

Original CRS Case Number	Version
12 - 1894 -EL-CRS	May 2016

RENEWAL APPLICATION FOR RETAIL GENERATION PROVIDERS AND POWER MARKETERS

Please print or type all required information. Identify all attachments with an exhibit label and title (Example: Exhibit C-10 Corporate Structure). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division; 180 East Broad Street, Columbus, Ohio 43215-3793.

**This PDF form is designed so that you may input information directly onto the form.
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A. RENEWAL INFORMATION

A-1 Applicant intends to be renewed as: (check all that apply)

- ☒ Retail Generation Provider
 ☐ Power Broker
☐ Power Marketer
 ☐ Aggregator

A-2 Applicant's legal name, address, telephone number, PUCO certificate number, and web site address

Legal Name Hudson Energy Services, LLC
 Address 5251 Westheimer Road, Suite 1000, Houston, TX 77056
 PUCO Certificate # and Date Certified Certificate 12-538E(4) - 7/23/2018
 Telephone # (845) 228-3429 Web site address (if any) www.hudsonenergy.net

A-3 List name, address, telephone number and web site address under which Applicant does business in Ohio

Legal Name Hudson Energy Services, LLC
 Address 4614 Prospect Avenue, Suite 300 Cleveland, OH 44103
 Telephone # (845) 228-3400 Web site address (if any) www.hudsonenergy.net

A-4 List all names under which the applicant does business in North America

Hudson Energy Services, LLC
Hudson Energy Canada Corp.

A-5 Contact person for regulatory or emergency matters

Name Inger Goodman
Title Manager Regulatory Affairs
Business address 5251 Westheimer Road, Suite 10714-425-106300, Houston, TX 77058
Telephone # (714) 425-1063 Fax # (866) 299-3749
E-mail address iGoodman@justenergy.com

A-6 Contact person for Commission Staff use in investigating customer complaints

Name Vanessa Anesetti-Parra
Title Director Corporate and Consumer Affairs
Business address 80 Courtneypark Drive West, Unit 3 & 4, Mississauga, ON L5W 1C1
Telephone # (905) 795-3574 Fax # (866) 299-3749
E-mail address OH_customerfeedback@hudsonenergy.com

A-7 Applicant's address and toll-free number for customer service and complaints

Customer Service address P.O Box 142109 Irving, TX 75014
Toll-free Telephone # (866) 483-7664 Fax # (866) 729-3822
E-mail address HudsonEnergyCare@hudsonenergy.com

A-8 Applicant's federal employer identification number # 161626267

A-9 Applicant's form of ownership (check one)

- | | |
|--|---|
| <input type="checkbox"/> Sole Proprietorship | <input type="checkbox"/> Partnership |
| <input type="checkbox"/> Limited Liability Partnership (LLP) | <input checked="" type="checkbox"/> Limited Liability Company (LLC) |
| <input type="checkbox"/> Corporation | <input type="checkbox"/> Other _____ |

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

A-10 Exhibit A-10 "Principal Officers, Directors & Partners" provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.

B. MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- B-1** **Exhibit B-1 “Jurisdictions of Operation,”** provide a list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail or wholesale electric services.
- B-2** **Exhibit B-2 "Experience & Plans,"** provide a description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Section 4928.10 of the Revised Code.
- B-3** **Exhibit B-3 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocation of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational status or ability to provide the services it is seeking to be certified to provide.
- B-4** Disclose whether the applicant, a predecessor of the applicant, or any principal officer of the applicant have ever been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.
☒ No ☐ Yes

If yes, provide a separate attachment labeled as **Exhibit B-4 "Disclosure of Consumer Protection Violations"** detailing such violation(s) and providing all relevant documents.

- B-5** Disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail or wholesale electric service denied, curtailed, suspended, revoked, or cancelled within the past two years.
☒ No ☐ Yes

If yes, provide a separate attachment labeled as **Exhibit B-5 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation"** detailing such action(s) and providing all relevant documents.

C. FINANCIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- C-1** **Exhibit C-1 “Annual Reports,”** provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information in Exhibit C-1 or indicate that Exhibit C-1 is not applicable and why. (This is generally only applicable to publicly traded companies who publish annual reports.)

- C-2 Exhibit C-2 “SEC Filings,”** provide the most recent 10-K/8-K Filings with the SEC. If the applicant does not have such filings, it may submit those of its parent company. An applicant may submit a current link to the filings or provide them in paper form. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 that the applicant is not required to file with the SEC and why.
- C-3 Exhibit C-3 “Financial Statements,”** provide copies of the applicant’s two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer certified financial statements covering the life of the business. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns (with social security numbers and account numbers redacted).
- C-4 Exhibit C-4 “Financial Arrangements,”** provide copies of the applicant's financial arrangements to conduct CRES as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.,).

