REP certificate, or amendment to a REP certification, are true and correct. I swear and affirm that the applicant understands and will comply with all requirements applicable to a REP.

William M. Drew

Signature

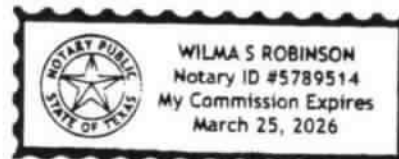
William M. Drew

Typed or Printed Name

President

Title of Signatory

SWORN TO AND SUBSCRIBED before me on the 1st day of July, 2024.

Wilma S. RobinsonNotary Public in and for the State of Texas.My commission expires on: 3/25/26.



## ATTACHMENT MI-4

### AFFIDAVIT FOR ALL OPTION 1 REP APPLICATIONS

Affidavit of Compliance with 16 TAC § 25.107(e)(2)(E)(iv) and (v)

State of: **Texas**

§

§

County of: **Harris**

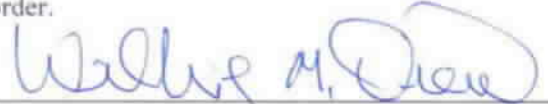
§

My name is **Willie M Drew** I am the **President** of the applicant.

I swear and affirm that I have personal knowledge of the facts stated in this application for, or amendment to, a retail electric provider (REP) certificate, that I am competent to testify to those facts, and that I have the authority to make this statement on behalf of the applicant.

I further swear and affirm that the applicant has provided all information as an attachment to this application regarding any current principal, executive officer, employee, or third-party provider of the applicant that:

- (1) exercised direct or indirect control over a REP that experienced a mass transition of the REP's customers under 16 Texas Administrative Code § 25.43 (relating to Provider of Last Resort) at any time within the six months prior to the mass transition;
- (2) exercised direct or indirect control over a market participant at any time within the six months prior to a market participant having had its Electric Reliability Council of Texas Standard Form Market Participant Agreement terminated or a similar agreement for an applicable independent organization other than ERCOT terminated;
- (3) exercised direct or indirect control of a market participant within the prior six months of a market participant having exited an electricity or gas market with outstanding payment obligations that remain outstanding; or
- (4) have been barred, in any way, participation by Commission order.



Signature

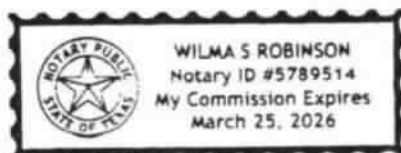
**Willie M Drew**

Typed or Printed Name

**President**

Title of Signatory

SWORN TO AND SUBSCRIBED before me on the 1st day of July, 2024.



Notary Public in and for the State of Texas

My commission expires on: 3/25/26

## **M1-5 PRINCIPALS**

<b>Ronald Young</b>	<b>Director</b>	<b>832-656-5069</b>	<b><u><a href="mailto:ronaldyoung3207@gmail.com">ronaldyoung3207@gmail.com</a></u></b>
<b>Wilma Robinson</b>	<b>Director</b>	<b>832-941-6839</b>	<b><u><a href="mailto:wrobinson90@att.net">wrobinson90@att.net</a></u></b>
<b>Valencia Dotson</b>	<b>Director</b>	<b>713-306-8186</b>	<b><u><a href="mailto:vecedottie@gmail.com">vecedottie@gmail.com</a></u></b>
<b>Jordan Wallace</b>	<b>VP Strategy &amp; Operations</b>	<b>410-962-1188</b>	<b><u><a href="mailto:jordan@bithenergy.com">jordan@bithenergy.com</a></u></b>
<b>Robert Wallace</b>	<b>President &amp; CEO</b>	<b>410-962-1188</b>	<b><u><a href="mailto:jordan@bithenergy.com">jordan@bithenergy.com</a></u></b>



## Office of the Secretary of State

The undersigned, as Secretary of State of Texas, does hereby certify that the attached is a true and correct copy of each document on file in this office as described below:

SUN TOP ENERGY LLC  
Filing Number: 803763129

Certificate of Formation

September 16, 2020

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on May 29, 2024.



A handwritten signature in cursive script that reads "Jane Nelson".

Jane Nelson  
Secretary of State



## Your DUNS Lookup Request for SUN TOP ENERGY LLC

Dun & Bradstreet <DandB@click.dandb.com>

Tue 7/2/2024 9:50 AM

To:mountaintopdev@live.com <mountaintopdev@live.com>



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07/02/2024

Willie Drew,

The following is the Dun & Bradstreet D-U-N-S® Number for **SUN TOP ENERGY LLC**

D-U-N-S number: **045945967**

If this is YOUR COMPANY, learn how to monitor and potentially impact your Dun & Bradstreet business credit file with [CreditBuilder](#).

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Call **1-800-700-2733**, Monday through Friday, 8:00 AM to 6:00 PM local time  
or contact us at [Dun & Bradstreet support](#).

Please add [dandb@click.dandb.com](mailto:dandb@click.dandb.com) to your email address book to ensure delivery of our emails to your inbox.

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101 JFK Parkway, Short Hills, NJ 07078

## **Emergency Operations Plan**

### **Sun Top Energy LLC**

**Purpose:** The Emergency Operations Plan (EOP) for Sun Top Energy LLC is designed to ensure the safety, reliability, and continuity of our operations during emergencies. This comprehensive plan outlines the procedures and protocols to be followed in the event of various types of emergencies, including natural disasters, equipment failures, and cyberattacks. Our primary objective is to protect our employees, customers, and assets while maintaining the uninterrupted supply of energy and services.

