

Table 1 Lack of Meaningful Enforcement Penalties Against 23 of 38 CTA's

CAB "Abusive Marketing" Complaints
(in Descending Number of Total CAB Complaints)

Penalties Assessed
as of: 2/11/2025:

Rank	Name of "Core Transport Agent" (CTA) Company	2019	2020	2021	2022	2023	2024	Jan 2025	Total Complaints	Penalties Assessed		Total UEB Penalties Assessed (2019 – 2024)	# of Penalties as Percent of Total Complaints
										% of Top 5	% of Total		
1	SFE Energy California, Inc.	279	199	194	91	131	233	33	1,160			\$ 6,000	0.52%
2	Bolt Energy Services LLC		231	375	86	23	3	1	719			\$ 12,000	1.67%
3	AAA Natural Gas + Tiger Natural Gas (See Footnote)	101	113	70	18	109	121	17	549			\$ 377,000	68.67%
4	Vista Energy Marketing, L.P.	140	68	40	21	90	109	14	482			\$ 2,000	0.41%
5	Spark Energy Gas, LLC	76	61	36	98	116	69	19	475	3,385	69.6%	\$ 28,000	5.89%
6	United Energy Trading, LLC	10	7	18	57	112	117	39	360			\$ 1,000	0.48%
7	Just Energy Solutions Inc.	150	49	6		1	3	1	210			\$ 1,000	0.48%
8	StateWise Energy California, LLC		12	12	6	27	122	16	195			\$ 1,000	0.48%
9	Wave Energy LLC					11	129	53	193			\$ 27,000	13.99%
10	Peak Six Power and Gas, LLC	65	32	7	3	7	10		124			\$ 26,000	22.81%
11	Smart One Energy LLC	86	18	5		4	1		114			\$ 1,000	1.05%
12	Greenwave Energy LCC (a "dba" of United Energy Trading)	27	15	24	13		5	11	95			\$ 1,000	1.05%
13	Big Tree Energy CA LLC						46	19	65			\$ 1,000	1.54%
14	National Gas & Electric, LLC		6	11	15	8	4		44				
15	Symmetry Energy Solutions, LLC	1	4	2	1	22	0		30				
16	Ambit California, LLC	4	4	1	4	4	2		19				
17	XOOM Energy California, LLC	3		4	1	1		2	11				
18	Interstate Gas Supply Inc.	1		1	1		1		4				
19	North Star Gas Company, LLC	2	1		1			2	6				
20	Commercial Energy of California Montana, Inc.			1	1		1		3				
21	Clean Energy Renewable Fuels, LLC		1	1					2				
22	Pacific Summit Energy LLC				1				1				
23	Viridian Energy PA						1		1				
CTA Total Abusive Marketing Complaints:		945	821	808	418	666	977	227	4,862				
23 CTA's Monthly Average:		79	68	67	35	56	81	227					
AAA Monthly Average:		8	9	6	2	9	10	17					

Total UEB Penalties: \$ 604,000 12.42%
(No Valid Proof of Enroll Authorization)

Total UEB Enrollment Violations: 604

AAA Natural Gas Penalties as % of Total Penalties: 63.15%

Footnote: AAA Natural Gas and Tiger Natural Gas share the same suite of offices at an address in Tulsa, OK, and share a single Director of Marketing and Customer Service, Rachael Streatly. In addition, Lori Nalley (a.k.a., Lori Johnson) appears to be the owner of both Tiger Natural Gas and AAA Natural Gas.

Source: CPUC "Core Transport Agents Complaint Tracking" website; downloaded March 5, 2025 from www.cpuc.ca.gov/industries-and-topics/natural-gas/retail-gas-markets-and-core-transport-agent/core-transport-agents-ctas---list-and-registration/core-transport-agent-complaint-tracking; and www.cpuc.ca.gov/-/media/cpuc-website/divisions/consumer-protection-and-enforcement-division/documents/ueb/energy-citations/2025/jan-2025-ueb-energy-citations.pdf . Updated: 3/5/2025.