Renewal applicants can fulfill the requirements of Exhibit C-4 by providing a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU’s collateral requirements.

First time applicants or applicants whose certificate has expired as well as renewal applicants can meet the requirement by one of the following methods:

1. The applicant itself stating that it is investment grade rated by Moody’s, Standard & Poor’s or Fitch and provide evidence of rating from the rating agencies.
2. Have a parent company or third party that is investment grade rated by Moody’s, Standard & Poor’s or Fitch guarantee the financial obligations of the applicant to the LDU(s).
3. Have a parent company or third party that is not investment grade rated by Moody’s, Standard & Poor’s or Fitch but has substantial financial wherewithal in the opinion of the Staff reviewer to guarantee the financial obligations of the applicant to the LDU(s). The guarantor company’s financials must be included in the application if the applicant is relying on this option.
4. Posting a Letter of Credit with the LDU(s) as the beneficiary.

If the applicant is not taking title to the electricity or natural gas, enter "N/A" in Exhibit C-4. An N/A response is only applicable for applicants seeking to be certified as an aggregator or broker.

- C-5** **Exhibit C-5 “Forecasted Financial Statements,”** provide two years of forecasted income statements for the applicant’s **ELECTRIC related business activities in the state of Ohio Only**, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer. The forecasts should be in an annualized format for the two years succeeding the Application year.
- C-6** **Exhibit C-6 “Credit Rating,”** provide a statement disclosing the applicant’s credit rating as reported by two of the following organizations: Duff & Phelps, Fitch IBCA, Moody’s Investors Service, Standard & Poor’s, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or an affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant’s parent or affiliate organization that guarantees the obligations of the applicant. If an applicant or its parent does not have such a credit rating, enter “N/A” in Exhibit C-6.
- C-7** **Exhibit C-7 “Credit Report,”** provide a copy of the applicant’s credit report from Experian, Dun and Bradstreet or a similar organization. An applicant that provides an investment grade credit rating for Exhibit C-6 may enter “N/A” for Exhibit C-7.
- C-8** **Exhibit C-8 “Bankruptcy Information,”** provide a list and description of any reorganizations, protection from creditors or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or within the two most recent years preceding the application.
- C-9** **Exhibit C-9 “Merger Information,”** provide a statement describing any dissolution or merger or acquisition of the applicant within the two most recent years preceding the application.
- C-10** **Exhibit C-10 “Corporate Structure,”** provide a description of the applicant’s corporate structure, not an internal organizational chart, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required and applicant may respond by stating that they are a stand-alone entity with no affiliate or subsidiary companies.

D. TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED:

- D-1 Exhibit D-1 “Operations”** provide a written description of the operational nature of the applicant’s business. Please include whether the applicant’s operations include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services as well as other services used to arrange for the purchase and delivery of electricity to retail customers.
- D-2 Exhibit D-2 “Operations Expertise,”** given the operational nature of the applicant’s business, provide evidence of the applicant’s experience and technical expertise in performing such operations.
- D-3 Exhibit D-3 “Key Technical Personnel,”** provide the names, titles, e-mail addresses, telephone numbers, and the background of key personnel involved in the operational aspects of the applicant’s business.
- D-4 Exhibit D-4 “FERC Power Marketer License Number,”** provide a statement disclosing the applicant’s FERC Power Marketer License number. (Power Marketers only)

Jeff Shoaf
Signature of Applicant and Title



06/11/2020
12:08 PM EDT

AFFIDAVIT

1. The Applicant herein, attests under penalty of false statement that all statements made in the application for certification renewal are true and complete and that it will amend its application while the application is pending if any substantial changes occur regarding the information provided in the application.
2. The Applicant herein, attests it will timely file an annual report with the Public Utilities Commission of Ohio of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Division (A) of Section 4905.10, Division (A) of Section 4911.18, and Division (F) of Section 4928.06 of the Revised Code.
3. The Applicant herein, attests that it will timely pay any assessments made pursuant to Sections 4905.10, 4911.18, or Division F of Section 4928.06 of the Revised Code.
4. The Applicant herein, attests that it will comply with all Public Utilities Commission of Ohio rules or orders as adopted pursuant to Chapter 4928 of the Revised Code.
5. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, and its Staff on any utility matter including the investigation of any consumer complaint regarding any service offered or provided by the Applicant.
6. The Applicant herein, attests that it will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
7. The Applicant herein, attests that it will fully comply with Section 4928.09 of the Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
8. The Applicant herein, attests that it will use its best efforts to verify that any entity with whom it has a contractual relationship to purchase power is in compliance with all applicable licensing requirements of the Federal Energy Regulatory Commission and the Public Utilities Commission of Ohio.
9. The Applicant herein, attests that it will cooperate fully with the Public Utilities Commission of Ohio, the electric distribution companies, the regional transmission entities, and other electric suppliers in the event of an emergency condition that may jeopardize the safety and reliability of the electric service in accordance with the emergency plans and other procedures as may be determined appropriate by the Commission.
10. If applicable to the service(s) the Applicant will provide, the Applicant herein, attests that it will adhere to the reliability standards of (1) the North American Electric Reliability Council (NERC), (2) the appropriate regional reliability council(s), and (3) the Public Utilities Commission of Ohio. (Only applicable if pertains to the services the Applicant is offering)