**Scope:** This EOP applies to all employees, contractors, and stakeholders associated with Sun Top Energy LLC. It covers all facilities and operations, including offices, power generation sites, and any other locations where business activities are conducted. The plan addresses a wide range of potential emergencies and provides detailed instructions for preparedness, response, recovery, and communication.

**Regulatory Compliance:** Sun Top Energy LLC is committed to complying with all relevant regulatory requirements, including 16 TAC § 25.107(d)(2)(G) and 16 TAC § 25.53. These regulations mandate the development and maintenance of a robust emergency operations plan that ensures our ability to effectively respond to and recover from emergencies. Our EOP is designed to meet and exceed these regulatory standards, ensuring both legal compliance and operational excellence.

Sun Top Energy LLC is committed to maintaining the highest standards of safety, reliability, and operational continuity during emergencies. Here's how we ensure these key aspects:

#### **1. Safety Protocols:**

- Risk Assessment: Regularly conduct comprehensive risk assessments to identify potential hazards and vulnerabilities. This helps in formulating effective mitigation strategies.
- Employee Training: Implement ongoing training programs for all employees, focusing on emergency response, first aid, and safety procedures. This ensures that every team member is well-prepared to handle emergencies.
- Personal Protective Equipment (PPE): Ensure that all personnel have access to and are trained in the use of appropriate PPE. Regularly inspect and maintain all safety equipment to ensure it is in good working condition.

- Emergency Drills: Conduct regular emergency drills, including fire, evacuation, and lockdown drills, to ensure readiness and quick response in actual emergencies.

## **2. Reliability:**

- Infrastructure Maintenance: Perform regular maintenance and inspections of all equipment and infrastructure to prevent failures and ensure reliable operations.
- Redundancy: Implement redundant systems and backup power supplies to maintain operations during power outages or equipment failures. This includes having backup generators and uninterruptible power supplies (UPS) for critical systems.
- Monitoring and Automation: Use advanced monitoring and automation technologies to detect and respond to issues in real-time. This includes SCADA systems for real-time data monitoring and automated response systems.

## **3. Continuity of Operations:**

- Business Continuity Plan (BCP): Develop and regularly update a comprehensive BCP that outlines procedures for maintaining critical operations during and after emergencies. This includes identifying critical functions and resources needed to sustain them.
- Communication Plan: Establish clear communication protocols to ensure that all stakeholders are informed and updated during emergencies. This includes internal communication among employees and external communication with customers, regulatory bodies, and the public.
- Supply Chain Management: Ensure that critical supplies and resources are always available. This includes establishing agreements with multiple suppliers to prevent disruptions in case of an emergency.

### **Compliance with 16 TAC § 25.107(d)(2)(G) and 16 TAC § 25.53**

Sun Top Energy LLC ensures full compliance with the requirements set by 16 TAC § 25.107(d)(2)(G) and 16 TAC § 25.53 through the following measures:

#### **1. Emergency Operations Plan (EOP):**

- Development: Develop a detailed EOP that addresses all aspects of emergency preparedness and response, as required by 16 TAC § 25.53.



The EOP includes procedures for risk assessment, resource allocation, response, recovery, and communication.

- Regular Updates: Regularly review and update the EOP to reflect changes in operations, technology, and regulations. Ensure that the plan incorporates lessons learned from drills and actual emergencies.

## **2. Filing and Documentation:**

- Submission: File the EOP with the Public Utility Commission of Texas (PUCT) as required by 16 TAC § 25.107(d)(2)(G). Ensure that all required documentation is complete and submitted on time.
- Record-Keeping: Maintain detailed records of all emergency response activities, including training sessions, drills, risk assessments, and actual emergency incidents. These records are essential for compliance audits and reviews.

## **3. Training and Drills:**

- Compliance Training: Ensure that all employees are trained on the specific requirements of 16 TAC § 25.53 and understand their roles and responsibilities in ensuring compliance.
- Regular Drills: Conduct regular drills and simulations to test the effectiveness of the EOP and ensure compliance with regulatory requirements. Use the outcomes of these drills to improve the plan and ensure readiness.

## **4. Audits and Reviews:**

- Internal Audits: Conduct regular internal audits to ensure that all aspects of the EOP and emergency preparedness activities comply with 16 TAC § 25.107(d)(2)(G) and 16 TAC § 25.53.
- External Reviews: Engage with external auditors and regulatory bodies to review compliance and address any identified gaps or areas for improvement

## **2. Preparedness**

Sun Top Energy LLC takes a proactive approach to identifying potential risks to ensure the safety and reliability of our operations. Here's how we conduct regular risk assessments:

### **1. Risk Assessment Framework:**

- Comprehensive Review: Conduct thorough reviews of all operational areas, including physical infrastructure, IT systems, supply chain, and human resources.
- Historical Data Analysis: Utilize historical data on past incidents, industry trends, and climate patterns to predict potential risks.
- Stakeholder Engagement: Engage with stakeholders, including employees, customers, and regulatory bodies, to gather insights on potential risks.

## **2. Natural Disasters:**

- Climate Data: Use meteorological and geological data to assess the risk of natural disasters such as hurricanes, floods, earthquakes, and wildfires.
- Vulnerability Assessment: Evaluate the vulnerability of our facilities and infrastructure to these natural disasters. This includes assessing the location, construction standards, and historical exposure to such events.