11. The Applicant herein, attests that it will inform the Commission of any material change to the information supplied in the renewal application within 30 days of such material change, including any change in contact person for regulatory purposes or contact person for Staff use in investigating customer complaints.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief and that he/she expects said Applicant to be able to prove the same at any hearing hereof.


Jeff Shoaf  06/11/2020
Signature of Affiant & Title 12:08 PM EDT

NOTARIAL CERTIFICATE (JURAT)

Sworn to before me and subscribed in my presence via on line notarization pursuant to Ohio Revised Code Section 147.60 et seq by Jeff Shoaf this 11th day of June 2020. This is a jurat certificate; an oath was administered to the signer.



CHRISTOPHER M. BLINN
Notary Public, State of Ohio
My Commission Expires
October 30, 2020

Christopher Blinn  06/11/2020
Christopher M. Blinn, Paralegal 12:11 PM EDT
Ohio Online Notary Public
Columbus, Ohio

Online Notary Public. This notarial act involved the use of online audio/video communication technology.

Exhibit A-10 “Principal Officers, Directors and Partners”

Name of Officer	Position	Address
R. Scott Gahn	Chief Executive Officer	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
James Brown	Chief Financial Officer	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
Jonah Davids	EVP, General Counsel and Corporate Secretary	80 Courtneypark Drive West, Unit 3 & 4, Mississauga, ON L5W 0B3
Brent Moore	EVP, North American Retail	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
Jeff Shoaf	President	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
Margaret Munnelly	SVP, Human Resources	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
Amir Andani	Chief Risk Officer	80 Courtneypark Drive West, Unit 3 & 4, Mississauga, ON L5W 0B3
John Marcinko	EVP, Supply and Load Forecasting	80 Courtneypark Drive West, Unit 3 & 4, Mississauga, ON L5W 0B3
Sean Holland	VP, Operations	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
William Graham	VP, Direct Channel Sales (Commercial)	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
Karra Marino	VP, Affinity Brands and Alternative Channels	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056
Kevin Malone	VP, US Commercial Broker Channel	Suite 1000 – 5251 Westheimer Road, Houston, Texas, U.S. 77056

Exhibit B-1 “Jurisdictions of Operation”

Affiliate	Province/State	License Type	License Order/Docket #
Hudson Energy Services, LLC	Maryland	Electric /Broker	IR-1114
Hudson Energy Services, LLC	Maryland	Gas	IR-1120
Interactive Energy Group LLC	Maryland	Electric	IR-3982
Interactive Energy Group LLC	Maryland	Gas	IR-3980
Interactive Energy Group LLC	Massachusetts	Electric	EB-433
Interactive Energy Group LLC	Massachusetts	Gas	RA-200
Just Energy Massachusetts Corp.	Massachusetts	Electric	CS-069
Hudson Energy Services, LLC	Massachusetts	Electric	CS-061
Hudson Energy Services, LLC	Massachusetts	Gas	GS-034
Just Energy Solutions Inc.	Michigan	Electric	U-13203
Just Energy Michigan Corp.	Michigan	Gas	U-15980
Just Energy Solutions Inc.	Nevada	Gas	G-13 Sub 1
Just Energy Solutions Inc.	New Jersey	Gas	GSL-0116
Just Energy Solutions Inc.	New Jersey	Electric	ESL-0046
Hudson Energy Services, LLC	New Jersey	Gas	GSL- 0069
Hudson Energy Services, LLC	New Jersey	Electric	ESL - 0083
Interactive Energy Group LLC	New Jersey	Energy Agent	Eaf-0484
Just Energy New York Corp.	New York	Electric	Approved ESCO