## **3. Equipment Failures:**

- Maintenance Records: Review maintenance records and performance data of all critical equipment to identify patterns that might indicate impending failures.
- Life Cycle Analysis: Conduct life cycle analysis of equipment to predict when replacements or major overhauls will be necessary.
- Inspection and Testing: Implement regular inspection and testing protocols to identify and address potential equipment issues before they lead to failures.

## **4. Cybersecurity Threats:**

- Threat Intelligence: Utilize cybersecurity threat intelligence services to stay informed about the latest threats and vulnerabilities.
- Penetration Testing: Conduct regular penetration testing and vulnerability assessments to identify weaknesses in our IT infrastructure.
- Incident Response Planning: Develop and test incident response plans to ensure rapid and effective responses to cyberattacks.

## **5. Other Hazards:**

- Regulatory Changes: Monitor changes in regulatory requirements that could impact operations.
- Supply Chain Disruptions: Assess the stability and reliability of key suppliers and identify alternative sources.
- Human Factors: Evaluate risks associated with human error, workforce turnover, and training needs.

## **Mitigation Strategies**

To address the identified risks, **Sun Top Energy LLC** develops and implements comprehensive mitigation strategies:

### **1. Securing Critical Infrastructure:**

- Physical Security: Enhance physical security measures, including access controls, surveillance systems, and perimeter defenses, to protect against unauthorized access and vandalism.
- Structural Reinforcements: Upgrade buildings and infrastructure to withstand natural disasters, such as reinforcing structures against high winds and flooding.
- Redundancy: Implement redundancy for critical systems and infrastructure to ensure continued operations in case of equipment failure. This includes backup power systems, redundant network paths, and spare parts inventory.

### **2. Enhancing Cybersecurity:**

- Advanced Cybersecurity Solutions: Deploy advanced cybersecurity solutions, such as firewalls, intrusion detection systems, and endpoint protection, to safeguard IT infrastructure.
- Employee Training: Conduct regular cybersecurity awareness training for employees to prevent phishing attacks and other social engineering tactics.
- Data Encryption: Implement data encryption for sensitive information both in transit and at rest to protect against data breaches.

### **3. Operational Strategies:**



- Preventive Maintenance: Establish a preventive maintenance schedule to ensure all equipment is regularly serviced and potential issues are addressed before they lead to failures.
- Emergency Response Drills: Conduct regular emergency response drills, including scenarios for natural disasters, cyberattacks, and equipment failures, to ensure readiness.
- Supply Chain Management: Develop strong relationships with multiple suppliers to ensure continuity of supply and implement inventory management practices to maintain critical stock levels.

#### **4. Continuous Improvement:**

- Feedback Loop: Create a feedback loop where lessons learned from drills, incidents, and near-misses are used to improve risk assessment and mitigation strategies.
- Technology Upgrades: Continuously invest in new technologies that enhance the ability to predict, monitor, and respond to risks.

### **1. Resource Allocation**

#### **Emergency Supplies:**

- Inventory Management: Sun Top Energy LLC maintains a comprehensive inventory of emergency supplies, which includes first aid kits, backup power generators, communication devices (e.g., two-way radios, satellite phones), fire extinguishers, and personal protective equipment (PPE). This inventory is regularly checked and replenished to ensure readiness at all times.
- Distribution Points: Strategic locations are designated within all facilities for storing emergency supplies, ensuring quick and easy access during an emergency.

#### **Personnel Training:**

- Emergency Response Training: All personnel undergo mandatory training in emergency response procedures, which covers evacuation protocols, use of emergency equipment, and basic first aid. Training sessions are held quarterly to keep skills sharp and updated.

- Role-Specific Training: Key personnel, such as members of the Emergency Response Team (ERT) and safety officers, receive additional specialized training. This includes incident command system (ICS) training, advanced first aid, and crisis management.

## **2. Response Procedures**

### **Emergency Response Protocols:**

- Activation of Emergency Response Team (ERT): The ERT is a dedicated group responsible for managing and coordinating all emergency response activities. The ERT leader has the authority to activate the team upon receiving notification of an emergency. The activation process includes notifying all team members, setting up an emergency command center, and deploying resources as needed.
- Incident Command System (ICS): Sun Top Energy LLC uses the ICS framework to manage emergency operations. This ensures clear command and control, with predefined roles and responsibilities, enabling effective coordination and communication during emergencies.

### **Evacuation Plans:**

- Facility Evacuation: Detailed evacuation plans are developed for each facility, including maps showing evacuation routes, designated assembly points, and procedures for accounting for all personnel. These plans are communicated to all employees and prominently displayed in key areas.
- Drills: Regular evacuation drills are conducted to ensure all employees are familiar with the evacuation procedures and can execute them effectively. These drills are evaluated, and feedback is used to improve evacuation plans.

### **Communication Protocols:**

- Internal Alerts: Sun Top Energy LLC uses multiple internal communication channels, such as email, SMS, intercom systems, and an internal emergency app, to disseminate emergency alerts and updates to all employees. These channels are tested regularly to ensure they function properly.
- External Communication: A comprehensive communication plan is in place to inform customers, regulatory bodies, and the public about the status of

operations during an emergency. This includes pre-drafted messages and a designated Public Information Officer (PIO) to manage external communications.

### **3. Continuity of Operations**

#### **Critical Operations:**

- Identification: Critical operations and functions that must be maintained during an emergency are identified through a business impact analysis (BIA). This includes energy supply, customer support, and IT services.
- Prioritization: Resources are prioritized to ensure the continuity of these critical operations. This includes assigning dedicated teams and resources to maintain these functions during an emergency.

#### **Redundancy and Backup Systems:**

- Power Backup: Backup power systems, such as generators and uninterruptible power supplies (UPS), are implemented to ensure critical operations can continue during power outages. These systems are tested regularly to ensure reliability.
- Data Backup: Critical data is backed up regularly and stored securely off-site. This ensures that data can be quickly restored in case of a system failure or cyberattack.

### **4. Training and Drills**

#### **Training Programs:**

- Employee Training: Regular training sessions are provided for all employees on emergency procedures, including first aid, fire safety, and evacuation. Training materials are updated regularly to reflect best practices and lessons learned from previous incidents.
- Specialized Training: The ERT and other key personnel receive specialized training in emergency response and incident management. This includes tabletop exercises, role-playing scenarios, and advanced first aid training.

#### **Drills and Simulations:**



- Regular Drills: Regular drills and simulations are conducted to test the effectiveness of the Emergency Operations Plan (EOP) and identify areas for improvement. These include fire drills, earthquake drills, and cyberattack simulations.
- Post-Drill Review: After each drill or simulation, a post-drill review is conducted to evaluate the response, identify strengths and weaknesses, and update the EOP as necessary.

## **5. Recovery**

### **Restoration Procedures:**

- Damage Assessment: Following an emergency, a thorough assessment of damage to facilities and equipment is conducted. This involves inspections by qualified personnel and coordination with external experts if necessary.
- Restoration Plan: A detailed plan for restoring normal operations is developed, prioritizing the most critical functions. This includes timelines for repairs, resource allocation, and communication strategies.

### **Support Services:**

- Employee Support: Support services are provided to employees affected by the emergency, including counseling, financial assistance, and temporary housing if needed. Employee well-being is a priority during the recovery phase.
- Customer Communication: Customers are kept informed about the status of restoration efforts and expected timelines for service resumption. This includes regular updates via email, social media, and the company website.

## **6. Communication**

### **Internal Communication:**

- Emergency Contact List: An up-to-date list of emergency contacts for key personnel is maintained and distributed to all employees. This list includes contact information for local emergency services, regulatory bodies, and key suppliers.

- Communication Drills: Internal communication channels are regularly tested to ensure they function properly during an emergency. This includes testing email systems, SMS alerts, and the internal emergency app.

#### **External Communication:**

- Public Information Officer (PIO): A PIO is designated to manage communication with the public and media during an emergency. The PIO is trained in crisis communication and has the authority to speak on behalf of the company.
- Crisis Communication Plan: A crisis communication plan is developed to guide external communication efforts. This includes pre-drafted messages, protocols for social media updates, and strategies for managing media inquiries.

### **7. Regulatory Compliance**

#### **Compliance with TAC Requirements:**

- Regular Audits: Regular audits are conducted to ensure compliance with 16 TAC § 25.53 and other relevant regulations. These audits include reviews of the EOP, training records, and emergency response activities.
- Documentation: Detailed records of all emergency response activities are maintained, including training sessions, drills, risk assessments, and actual emergency incidents. Required reports are submitted to regulatory bodies in a timely manner.

### **8. Plan Maintenance**

#### **Review and Update:**

- Annual Review: The EOP is reviewed annually and after each major emergency to ensure it remains current and effective. This includes incorporating feedback from employees and stakeholders.
- Stakeholder Feedback: Key stakeholders are involved in the review process, and their feedback is incorporated into the plan. This ensures the EOP is comprehensive and addresses all potential risks.

#### **Training and Communication:**

- Plan Distribution: Updated versions of the EOP are distributed to all employees, and training sessions are conducted to ensure everyone understands their roles and responsibilities.
- Training Updates: Training programs are updated to reflect changes to the EOP and incorporate lessons learned from previous incidents.

The Emergency Operations Plan (EOP) for Sun Top Energy LLC represents our unwavering commitment to the safety, reliability, and continuity of our operations. Through comprehensive preparedness, well-coordinated response protocols, and efficient recovery strategies, we aim to mitigate the impact of emergencies on our employees, customers, and stakeholders.



## Office of the Secretary of State

### CERTIFICATE OF FILING OF

SUN TOP ENERGY LLC  
File Number: 803763129

The undersigned, as Secretary of State of Texas, hereby certifies that a Certificate of Formation for the above named Domestic Limited Liability Company (LLC) has been received in this office and has been found to conform to the applicable provisions of law.

ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing filing effective on the date shown below.

The issuance of this certificate does not authorize the use of a name in this state in violation of the rights of another under the federal Trademark Act of 1946, the Texas trademark law, the Assumed Business or Professional Name Act, or the common law.

Dated: 09/16/2020

Effective: 09/17/2020



A handwritten signature in black ink, appearing to read "Ruth R. Hughs".

Ruth R. Hughs  
Secretary of State



As per 25.107(d)(1)(F) and (H)-(I), the applicant is committed to complying with all regulatory requirements.

Comply with all applicable scheduling, operating, planning, reliability, customer registration, and settlement policies, protocols, guidelines, procedures, and other protocols established by the applicable independent organization including any independent organization requirements for 24-hour coordination with control centers for scheduling changes, reserve implementation, curtailment orders, and interruption

plan implementation. Sun Top Energy LLC will comply with all protocols to ensure we meet and exceed these regulatory standards, ensuring both legal compliance and operational excellence. Our objective is to protect the customers while maintaining the uninterrupted supply of energy and services.

Maintain adequate staffing and employee training to meet all service level

Commitments: Sun Top Energy LLC will meet the standards by equipping our staff with ongoing training programs for all employees to ensure each employee is well-prepared to handle required commitments.