Affiliate	Province/State	License Type	License Order/Docket #
Just Energy New York Corp.	New York	Gas	Approved ESCO
Just Energy Solutions Inc.	New York	Electric	Approved ESCO
Just Energy Solutions Inc.	New York	Gas	Approved ESCO
Hudson Energy Services, LLC	New York	Gas	Approved ESCO
Hudson Energy Services, LLC	New York	Electric	Approved ESCO
Interactive Energy Group LLC	Ohio	Gas	Certificate 17-624G (2)
Interactive Energy Group LLC	Ohio	Electric	Approved Broker Certificate 17-1266E (2)
Just Energy Solutions Inc.	Ohio	Electric	Certificate 01-1123-EL-CRS
Just Energy Solutions Inc.	Ohio	Gas	Certificate 02-023G (9)
Hudson Energy Services, LLC	Ohio	Gas	Certificate 12-271G (4)
Hudson Energy Services, LLC	Ohio	Electric	Certificate 12-538 E (4)
Universal Energy Corporation	Ontario	Electric	ER-2016-0332
Universal Energy Corporation	Ontario	Gas	GM-2016-0261
Just Energy Ontario L.P.	Ontario	Gas	GM-2015-0119
Just Energy Ontario L.P.	Ontario	Electric	ER-2015-0118
Hudson Energy Canada Corp.	Ontario	Electric	ER-2015-0125
Hudson Energy Canada Corp.	Ontario	Gas	GM-2015-0124
Just Energy New York Corp.	Ontario	Electric Wholesaler	EW-2019-0108
Just Energy Solutions Inc.	Ontario	Electric Wholesaler	EW-2016-0149

Affiliate	Province/State	License Type	License Order/Docket #
Just Energy Solutions Inc.	Pennsylvania	Electric (PECO)	A-110117
Just Energy Solutions Inc.	Pennsylvania	Gas (PECO)	A-125138
Just Energy Pennsylvania Corp.	Pennsylvania	Gas (Columbia)	A-2009-2098011
Just Energy Pennsylvania Corp.	Pennsylvania	Electric (Duquesne)	A-2009-2097544
Hudson Energy Services, LLC	Pennsylvania	Electric	A-2010-2192137
Hudson Energy Services, LLC	Pennsylvania	Gas	A-2018-3002121
Interactive Energy Group LLC	Pennsylvania	Gas	A-2017-2634175
Interactive Energy Group LLC	Pennsylvania	Electric	A-2017-2635016
Just Energy Quebec L.P /Juste Energie Quebec S.E.C	Quebec	Gas	No license requirement
Hudson Energy Canada Corp./Energie Hudson Canada	Quebec	Gas	No license requirement
Hudson Energy Canada Corp.	Saskatchewan	Gas	No license requirement
Just Energy Prairies L.P.	Saskatchewan	Direct Seller	Direct Sellers license # 328505
Fulcrum Retail Energy, LLC	Texas	Electric	REP Certification No. 10081
Just Energy Texas L.P.	Texas	Electric	REP Certification No. 10052
Hudson Energy Services, LLC	Texas	Electric	REP Certification No. 10092
Tara Energy, LLC	Texas	Electric	REP Certification No. 10052
Just Energy Solutions Inc.	Virginia	Gas	G-30
Just Energy Solutions Inc.	Virginia	Electric	E-26
Just Energy U.S. Corp	US Federal	Electric	FERC - ER10-379

Affiliate	Province/State	License Type	License Order/Docket #
Just Energy Solutions Inc.	US Federal	Electric	FERC - ER97-4253
Just Energy New York Corp.	US Federal	Electric	FERC - ER13-1081-000
Just Energy Illinois Corp.	US Federal	Electric	FERC - ER13-1104-000
Just Energy Pennsylvania Corp.	US Federal	Electric	FERC- ER17-2428-000
Just Energy Texas L.P.	US Federal	Electric	FERC-ER17-2429-000
Hudson Energy Services, LLC	US Federal	Electric	FERC-ER17-2427-000

Exhibit B-2 “Experience & Plans”

Experience

Hudson Energy has been servicing customers in various markets for 14 years and offers a wide variety of solutions to its electricity customers, including fixed-price and variable-price products on both short-term and longer-term contracts. Some of these products provide customers with price-protection programs for the majority of their requirements.

Hudson Energy purchases power supply through physical or financial transactions with market counterparties as commercial customer load is contracted. The LDC provides historical customer usage which, when normalized to average weather, enables the company to purchase the required energy to expected normal customer load. Furthermore, Hudson Energy mitigates exposure to weather variations through active management of the power portfolio. The expected cost of this strategy is incorporated into the price to the customer.

Customers

Hudson Energy generally targets and serves commercial customers with annual consumption over 15,000 kWh. These sales are made through several channels: inside commercial sales representatives, outside commercial sales representatives, third party vendors and sales through a broker channel. Products offered to commercial customers can range from standard fixed offerings to “one off” offerings, which are tailored to meet the customer’s specific needs. These products can be either fixed, variable, a floating rate or a blend of the two, and normally have terms of less than five years.