Respond within five working days to any commission or commission staff request for information, unless otherwise provided by the commission, commission staff, or other applicable law. Sun Top Energy LLC will establish clear communication protocols to ensure all are informed and updated during the need of critical moments of service. Our staff will be equipped with knowledge and held to high standards to ensure response time is within five working days of contact.

**ATTACHMENT OI-8****QSE Information**Term of service agreement: **Monthly**Date service agreement began: **August 2025**Company name: **Sun Top Energy LLC**Contact name: **Willie Drew**Title: **President**Physical address: **18714 Yorkshire Manor Ct**City: **Spring**State: **TX**ZIP: **77379**Email: **mountaintopdev@live.com**

Web address:

Phone no.: **713-232-0354**

Toll Free no.:

Term of service agreement:

Date service agreement began:

Company name:

Contact name:

Title:

Physical address:

City:

State:

ZIP:

Email:

Web address:

Phone no.:

Toll free no.:

Term of service agreement:

Date service agreement began:

Company name:

Contact name:

Title:

Physical address:

City:

State:

ZIP:

Email:

Web address:

Phone no.:

Toll free no.:

## ATTACHMENT OI-9

### Affidavit of Compliance with 16 TAC § 25.107(e)(2)(E)(iii)

State of: **Texas**

§

County of: **Harris**

§

§

My name is **Willie M Drew** I am the **President** of the applicant.

I swear and affirm that I have personal knowledge of the facts stated in this application for, or amendment to, a retail electric provider certificate, that I am competent to testify to those facts, and that I have the authority to make this statement on behalf of the applicant.

I further swear that the applicant will register with or be certified by Electric Reliability Council of Texas or other applicable independent organization and will comply with the technical and managerial requirements of this subsection; or that entities with whom the applicant has a contractual relationship are registered with or certified by the independent organization and will comply with all system rules established by the independent organization.

Willie M. Drew

Signature

**Willie M Drew**

Typed or Printed Name

**President**

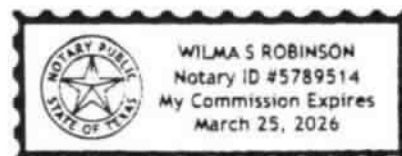
Title of Signatory

SWORN TO AND SUBSCRIBED before me on the 1st day of July, 2024.

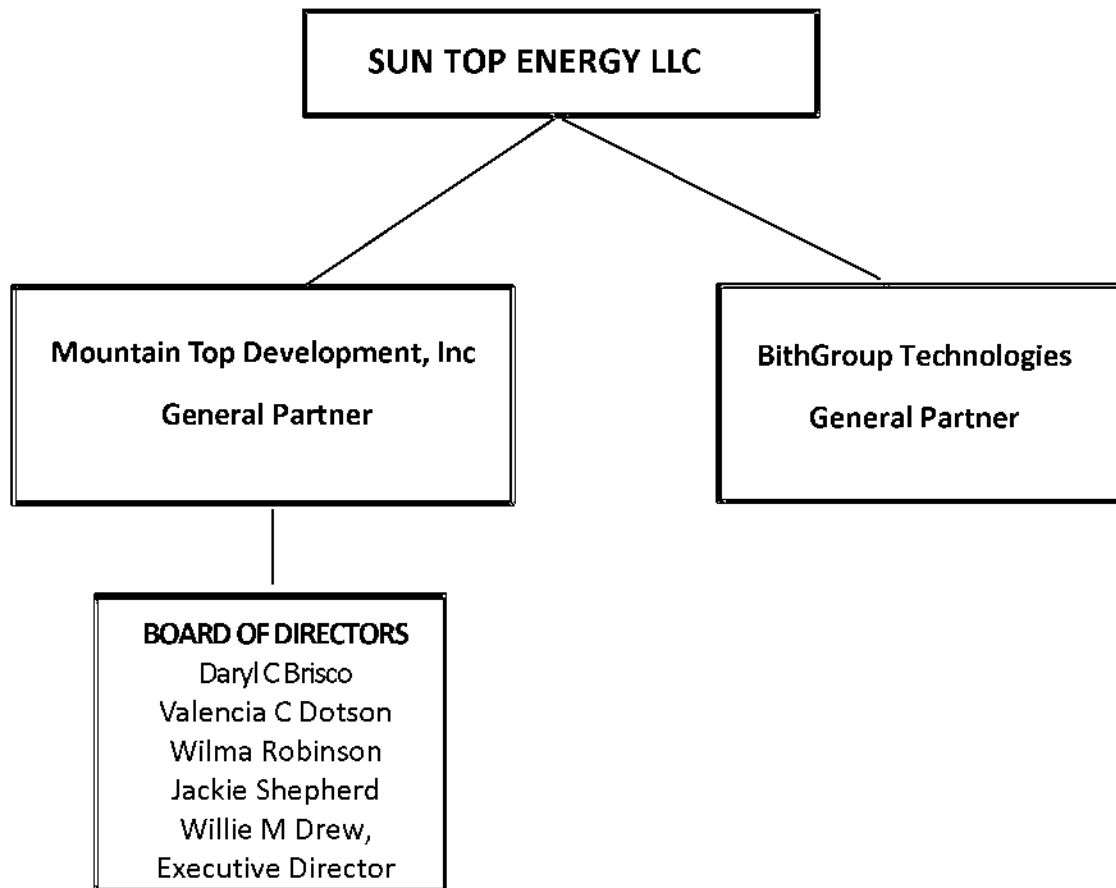
Wilma S Robinson

Notary Public in and for the State of TEXAS

My commission expires on: 3/25/26



## OWNER ORGANIZATIONAL CHART





## ATTACHMENT D-2

### Competitive Electric or Gas Industry Experience relied upon to meet Technical Qualifications

Name: <b>See Resume - Attachment D-2</b>	Title:
Employer:	Employment period:
Verifying contact name:	Contact's title:
Phone no.:	Email:

Name:	Title:
Employer:	Employment period:
Verifying contact name:	Contact's title:
Phone no.:	Email:

Name:	Title:
Employer:	Employment period:
Verifying contact name:	Contact's title:
Phone no.:	Email:

Name:	Title:
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Name:	Title:
Employer:	Employment period:
Verifying contact:	Contact's title:
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Verifying contact:	Contact's title:
Phone no.:	Email:

## *Robert L. Wallace*

### Education

#### **M.B.A.**

Master of Business Administration; emphasis in Information Technology and Finance,  
Amos Tuck School of Business, at Dartmouth College, Hanover, New Hampshire

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#### **Doctorate of Humane Letters**

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Executive Training, Minority Business Executive Program,  
Dartmouth College, 1996, 1998, 1999, 2001, Hanover, New Hampshire

#### **Executive Leadership Development**

Leadership Development Institute, Amos Tuck School of Business  
Dartmouth College, 2006, Hanover, New Hampshire

#### **Executive Business Training**

#### **Major, Entrepreneurship and Technology Management**

University of Texas, El Paso, 2000, El Paso, Texas

#### **Executive Development Institute**

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Immediate Past Vice-Chairman, Baltimore Workforce Investment Board  
Board Member, Baltimore Workforce Investment Board  
Chairman of the Board, University of Maryland Eastern Shore, Hawk Corporation  
Commissioner, State of Maryland Advanced Technology Commission  
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Board Member, Center Stage Playhouse  
Board Member, Towson University, Community Outreach Division  
Board Member, GE Center for Financial Learning

### Certifications

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Executive Training, University of Texas, at El Paso  
IBM Systems Engineering Symposium

	IBM Marketing Symposium Certified Novell Netware Administrator Certified IBM AIX Systems Administrator
<b>Awards Publications</b>	<p><b>AWARDS</b></p> <p>           Equal Business Opportunity Award, Howard County            Opportunity Exchange Award, Toyota Motor Corporation            Recognition Award, U.S. Department of Commerce Minority Business Development Agency            Certificate of Merit and Award, University of Eastern Africa, Baraton, Kenya            Business Plan Award Recognition, University of Texas at El Paso            Top 100 Minority Business Enterprise, 2006            Inaugural Protégé', State of Maryland Mentor-Protégé Program         </p> <p><b>PUBLICATIONS</b></p> <ul style="list-style-type: none"> <li>• <i>Black Wealth through Black Entrepreneurship</i>. Duncan &amp; Duncan Publishers, Edgewood, MD, 1993.</li> <li>• <i>Black Wealth: Your Road to Small Business Success</i>. John Wiley &amp; Sons, New York, NY, 2000.</li> <li>• <i>Soul Food 52 Principles for Black Entrepreneurial Success</i>. Perseus Books, Cambridge, MA, 2000.</li> <li>• <i>The Ssese Principles: Guidelines For Creating Wealth through Faith</i>, Authorhouse Publishers, Indianapolis, Indiana, 2006</li> <li>• <i>Strategic Partnerships: An Entrepreneur's Guide to Joint Ventures and Alliances</i>, Dearborn Publishers, Chicago, Illinois, 2004</li> </ul>

### Employee Summary

Robert L. Wallace is a native of Baltimore with over 28 years of experience in a broad range of strategic information technologies. He, along with his team of experts, have built up an impressive track record and background in the following technological areas:

- Wireless engineering and security
- Network Engineering and Security
- IT Consulting
- Management Consulting
- Software/Hardware Development
- Systems Design and Support
- IP Telephony
- Communications Systems

Mr. Wallace is an internationally known and respected entrepreneur, business consultant, and published author. He has advised Mayors, Governors, and corporate executives on the issues of technology implementation, enterprise architectures, system development, Y2K preparation, and strategies for maximizing operating efficiencies and governmental operations via strategic investments in technology. He is the immediate past chairman of the State of Maryland Information Technology Board (ITB), which advises the Governor and the State CIO on information

technology matters. He also serves as IT Consultant to the Information Technology Board (ITB) of Baltimore City Government. As a member of the Governor's Advance Technology Commission for the State of Maryland, Mr. Wallace helped to chart a framework for the flourishing of the hi-tech economy in Maryland. This commission worked to identify the strengths and weakness of Maryland's business climate, assessing successful initiatives in other pro-business states and submitted detailed recommendations to the Governor for further growth in Maryland's hi-tech economy. Wallace has earned special recognition from local, state, national and international governments for his work in technology implementation and small business development. Robert is a recognized expert in the areas of business economics, entrepreneurship, intrapreneurship, and urban economic development.

Robert Wallace is President and CEO of BiTHGROUP Technologies, Inc. a Maryland based information technology consulting firm that provides services in management consulting, wireless engineering and security, network engineering and security, systems design and development, and help desk support. He is also founder and CEO of EntreTeach Learning Systems, LLC an exciting e-learning company which provides educational and training services to corporations and government agencies. In 2004, Robert was appointed by the President of the University of Maryland, Eastern Shore, to serve as Chairman of the Board of The Hawk Corporation, a for-profit division of the University System. He is the author of five best-selling books and is currently conducting research for his sixth and seventh book projects on global economics and rational economics.

### **BITHGROUP Technologies, Inc.**

**1993-Present**

#### **Founder and President**

- President and CEO of BITHGROUP Technologies, Inc. BITHGROUP Technologies is at the forefront of wireless engineering and security, providing progressive IT solutions that drive organizational growth, efficiency and opportunities. BITHGROUP Technologies, Inc. is an established company that is still growing. The company serves a diverse range of government and commercial clients, from federal, state and local government agencies to small businesses and Fortune 500 companies.
- Program Manager/SME. Provide leadership and subject matter expertise on the design and development of new J2EE based Child Care Management Information System (Version II) for the State of Maryland Department of Human Resources.
- Project Manager. Managed team that was responsible for the redesign and implementation of the State of Maryland's Child Care Management Information System Version 1. Managing a team of 25 engineers, programmers, system analysts, trainers, and communications specialists.
- Project Manager for the implementation of 3000-node network for 5 building campus wiring DEC's pathworks network operating system over a 3000-node wide area network for the NAVAIR Department of the Navy. Team included network engineers, technicians, trainers, and PC specialists.
- Program Manager for Y2K consulting project for City of Baltimore. Work entailed designing Y2K strategy, implementation of strategy, design, development, and staffing Y2K command center, testing and risk management. Managed major BPR project for \$30 million Geographical Information System (GIS) in the Department of Public Works.
- Senior Level Consultant to the Information Technology Board (ITB) of the City of Baltimore. Advise the Mayor and his executives on critical information technology initiatives that impact the citizens of Baltimore City. Led effort to conduct Business Process Reviews for the implementation of Oracle ERP system for city government and Baltimore Public School System. Also provided consulting services in the initial research and design for Mayor O'Malley's CitiStat system. Additionally, provided executive management and oversight of



the Baltimore's first thoroughly researched information technology strategy plan, which has served as a guide for new and exciting citywide technology deployments.

**EntreTeach.com, LLC**

**1999 – Present**

**Founder, President and Chief Executive Officer**

- Founder and CEO of EntreTeach.com, an Internet Portal that provides business research, business economics, Web-based training and consulting services for small, minority, and women-owned businesses. The value added services that the company provides include:
  - Curriculum Design & Development
  - Business Research
  - Business Economics
  - Inter-organizational Business Networks
  - Business Requirements Analysis
  - System Concept Feasibility
  - Web Hosting
  - Design of Web Site
  - Design and Development of On-Line Training Modules
  - Technology Insertions and Upgrades

**ECS Technologies, Inc.**

**1992-1993**

**Senior Vice President**

- Founded and managed the Advanced Technology Division of ECS Technologies, Inc. which provided services in the areas of LAN/WAN engineering, telecommunications, and application development. Responsibilities entailed development of the legal structure of the entity, technology management, business development, sales and marketing, hiring of technical and professional staff, training of staff, and account management.

**Maryland National Bank (MNB)**

**1990-1992**

**Senior Information Technology Consultant**

- Managed technical team that consisted of network engineers, software engineers, trainers, network technicians, and technical writers. Responsible for the reengineering of the Benefits and Payroll departments and the ultimate design and implementation of a LAN/WAN to support the entire Human Resources Division. Also designed, developed, and implemented the first GUI based client/server application at MNB that was based on an Oracle database engine and the Gupta SQLWin development tools.

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**Chief Operating Officer**

- Managed day-to-day operations of mergers and acquisition company. Tasks included:
  - Managed negotiations with Investment Bankers and institutional investors
  - Business Plan Development
  - Design, development, and maintenance of information technology infrastructure

- Financial, operational, and engineering analysis of acquisition candidates
- Reviewed and reengineered manufacturing and operations business processes to maximize operating efficiencies.

#### **IBM Corporation**

**1984-1988**

##### **Systems Engineer/Network Engineer/Marketing Account Leader**

- Responsible for all IBM information technology activity at such large accounts as Westinghouse, McCormick, Ford Aerospace, General Motors, and Johns Hopkins Applied Physics Laboratory. Provided technical and business expertise in the areas of:
  - Mainframe Computing / 9370 Systems
  - I/O Subsystems
  - SNA
  - Telecommunications
  - CAD/CATIA/CAEDS
  - Personal Computer Systems
  - Joint Application Development
  - Systems Design and Development
- Provided consulting to client on how to effectively use information technology to solve business problems.

#### **Amos Tuck School of Business at Dartmouth College**

**1982-1984**

##### **Minority Business Program Facilitator**

- Assisted in the development of course curriculums, prepared lesson plans and training aids, prepared case studies, and delivered training to the participants in the Minority Executive Program at Dartmouth College. This unique program became the basis for the book; Black Wealth Through Black Entrepreneurship.

#### **E.I. DuPont de Nemours and Company**

**1978-1982**

##### **Manufacturing Engineer and Manager**

- Provided engineering services in the areas of research and design, instrument testing and design, process reengineering, total quality management, operations management, human resources management, process engineering, and environmental engineering. Services were provided to Chemical Dyes and Pigments, Polymer Products, Photo Products, and Human Resources divisions. Member of the Engineering Field Division.