Plans & Services

In Ohio, Hudson Energy currently serves electricity and have agreements in place with the following utilities under the utility consolidated bill ready option and/or separate retailer dual bill options:

The Illuminating Company
Ohio Edison
Toledo Edison
Dayton Power & Light
Duke Energy Ohio
Ohio Power

Hudson plans to provide consolidated billing in a bill ready format through each utility in Ohio. Customer account management and billing is performed through a third-party software system that is also used in other markets. Direct billing will be made available to select customers where appropriate given the applicant’s business rules and permitted according to regulatory requirements and specific utility practices.

Complaint Handling

Hudson will make every effort to be the first point of contact in dealing with customer inquiries and complaints. As such Hudson currently has a two-tier system which consists of a Customer Service department and a Corporate and Consumer Relations department (“CCR”).

The customer service department serves as the first point of contact for all customer related inquiries and complaints. Hudson account managers will respond to all customer service questions, complaints, billing questions, and customer account transfers as well as general customer inquiries in accordance with Commission rules adopted pursuant to Section 4928.10 of the Revised Code. Hudson is also equipped to record customer calls digitally in order to ensure accuracy and compliance. The Corporate & Consumer Relations department oversees and manages all escalated customer inquiries and complaints ranging from informal or formal complaint filed through regulatory bodies, utilities and/or other third-party groups. The

CCR department is also committed to regularly reviewing complaint activity to identify trends and problem areas. They also review marketing and training materials on a regular basis, and work with all internal teams at Hudson Energy to ensure adherence to required guidelines and timely resolution of customer inquiries.

Hudson will adhere to *Public Utilities Commission of Ohio* (“PUCO”) guidelines when handling complaints filed through its Consumer Services Division.

Key Personnel

High levels of customer satisfaction are achieved through rapid and accurate responses to customer questions that come in via telephone and/or electronic mail. Our customer service representatives are supported by strong training in our product, and the energy market as well as by a robust database system. Additionally, the CCR department is trained and kept up to date concerning local and State regulations and/or guidelines.

Exhibit B-3 “Disclosure of Liabilities and Investigations”

Hudson Energy Services LLC does not believe there are any matters that could adversely impact its financial or operational status or its ability to provide services to customers. But in the interest of full disclosure the following are particulars of penalties, fines, and voluntary payments for the applicant, its parent company and U.S. and Canadian affiliates or predecessors resulting from proceedings by name, subject and citation, dealing with business operations, in the last five (5) years, whether before an administrative body or in a judicial forum, in which an affiliate, a predecessor or either, has been a defendant or a respondent.

1. Docket 49688: Settlement Agreement and Report to Commission Relating to Commission Staff's Investigation of Just Energy Texas Affiliate Companies:

On October 11, 2019, Commissioners gave final approval of a settlement reached between Just Energy Texas, Amigo Energy and Tara Energy and the PUCT's Office of Oversight and Enforcement Staff ("O&E"). The settlement addressed: (1) issues identified in the audit of JE and Amigo's LITE UP low-income discount administration, and (2) use of switch-holds for deferred payment arrangements. The issues related to low income were primarily related to JE's process for identifying eligible customers, and the issues related to switch-holds focused on the number of days to lift a switch-hold after deferred payment arrangements were satisfied. In July 2019 the settlement was filed for consideration by the commissioners. The commissioner order approves the settlement's aggregate penalty to the Just Energy companies for \$700,000, with \$225,000 of this aggregate amount to be directed to bill payment assistance agencies and customers needing help paying electric bills.

2. Texas Docket No. 49688:

In June 2019, Just Energy, Amigo Energy and Tara Energy (Companies) filed an agreement with the Staff of the Public Utility Commission of Texas (PUCT Staff) to resolve outstanding questions dating back to 2013 and 2014 regarding issues related to customer switch-holds, and rules surrounding calculations for customer discounts that have since been repealed. The Companies voluntarily stopped placing switch-holds (and have not yet resumed) and maintain that the methodology for calculating customer discounts was correct. PUCT Staff and the Companies agreed to a combined penalty consisting of \$475,000 to be paid directly to the State, and \$225,000 to be paid to customer assistance agencies to be used for bill payment assistance for customers. The agreement is currently awaiting final review and approval by the PUCT Chairman and Commissioners.

3. Investigation No 2018110002

In July 2019 PUCT enforcement staff notified Amigo that it concluded an investigation into Amigo customer billing, specifically customers billed amounts that were allegedly higher than the price disclosed, and in some cases higher than what the customer authorized back in the summer of 2018. Amigo will provide staff a report, by customer, of the amount of refunds by customer, and the method each was provided.

4. Investigation Nos. 2018030005, 2018030007, 2018030009

In September 2018 PUCT, enforcement staff notified Just Energy, Amigo Energy and Tara Energy that it had concluded an investigation of compliance with bill payment assistance rules,

both the collection of funds and disbursement to assistance agencies. No issues were identified by the Commission.

5. Pennsylvania

2017 Tentative Order from the Pennsylvania Public Utility Commission to cancel the license of Just Energy Solutions due to an expired financial security. The error was corrected upon receipt of the notice and license is currently in good standing.

6. Ohio Case No. 16-2006-GE-UNC

In the Matter of Commerce Energy, Inc. dba Just Energy: On October 11, 2016, Just Energy and the Staff of the Public Utilities Commission of Ohio entered a joint stipulation resolving all matters identified by staff in a November Notice of Probable Non-Compliance. On November 2, 2016, the Commission accepted the stipulation.

Moving forward there are no requirements on Just Energy as the issues have been resolved and the reporting window has expired. Since that time, we have not received anything from the Commission besides the usual customer complaint.

7. Georgia

In April 2016, Just Energy Solutions Inc. (formerly known as Commerce Energy Inc.) received a data request from the Georgia Public Service Commission related to complaints received resulting from Just Energy's third-party telemarketer's sales performed on behalf of Just Energy between December 2015 and February 2016. The complaints alleged failure to explain or inform consumers about the services sold and improper authorization to switch consumers to Just Energy. Just Energy reached a settlement with the Commission and agreed to a joint stipulation and final resolution in November 2016, which was adopted on January 17, 2017. Just Energy agreed in the stipulation to the following:

- Pay a total of \$150,000 to customers specified by the Commission.
- Submit monthly reports to the Commission on the customer's paid.
- Provide notice to affected customers giving customers the right to cancel or chose another provider with no exit fee.
- Report to the Commission on any new marketing campaign for a period of 1 year from date of stipulation.
- Provide training on Georgia market rules and product offerings.
- Pay penalty amount of \$25,000.

8. California

There are not enough sellers in the market for Just Energy Solutions Inc. to be able to purchase all of the Resource Adequacy (aka – capacity or RA) needed. As a result, Just Energy Solutions Inc. incurs penalties for any shortages. There are 3 types of RA: system, local and flexible. For the year ahead, 100% of estimated local RA is required and 90% System and Flexible resources during the summer months are required. For the monthly filings retailers must demonstrate they have procured 100% of their monthly System and Flexible RA obligation. Fines are imposed for deficiencies in both the year ahead and in the month ahead part of the process.

Fines are on a per KW month basis or flat fee. JE seeks waivers for fines, where applicable and possible. JE has estimated the fines and incorporated them into pricing curves. From a reliability standpoint, no shortage was ever experienced, as there is a CAISO backstop capacity mechanism in place to cover shortages. For calendar year 2019, as of August 1st, the total amount of fines is \$488,249.60. Just Energy received recently assigned substantially reduced capacity allocations for energy years 2020-2022.

9. California

On February 12, 2019, Just Energy Solutions Inc. (Just Energy) received a cease and desist notice from the California Public Utilities Commission's Consumer Protection and Enforcement Division (CPUC) referencing eight customer complaints. The notice directed Just Energy to cease and desist from 1) posing as employees of the utility, 2) misrepresenting the purpose of the door-to-door knock, 3) not presenting proper identification, 4) misrepresenting the cost of service, 5) soliciting consumers that don't want to be contacted, and 6) misquoting bill savings. After the CPUC sent the cease and desist letter, Just Energy realized that it had not received all of the customer complaints from the CPUC; Just Energy only ever received three of the eight complaints. Just Energy submitted a written response to the CPUC on 4/29/2019 communicating improved processes and controls as follows: added a "we are not the utility" stamp to the customer contracts, additional training requiring agents to wear a bright yellow vest with logo and an ID badge and training to not promise savings. Changes were also made to Just Energy's independent third-party verification call to reinforce to customers that Just Energy is not the utility, utility delivery charges are in addition to supply charges, and that Just Energy does not promise savings. Just Energy also provided the CPUC with contact information to enable Staff to communicate all complaints to Just Energy in the future.

10. California

On July 1, 2019, Just Energy received a notice from the CPUC alleging that Just Energy representatives was using aggressive sales tactics. Just Energy Solutions Inc. submitted a response to the CPUC on 7/19/2019 with the revised internal sales and training processes including Just Energy's "Do Not Contact" policy, the third-party verification script, the non-English speaking customer policy, and the acceptable sales and marketing practices training script.

Exhibit C-1 “Annual Reports”

Financial data is maintained on a consolidated company basis and therefore cannot be produced to reflect Hudson Energy Services, LLC business only.

Just Energy’s Annual Report can be found in electronic format on their investor relations website at:

<https://investors.justenergy.com/financials/quarterly-results-annual-reports>

All of Just Energy’s financial reports and public disclosures can be found at:

<http://justenergygroup.com/>

Exhibit C-2 “SEC Filings”

Please refer to Exhibit C-1 “Annual Reports” of this application.

Exhibit C-3 “Financial Statements”

Please refer to Exhibit C-1 “Annual Reports” of this application.

Exhibit C-4 “Financial Arrangements”

This exhibit contains confidential and proprietary information and is being submitted under seal.

Exhibit C-5 “Forecasted Financial Statements”

This exhibit contains confidential and proprietary information and is being submitted under seal.

Exhibit C-6 “Credit Rating”

Neither Hudson nor its parent or affiliate organization is rated by Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody’s Investors Service, Standard & Poors, or a similar organization.

Exhibit C-7 “Credit Report”

This exhibit contains confidential and proprietary information and is being submitted under seal.

Exhibit C-8 “Bankruptcy Information”

Hudson Energy Services LLC has never filed and/or reported reorganizations, protection from creditors, or any other form of bankruptcy filings.

Exhibit C-9 “Merger Information”

Currently, nothing to report.

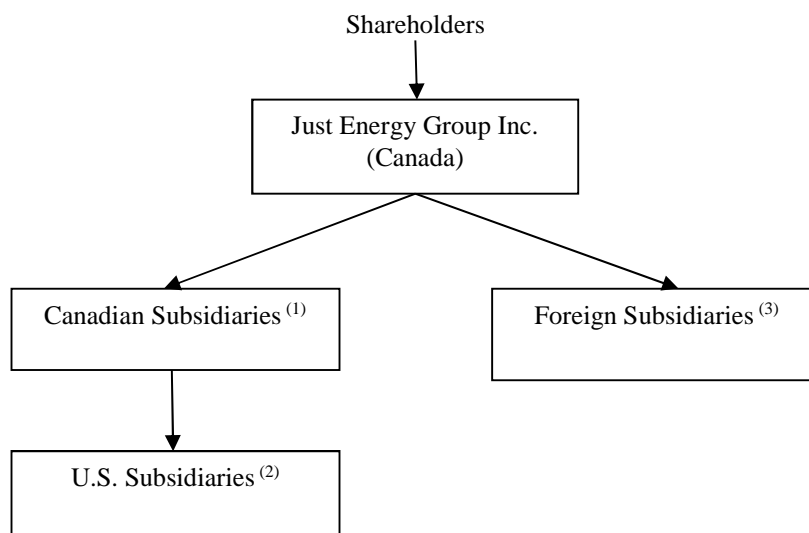
Exhibit C-10 “Corporate Structure”

Hudson Energy is a limited liability company formed under the laws of New Jersey. Hudson Energy’s headquarters is located in Texas with offices in New York, Ohio, California, Illinois and Toronto. Its parent company, Just Energy Group Inc. (Just Energy) is a corporation established under the laws of Canada. Just Energy is a publicly traded corporation (NYSE:JE and TSX: JE) and parent to affiliate companies: Amigo Energy, Commerce Energy, Hudson Energy, JE Solar and Tara Energy.

Attached is an organizational chart depicting the parent company’s full corporate structure as well as a diagram that sets forth the simplified organizational structure of Just Energy and its subsidiaries as of May 2020.

Organizational Structure of the Company

The following diagram sets forth the simplified organizational structure of the Company.



Notes:

- (1) The Canadian Subsidiaries are corporations, limited partnerships, and unlimited liability companies directly or indirectly wholly-owned by the Company. The Canadian operating Subsidiaries are Just Energy Ontario L.P. (Ontario); Just Energy Alberta L.P. (Alberta); Just Green L.P. (Alberta); Just Energy Manitoba L.P. (Manitoba); Just Energy B.C. Limited Partnership (British Columbia); Just Energy Québec L.P. (Quebec); Just Energy Prairies L.P. (Manitoba); Just Energy Trading L.P. (Ontario); Hudson Energy Canada Corp. (Canada); Filter Group Inc. and Just Energy Advanced Solutions Corp. (Ontario). Just Energy Corp. is the general partner of each of the Canadian operating limited partnerships. Additionally, the Company indirectly holds an approximate 7.8% fully diluted interest in ecobee Inc., a manufacturer and distributor of smart thermostats located in Toronto, Ontario.
- (2) The U.S. Subsidiaries are corporations, limited liability companies and limited partnerships indirectly wholly-owned by the Company and are incorporated or formed, as applicable, under the laws of the State of Delaware, unless otherwise noted. The U.S. operating Subsidiaries are Just Energy (U.S.) Corp.; Just Energy Illinois Corp.; Just Energy Indiana Corp.; Just Energy Massachusetts Corp.; Just Energy New York Corp.; Just Energy Texas I Corp.; Just Energy Texas LP (Texas); Just Energy Pennsylvania Corp.; Just Energy Solutions Inc. (California); Just Energy Marketing Corp.; Just Energy Michigan Corp.; Hudson Energy Services LLC (New Jersey); Just Energy Limited; Fulcrum Retail Energy LLC (Texas); Tara Energy, LLC (Texas); Interactive Energy Group LLC; Just Solar Holdings Corp; Filter Group USA Inc. and EdgePower Inc.
- (3) Foreign Subsidiaries. Just Energy Deutschland GmbH is an indirect subsidiary of the Company operating in Germany.

Exhibit D-1 “Operations”

Hudson is a third-party electricity and natural gas supplier that provides customer choice and competitive pricing to businesses. The applicant contracts bilaterally with wholesale energy suppliers to serve its retail load and to fulfill other requirements, such as completing power supply contracts, maintaining adequate natural gas storage and balancing supply pools. Contract purchases range from daily spot structures to yearly supply acquisitions.

Hudson manages its own customer back office functions including accepting new customer contracts, enrolling accounts with local utility companies, calculating bills, and responding to customer inquiries. These functions are managed primarily by staff located in Texas.

Exhibit D-2 “Operations Expertise”

Hudson operations department handles nominations and scheduling of the purchases referenced in Exhibit D-1, retail load and other company requirements. In power in Ohio (PJM), we determine all volumes for scheduling and a counter-party enters the volumes. The analysts monitor the individual markets and the marketplace closely. This department is shared among all affiliates of Just Energy Group and as such also manages the operations for Hudson Energy Services, LLC, which is currently active in Ohio.

Exhibit D-3 “Key Technical Personnel”

Scott Gahn – Chief Executive Officer

R. Scott Gahn was appointed President and Chief Executive Officer of Just Energy in August 2019. Mr. Gahn has a long history in the deregulated energy industry, having served on the Electric Reliability Council of Texas board from 2005 to 2008 and having been involved in the sale of deregulated and regulated electricity and natural gas for over 28 years. He was one of the founding shareholders and Chief Executive Officer of Just Energy Texas LP, which was acquired by the Company in 2007. Following the acquisition, Mr. Gahn was the Chief Operating Officer of Just Energy until June 2011 and was appointed to the Just Energy board on December 17, 2013.

Jim Brown – Chief Financial Officer

Jim Brown was appointed as Chief Financial Officer in April 2018 and joined Just Energy in April 2013 as a Senior Vice President responsible for commodity settlements, and most recently served as the President of Hudson Energy, responsible for Just Energy's commercial business. Prior to joining Just Energy, he was the Vice President of Accounting and Finance for Gexa Energy, a subsidiary of Nextera Energy Inc. Prior to that Mr. Brown was a Vice President of Accounting at Constellation Energy Resources Group from January 2007. Mr. Brown graduated from the University of Houston with a Bachelor of Business Administration in Accounting in 1992 and has been a Certified Public Accountant in Texas since 1996.

Jonah Davids – EVP, General Counsel and Corporate Secretary

Jonah is currently the Executive Vice President, General Counsel and Corporate Secretary for Just Energy Corp, marketers of natural gas and electricity to residential and commercial customers in Canada and the United States. Prior to joining Just Energy, Jonah practiced with McMillan LLP in the corporate and natural resources groups. Jonah received his LLB from the University of Western Ontario in 2000 and an LLM in Natural Resources from the University of Dundee, Scotland in 2005. He is admitted to the bar in the Province of Ontario.

Brent Moore - EVP President North America

Brent Moore joined Just Energy in 2017. He was appointed President for Just Energy's North American retail business in April 2019. With over 16 years of sales, marketing, and general management experience in retail energy, Brent was the founder and CEO of Save On Energy, which he grew to be the largest marketplace for US commercial and residential consumers in deregulated markets to shop and purchase energy. Prior, Brent served in various senior executive and business development roles in the telecommunications industry. Moore obtained a Bachelor of Arts degree from Texas State University of San Marcos in 1994.

Exhibit D-4 “FERC Power Marketer License Number”

Hudson is a registered FERC Power Marketer and the Docket No. is ER17-2427-000.

This foregoing document was electronically filed with the Public Utilities

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Summary: Application to Renew Certification electronically filed by Mrs. Gretchen L. Petrucci on behalf of Hudson Energy Services, LLC