#### **Procter and Gamble Company**

**1977**

##### **Manufacturing Engineer**

- Responsible for the production of soap and detergents while maximizing manufacturing efficiencies and minimizing waste. Designed and conducted plant wide study on the recovery of fatty acids used in the soap manufacturing process. Efforts reduced overall manufacturing cost by 25%. Provided reengineering analysis for new automated manufacturing systems.

#### **Westinghouse Nuclear Center**

**1976**

##### **Nuclear Engineer**

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Board Member, General Electric Center for Financial Learning  
Member, University of Pennsylvania Alumni Association  
Member, Dartmouth College Alumni Association  
Past Trustee, Gilman School  
Member, Alpha Phi Alpha Fraternity, Inc.  
Member, Maryland Leadership Committee  
Member, National Society of Mechanical Engineers  
Member, National Black Data Processing Association  
Member, National Society of Black Engineers  
Board Member, Howard County Commission on the Future  
Board Member, Inroads Venture Capital, Inc.  
Graduate of Greater Baltimore Committee for Leadership  
Graduate, Howard County Leadership  
Member, Maryland Technology Council  
Member, Mayor's Commission on African-American Males

## ATTACHMENT D-3

### Risk Management Experience relied upon to meet Technical Qualifications

Contact name: <b>Lesley Yang</b>	Title: <b>CEO</b>
Company name: <b>ArcTrade</b>	Years of experience or time period worked:
Type of experience:	Dollar value of portfolios managed:
Phone no.: <b>858-284-6189</b>	Email: <b>lesleyyang@arctrade.com</b>



## *Robert L. Wallace*

### Education

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#### **B.S.M.E**

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IBM Systems Engineering Symposium

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  - I/O Subsystems
  - SNA
  - Telecommunications
  - CAD/CATIA/CAEDS
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#### **Westinghouse Nuclear Center**

**1976**

##### **Nuclear Engineer**

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Member, Dartmouth College Alumni Association  
Past Trustee, Gilman School  
Member, Alpha Phi Alpha Fraternity, Inc.  
Member, Maryland Leadership Committee  
Member, National Society of Mechanical Engineers  
Member, National Black Data Processing Association  
Member, National Society of Black Engineers  
Board Member, Howard County Commission on the Future  
Board Member, Inroads Venture Capital, Inc.  
Graduate of Greater Baltimore Committee for Leadership  
Graduate, Howard County Leadership  
Member, Maryland Technology Council  
Member, Mayor's Commission on African-American Males

## ATTACHMENT D-5

### Affidavit of Compliance with 16 TAC § 25.107(e)(2)(E)(i)

State of: Texas

§

§

County of: Harris

§

My name is Willie M Drew . I am the President of the applicant.

I swear and affirm that I have personal knowledge of the facts stated in this application for, or amendment to, a retail electric provider certificate, that I am competent to testify to those facts, and that I have the authority to make this statement on behalf of the applicant.

I further swear and affirm that the applicant has provided all information as an attachment to this application regarding the applicant or the applicant's principals that are currently under investigation or have been penalized by an attorney general or any state or federal regulatory agency for violation of any deceptive trade or consumer protection laws or regulations.



Signature

Willie M Drew

Typed or Printed Name

President

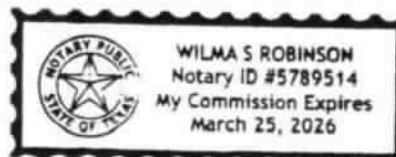
Title of Signatory

SWORN TO AND SUBSCRIBED before me on the 1st day of July, 2024.



Notary Public in and for the State of Texas

My commission expires on: 3/25/26



## ATTACHMENT D-6

### Affidavit of Compliance with 16 TAC § 25.107(e)(2)(E)(ii)

State of: Texas

§

§

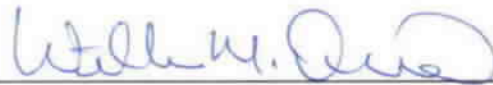
County of: Harris

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I further swear and affirm that the applicant has provided all information as an attachment to this application regarding the applicant or applicant's principals that have been convicted or found liable for fraud, theft, larceny, deceit, or violations of any securities laws, customer protection laws, or deceptive trade laws in any state.



Signature

Willie M Drew

Typed or Printed Name

President

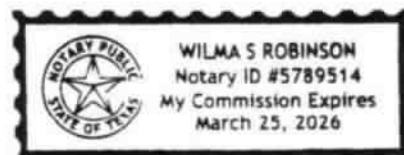
Title of Signatory

SWORN TO AND SUBSCRIBED before me on the 1st day of July, 2024.



Notary Public in and for the State of TEXAS

My commission expires on: 3/25/26



**ATTACHMENT D-7****Third-Party Providers Relied Upon**Type of service provided (billing, customer service, etc.): **Billing, customer service**Term of service agreement: **Monthly**Date service agreement began: **August 2025**

Type of experience:

Years of experience:

Company name: **ArcTrade**Contact name: **Lesley Yang**Title: **CEO**Physical address: **440 Stevens Ave #200**City: **Solana Beach**State: **CA**ZIP: **92075**Email: **lesleyyang@arctrade.com**

Web address:

Phone no.: **858-284-6189**

Toll free no.:

Type of service provided (billing, customer service, etc.):

Term of service agreement:

Date service agreement began:

Type of experience:

Years of experience:

Company name:

Contact name:

Title:

Physical address:

City:

State:

ZIP:

Email:

Web address:

Phone no.:

Toll free no.:

Type of service provided (billing, customer service, etc.):

Term of service agreement:

Date service agreement began:

Type of experience:

Years of experience:

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City:

State:

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Email:

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Toll free no.: