



Date Received	Renewal Certification Number	ORIGINAL CRS Case Number
	02-023G (7)	02 - 1828 - GA-CRS

RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS SUPPLIERS

Please **type or print** all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit A-15 - Company History*). 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 directly input information onto the form. You may also download the form by saving it to your local disk.

SECTION A - APPLICANT INFORMATION AND SERVICES

A-1 Applicant intends to renew its certificate as: (check all that apply)

☐ Retail Natural Gas Aggregator ☐ Retail Natural Gas Broker ☒ Retail Natural Gas Marketer

A-2 Applicant information:

Legal Name Just Energy Solutions Inc.
Address 5251 Westheimer RD #1000, Houston, TX 77056
Telephone No. 905-670-4440 Web site Address www.justenergy.com
Current PUCO Certificate No. 02-023G (9) Effective Dates January 16, 2019 - January 16, 2021

A-3 Applicant information under which applicant will do business in Ohio:

Name Just Energy Solutions Inc.
Address 4614 Prospect Avenue, Suite 300 Cleveland, OH 44103
Web site Address www.justenergy.com Telephone No. 845.228.3400

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

Just Energy	

A-5 Contact person for regulatory or emergency matters:

Name Inger Goodman Title Manager Regulatory Affairs
Business Address 5251 Westheimer Rd #1000, Houston, TX 77056
Telephone No. 714.425.1063 Fax No. Email Address igoodman@justenergy.com

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

Name	Karla Paez	Title	Director of Compliance
Business address	5251 Westheimer Rd #1000, Houston, TX 77056		
Telephone No.	713.850.6790	Fax No.	
Email Address	kpaez@justenergy.com		

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

Customer service address	P.O. Box 2210 Buffalo, New York 14240-2210		
Toll-Free Telephone No.	1-866-587-8674	Fax No.	866-299-3749
Email Address	OH_customerfeedback@just		

A-8 Provide “Proof of an Ohio Office and Employee,” in accordance with Section 4929.22 of the Ohio Revised Code, by listing name, Ohio office address, telephone number, and Web site address of the designated Ohio Employee

Name	Corporation Service Company	Title	
Business address	50 West Broad Street, Suite 1800, Columbus, OH 43215		
Telephone No.	845.228.3400	Fax No.	
Email Address	Regulatory_Administration@justenerg		

A-9 Applicant's federal employer identification number 33-0769555

A-10 Applicant's form of ownership: (Check one)

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

A-11 (Check all that apply) Identify each natural gas company service area in which the applicant is currently providing service or intends to provide service, including identification of each customer class that the applicant is currently serving or intends to serve, for example: *residential, small commercial, and/or large commercial/industrial (mercantile) customers*. (A mercantile customer, as defined in Section 4929.01(L)(1) of the Ohio Revised Code, means a customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within the state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside of this state. In accordance with Section 4929.01(L)(2) of the Ohio Revised Code, “Mercantile customer” excludes a not-for-profit customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within this state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside this state that has filed the necessary declaration with the Public Utilities Commission.)

<input checked="" type="checkbox"/>	Columbia Gas of Ohio	<input checked="" type="checkbox"/>	Residential	<input checked="" type="checkbox"/>	Small Commercial	<input checked="" type="checkbox"/>	Large Commercial / Industrial
<input checked="" type="checkbox"/>	Dominion East Ohio	<input checked="" type="checkbox"/>	Residential	<input checked="" type="checkbox"/>	Small Commercial	<input checked="" type="checkbox"/>	Large Commercial / Industrial
<input checked="" type="checkbox"/>	Duke Energy Ohio	<input checked="" type="checkbox"/>	Residential	<input checked="" type="checkbox"/>	Small Commercial	<input checked="" type="checkbox"/>	Large Commercial / Industrial
<input checked="" type="checkbox"/>	Vectren Energy Delivery of Ohio	<input checked="" type="checkbox"/>	Residential	<input checked="" type="checkbox"/>	Small Commercial	<input checked="" type="checkbox"/>	Large Commercial / Industrial

A-12 If applicant or an affiliated interest previously participated in any of Ohio's Natural Gas Choice Programs, for each service area and customer class, provide approximate start date(s) and/or end date(s) that the applicant began delivering and/or ended services.

☒ **Columbia Gas of Ohio**

<input checked="" type="checkbox"/>	Residential	Beginning Date of Service	7/20/05	End Date	
<input checked="" type="checkbox"/>	Small Commercial	Beginning Date of Service	7/20/05	End Date	
<input checked="" type="checkbox"/>	Large Commercial	Beginning Date of Service	7/20/05	End Date	
<input type="checkbox"/>	Industrial	Beginning Date of Service		End Date	

☒ **Dominion East Ohio**

<input checked="" type="checkbox"/>	Residential	Beginning Date of Service	7/20/05	End Date	
<input checked="" type="checkbox"/>	Small Commercial	Beginning Date of Service	7/20/05	End Date	
<input checked="" type="checkbox"/>	Large Commercial	Beginning Date of Service	7/20/05	End Date	
<input type="checkbox"/>	Industrial	Beginning Date of Service		End Date	

☒ **Duke Energy Ohio**

<input checked="" type="checkbox"/>	Residential	Beginning Date of Service	7/1/11	End Date	
<input checked="" type="checkbox"/>	Small Commercial	Beginning Date of Service	7/1/11	End Date	
<input checked="" type="checkbox"/>	Large Commercial	Beginning Date of Service	7/1/11	End Date	
<input type="checkbox"/>	Industrial	Beginning Date of Service		End Date	

☒ **Vectren Energy Delivery of Ohio**

<input checked="" type="checkbox"/>	Residential	Beginning Date of Service	10/1/12	End Date	
<input checked="" type="checkbox"/>	Small Commercial	Beginning Date of Service	10/1/12	End Date	
<input checked="" type="checkbox"/>	Large Commercial	Beginning Date of Service	10/1/12	End Date	
<input type="checkbox"/>	Industrial	Beginning Date of Service		End Date	

A-13 If not currently participating in any of Ohio's four Natural Gas Choice Programs, provide the approximate start date that the applicant proposes to begin delivering services:

<input type="checkbox"/>	Columbia Gas of Ohio	Intended Start Date	N/A
<input type="checkbox"/>	Dominion East Ohio	Intended Start Date	N/A
<input type="checkbox"/>	Duke Energy Ohio	Intended Start Date	N/A
<input type="checkbox"/>	Vectren Energy Delivery of Ohio	Intended Start Date	N/A

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- A-14 Exhibit A-14 "Principal Officers, Directors & Partners,"** provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.
- A-15 Exhibit A-15 "Company History,"** provide a concise description of the applicant's company history and principal business interests.
- A-16 Exhibit A-16 "Articles of Incorporation and Bylaws,"** provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto, *only if the contents of the originally filed documents changed since the initial application.*
- A-17 Exhibit A-17 "Secretary of State,"** provide evidence that the applicant is still currently registered with the Ohio Secretary of the State.

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- B-1 Exhibit B-1 "Jurisdictions of Operation,"** provide a current 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 natural gas service, or retail/wholesale electric services.
- B-2 Exhibit B-2 "Experience & Plans,"** provide a current 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 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.
- B-3 Exhibit B-3 "Summary of Experience,"** provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking renewed certification (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).
- B-4 Exhibit B-4 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocations 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 for which it is seeking renewed certification since applicant last filed for certification.

- B-5 Exhibit B-5 "Disclosure of Consumer Protection Violations,"** disclose whether the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant has been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws since applicant last filed for certification.

☒ No ☐ Yes

If Yes, provide a separate attachment labeled as **Exhibit B-5 "Disclosure of Consumer Protection Violations,"** detailing such violation(s) and providing all relevant documents.

- B-6 Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation,"** disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, or revoked, or whether the applicant or predecessor has been terminated from any of Ohio's Natural Gas Choice programs, or been in default for failure to deliver natural gas since applicant last filed for certification.

☒ No ☐ Yes

If Yes, provide a separate attachment, labeled as **Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation,"** detailing such action(s) and providing all relevant documents.

SECTION C - APPLICANT 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, labeled as 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 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 current financial arrangements to conduct competitive retail natural gas service (CRNGS) 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 **NATURAL GAS 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 current 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 current 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 within the two most recent years preceding the application.

SECTION D – APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- D-1 Exhibit D-1 "Operations,"** provide a current written description of the operational nature of the applicant's business. Please include whether the applicant's operations will include the contracting of natural gas purchases for retail sales, the nomination and scheduling of retail natural gas for delivery, and the provision of retail ancillary services, as well as other services used to supply natural gas to the natural gas company city gate for retail customers.
- D-2 Exhibit D-2 "Operations Expertise,"** given the operational nature of the applicant's business, provide evidence of the applicant's current experience and technical expertise in performing such operations.
- D-3 Exhibit D-3 "Key Technical Personnel,"** provide the names, titles, email addresses, telephone numbers, and background of key personnel involved in the operational aspects of the applicant's current business.

Applicant Signature and Title

Sean A. Holland VP, Operations

Sworn and subscribed before me this

10th

day of

December

Month

2020

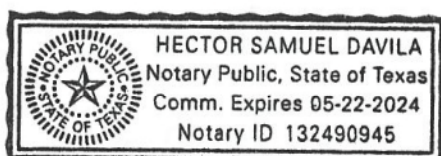
Year

Signature of official administering oath

Hector Davila, Regulatory Affairs Specialist
Print Name and Title

My commission expires on

05/22/2024





The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service
Affidavit Form
(Version 1.07)

In the Matter of the Application of

Just Energy Solutions Inc.

for a Certificate or Renewal Certificate to Provide
Competitive Retail Natural Gas Service in Ohio.

Case No.

02

1828

-GA-CRS

County of

Harris

State of

Texas

Sean Holland

[Affiant], being duly sworn/affirmed, hereby states that:

- (1) The information provided within the certification or certification renewal application and supporting information is complete, true, and accurate to the best knowledge of affiant.
- (2) The applicant will timely file an annual report of its intrastate gross receipts and sales of hundred cubic feet of natural gas pursuant to Sections 4905.10(A), 4911.18(A), and 4929.23(B), Ohio Revised Code.
- (3) The applicant will timely pay any assessment made pursuant to Section 4905.10 or Section 4911.18(A), Ohio Revised Code.
- (4) Applicant will comply with all applicable rules and orders adopted by the Public Utilities Commission of Ohio pursuant to Title 49, Ohio Revised Code.
- (5) Applicant will cooperate with the Public Utilities Commission of Ohio and its staff in the investigation of any consumer complaint regarding any service offered or provided by the applicant.
- (6) Applicant will comply with Section 4929.21, Ohio Revised Code, regarding consent to the jurisdiction of the Ohio courts and the service of process.
- (7) Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the certification or certification renewal application within 30 days of such material change, including any change in contact person for regulatory or emergency purposes or contact person for Staff use in investigating customer complaints.
- (8) Affiant further sayeth naught.

Affiant Signature & Title

Sean A. Holland VP, Operations

Sworn and subscribed before me this

10th

day of

December

Month

2020

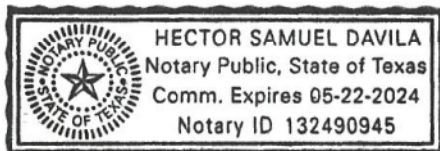
Year

[Signature]

Signature of Official Administering Oath

Hector Davila, Regulatory Affairs Specialist

Print Name and Title



My commission expires on

05-22-2024



(CRNGS Supplier Renewal) - Version 1.08

Page 8 of 8

Exhibit A-14 “Principal Officers, Directors and Partners”

Directors	Name of Officer	Position
R. Scott Gahn	R. Scott Gahn	President and Chief Executive Officer
Michael Carter	Michael Carter	Chief Financial Officer
James Brown	James Brown	Chief Commercial Officer
	Scott Fordham	Chief Operating Officer
	Jonah Davids	EVP, General Counsel and Corporate Secretary
	Sam Mavalwalla	Chief Information Officer
	Amir Andani	Chief Risk Officer
	Margaret Munnelly	SVP, Human Resources
	John Marcinko	EVP, Supply and Load Forecasting
	Sean Holland	VP, Operations
	William Graham	VP, Direct Channel Sales (Commercial)
	Karra Marino	VP, Affinity Brands and Alternate Channels
	Nicholas Jessen	VP, Sales Operations

Exhibit A-15 “Company History”

The applicant’s parent company, Just Energy Group Inc., is a leading independent Canadian electricity and natural gas marketing company, operating through wholly owned subsidiaries in Canada and U.S. The applicant is licensed by the Federal Energy Regulatory Commission and by the state regulatory agencies in states as an unregulated retail marketer of natural gas and electricity to homeowners, commercial and industrial consumers. Please see the attached Exhibit B-1

For over twenty years, the applicant has been delivering to its customers competitively priced and innovative energy products and personalized customer care in addition to quality gas and electric services. It continues to focus on superior customer service and providing customers with product choices that allow them to buy energy in ways that fit their business or personal budget requirements.

Exhibit A-16 “Articles of Incorporation and Bylaws”

Not Applicable. Information previously submitted has not changed.

Exhibit A-17 “Secretary of State”

Just Energy Solutions Inc. is currently registered with the Secretary of State. Certificate attached.

UNITED STATES OF AMERICA
STATE OF OHIO
OFFICE OF THE SECRETARY OF STATE

I, Frank LaRose, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show JUST ENERGY SOLUTIONS INC., a California corporation, having qualified to do business within the State of Ohio on November 27, 2000 under License No. 1195068 is currently in GOOD STANDING upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 22nd day of December, A.D.
2020.*

A handwritten signature in blue ink, appearing to read "Frank LaRose".

Ohio Secretary of State

Validation Number: 202035702674

Exhibit B-1 “Jurisdictions of Operation”

Affiliate	Province/State	License Type	License Order/Docket #
Hudson Energy Canada Corp.	Alberta	Electric	331458
Hudson Energy Canada Corp.	Alberta	Gas	331459
Just Energy Alberta L.P.	Alberta	Gas	325637
Just Energy Alberta L.P.	Alberta	Electricity	325638
Just Energy Alberta L.P.	Alberta	Direct Seller	345191
Just Energy (B.C.) Limited Partnership	British Columbia	Gas	A-7-18
Just Energy Solutions Inc.	California	Electric	1092
Just Energy Solutions Inc.	California	Gas	CTA0010
Hudson Energy Services, LLC	Connecticut	Gas	12-04
Just Energy Solutions Inc.	Delaware	Electric	Order No. 7330
Just Energy Solutions Inc.	Georgia	Gas	GM-30
Interactive Energy Group LLC	Illinois	Electric (Broker)	Docket 17-0390
Just Energy Illinois Corp.	Illinois	Gas	Docket 03-0720
Just Energy Solutions Inc.	Illinois	Electric	Docket 06-0723
Just Energy Solutions Inc.	Illinois	Gas	Docket 07-0501
Hudson Energy Services, LLC	Illinois	Electric	Docket 07-0455
Just Energy Indiana Corp.	Indiana	Gas	No license requirement
Interactive Energy Group LLC	Maine	Electricity	Docket 2017-00298
Just Energy Manitoba L.P.	Manitoba	Gas	644
Just Energy Solutions Inc.	Maryland	Electric	IR-639
Just Energy Solutions Inc.	Maryland	Gas	IR-737
Hudson Energy Services, LLC	Maryland	Electric /Broker	IR-1114
Hudson Energy Services, LLC	Maryland	Gas	IR-1120
Interactive Energy Group LLC	Maryland	Electricity	IR-3982
Interactive Energy Group LLC	Maryland	Gas	IR-3980
Interactive Energy Group LLC	Massachusetts	Electric	EB-433

**Just Energy Solutions Inc.- RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS – CASE
NUMBER 02-1828-GA-CRS**

Affiliate	Province/State	License Type	License Order/Docket #
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	GE17101075L
Just Energy New York Corp.	New York	Electricity	Approved ESCO
Just Energy New York Corp.	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	Approved Broker Certificate 17-624G(1)
Interactive Energy Group LLC	Ohio	Electric	Approved Broker Certificate 17-1266E(1)
Just Energy Solutions Inc.	Ohio	Electric	Certificate 01-1123-EL-CRS
Just Energy Solutions Inc.	Ohio	Gas	Certificate 02-023G (7)
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	Electricity	ER-2016-0332
Universal Energy Corporation	Ontario	Gas	GM-2016-0261

**Just Energy Solutions Inc.- RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS – CASE
NUMBER 02-1828-GA-CRS**

Affiliate	Province/State	License Type	License Order/Docket #
Just Energy Ontario L.P.	Ontario	Gas	GM-2015-0119
Just Energy Ontario L.P.	Ontario	Electricity	ER-2015-0118
Hudson Energy Canada Corp.	Ontario	Electricity	ER-2015-0125
Hudson Energy Canada Corp.	Ontario	Gas	GM-2015-0124
Just Energy New York Corp.	Ontario	Electric Wholesaler	EW-2014-0229
Just Energy Solutions Inc.	Ontario	Electric Wholesaler	EW-2016-0149
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	Electricity	FERC - ER10-379
Just Energy Solutions Inc.	US Federal	Electricity	FERC - ER97-4253
Just Energy New York Corp.	US Federal	Electricity	FERC - ER13-1081-000

**Just Energy Solutions Inc.- RENEWAL CERTIFICATION APPLICATION COMPETITIVE RETAIL NATURAL GAS – CASE
NUMBER 02-1828-GA-CRS**

Affiliate	Province/State	License Type	License Order/Docket #
Just Energy Illinois Corp.	US Federal	Electricity	FERC - ER13-1104-000
Just Energy Pennsylvania Corp.	US Federal	Electricity	FERC- ER17-2428-000
Just Energy Texas L.P.	US Federal	Electricity	FERC-ER17-2429-000
Hudson Energy Services, LLC	US Federal	Electricity	FERC-ER17-2427-000

Exhibit B-2 “Experience & Plans”

Our Experience

The applicant has over twenty years of experience offering competitively priced gas and electric service. In that time, it has provided varied offerings to residential and commercial customers. In addition, it has the ability to invoice its own customers and provide direct customer contact through its in-house customer service department. In many states, the applicant acts as the direct contact with the customer for switching service providers, customer complaints, billing, and other services. The applicant has been providing gas service to customers in Ohio since 2005.

Our Customers

The applicant generally markets to small commercial customers and residential customers. We market through several sales channels including telemarketing, door to door, mail and internet sales methods. We have internal customer service departments that are located in several North American locations, including Toronto and Texas. Products offered to customers can range from standard fixed offerings, to flat monthly rates to variable rate offerings, which are tailored to meet the customer's specific needs. The products normally have terms of five years or less. Just Energy's internal legal department reviews and approves all customer contracts.

Our Plans & Services

In Ohio, the applicant wishes to continue to grow its book of customers and serve both natural gas and electricity customers in all utility service territories. The applicant utilizes utility consolidated billing in a bill ready format, when available, and rate ready in other situations. Customer account management and billing will be performed through an internally developed IT system. 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

The applicant has an internal Customer Service Department that handles all incoming calls from our customers. They answer telephone calls Monday through Friday. Most calls received are recorded digitally to ensure the accuracy of our records and calls are also monitored and reviewed by our internal Quality Assurance department. If a Customer Service representative is unable to resolve a customer issue, the issue is escalated to our Compliance Department. The Compliance Department is a team of Corporate & Consumer Relations (“CCR”) specialists dedicated to responding to concerns or inquiries made by consumers in Ohio. They are responsible for resolving all issues brought to their attention by Customer Service or any informal or formal complaint filed through regulatory bodies, utilities and other third-party groups. The Compliance Department is also committed to:

- Regularly reviewing complaint activity in order to identify trends and problem areas;
- Ensure that compliance continues to remain as a compulsory component of contractor sales and orientation process;
- Continue to ensure that contractor marketing activity is conducted in accordance with company guidelines and regulatory rules; and
- Review marketing and training materials on a regular basis.

Our People

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 “Summary of Experience”

The applicant is a retail marketer of natural gas and electricity licensed in several states. In Ohio, the applicant serves in both the competitive gas and electricity markets. It has been a competitive retail energy supplier since 1997 when it was originally founded as Commonwealth Energy Corporation.

In Ohio the applicant serves gas customers with competitive retail natural gas service in the Columbia of Ohio (COH), Dominion East Ohio (DEO), Duke Energy of Ohio (Duke), and Vectren Energy Delivery of Ohio (VEDO) service areas. In the COH service area, the applicant serves over 31,000 customers. In the DEO service area, it serves over 24,000 customers. In the Duke service area, the applicant serves over 5,000 customers. In the VEDO service area, the applicant currently serves 6,000 customers. The applicant focuses on residential and small commercial customers in each service area. The applicant also serves Ohio power customers in American Electric Power (AEP), Duke Power, Dayton Power and Light, and the First Energy service territories. The applicant currently has 10,000 active customers in AEP, 7,000 customers in Duke, 3,000 customers in Dayton, and 18,000 active customers in the First Energy utilities.

The applicant provides consolidated billing in a rate ready format through each natural gas utility (except in Columbia gas where the bill ready format is also provided) and the bill ready format through each electric utility.

Exhibit B-4 “Disclosure of Liabilities and Investigations”

Just Energy Solutions Inc. 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.

Issues involving Just Energy Solutions Inc. (Applicant):

1. 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 into a joint stipulation resolving all matters identified by staff in a November Notice of Probable Non-Compliance. On November 2nd 2016, the Commission accepted the stipulation.
2. Case No. 1:12-CV-00758: Davina Hurt, et al. v. Commerce Energy, Inc. et al.; in the United States District Court for the Northern District of Ohio, Eastern Division.
Certified class action filed by former sales representatives claiming violations of federal and state minimum wage and overtime statutes for failure to pay. Trial on liability took place from September 29 to October 6, 2014. Jury found defendants failed to satisfy burden of demonstrating that plaintiffs qualified as outside salespeople. Trial on damages was held in May 2018 with class member payments ordered of approximately \$1.9 million. On September 28, 2018, Court issued a final order awarding attorney’s fees to Plaintiffs of approximately \$2.7 million and \$200,000 in costs and awarding class representative incentive awards. Appeal is pending on liability issue.

Issues involving U.S. affiliates of Just Energy Solutions Inc.:

1. Just Energy Texas LP (“Just Energy”) - Public Utility Commission of Texas (“PUCT”)
On May 16, 2014, the PUCT approved a settlement between Just Energy and PUCT staff. Prior the settlement, PUCT staff alleged several areas of non-compliance with enrollment and verification processes, complaint handling, customer switching, billing and disconnection. The allegations were based on a complaint-based audit of approximately 25 informal complaints that were partially a result of a major transition to a new billing system platform for all Just Energy customers in Texas. In the settlement, Just Energy agreed to pay an administrative penalty of \$164,000.
2. Just Energy Massachusetts Corp. – Assurance of Discontinuance with Massachusetts Attorney General
On December 31, 2014, Just Energy Massachusetts Corp. and certain related affiliates (collectively “Just Energy”) entered into an Assurance of Discontinuance with the Massachusetts Attorney General. Allegations included: failing to disclose complete and accurate pricing information to its customers, promising savings, inducing elderly and non-native English-speaking consumers to enter a contract, slamming, and charging high termination fees to small business owners. Just Energy is required to pay a total of \$4 million, including \$3.8 million to an independent trust fund for purposes of making restitution to the Commonwealth of Massachusetts. Just Energy also agreed to waive all early termination fees for all residential customers on variable rate contracts,

except those that are on introductory rates at the time of early termination. Just Energy is required to no longer make false representations in its marketing materials claiming that consumers will save money on electricity bills as a result of switching to its services. Just Energy has also agreed not to enroll low-income customers unless it guarantees savings to those customers and will engage an independent monitor to ensure compliance and appropriate door-to-door sales operations in Massachusetts. The Assurance of Discontinuance expired December 31, 2017.

3. Just Energy – RPS requirement fees paid in California 2017 – 2020

RPS Deficit

For RPS Compliance Period 1 each retail seller was required to retire an amount of renewable energy credits (RECs) that averaged at least 20% of its retail sales in 2011-2013. Each retail seller was also required to submit an RPS compliance report demonstrating its compliance with the RPS program requirement after the Compliance Period was completed. The program does not allow for true-up of shortages after each respective compliance period. Just Energy timely submitted its Compliance Report and supporting materials to the Commission, which, after some time and adjustments determined there was a procurement quantity requirement deficit of 25,334 RECs which equated to a RPS penalty of \$1,266,680.00 that Just Energy chose to pay in 2017.

Resource Adequacy – Capacity Procurement Issues

Capacity available through California's Resource Adequacy (RA) program is scarce. As a result, there are times when Just Energy is unable to purchase all of the RA (aka – capacity) needed to meet compliance and instead, Just Energy incur penalties for small 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 or a flat fee basis. Just Energy seeks waivers for fines, where applicable and possible as fines are expected. From a reliability standpoint, no shortage was ever experienced, as there is a CAISO backstop capacity mechanism in place to cover market shortages. For calendar year 2019, the total amount of fines was \$488,249.60. The total amount of fines paid in 2020 for compliance year 2020 and 2021 is \$137,648.90.

Issues Associated with Canadian Affiliates of Just Energy Solutions Inc.:

1. Just Energy Ontario L.P. ("Just Energy") - Ontario Energy Board, EB-2013-0392 | EB-2013-0393

In April 2014, Just Energy agreed to pay \$450,000 under an Assurance of Voluntary Compliance ("AVC") accepted by the Ontario Energy Board. During a review, it was discovered that there was a system calculating error that resulted in inaccuracies in approximately 1% of letters delivered to customers between January 2011 and October 2012 in Ontario. Just Energy voluntarily agreed to pay a penalty to the OEB for this inadvertent system error that occurred during a system upgrade. Customers directly affected have been contacted and reimbursed as necessary.

Exhibit C-1 “Annual Reports”

Below are links to access Just Energy’s two most recent Annual Reports filed with the Canadian Securities and Exchange Commission. Financial data is maintained on a consolidated company basis and therefore cannot be produced to reflect Just Energy Solutions Inc. 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 the applicant 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”

Just Energy Solutions Inc. has never filed and/or reported reorganizations, protection from creditors, or any other form of bankruptcy filings.

Exhibit C-9 “Merger Information”

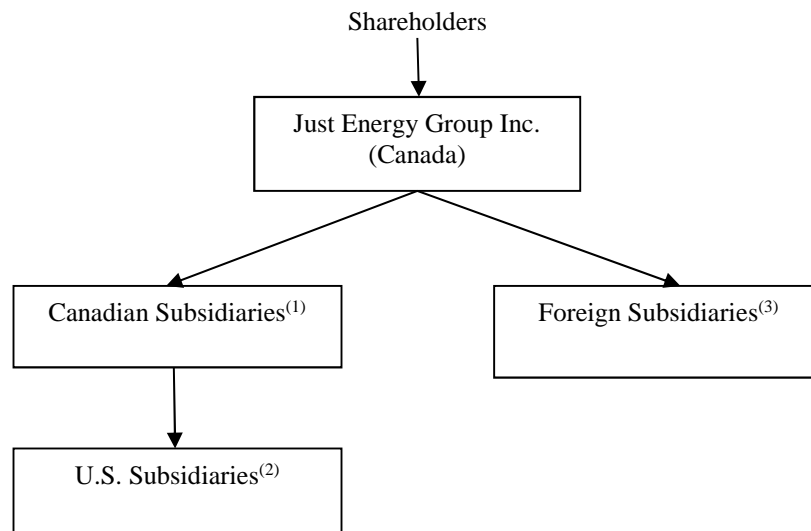
Parent company Just Energy Group Inc. acquired Filter Group in September 2018 for \$15 million in cash consideration, the assumption of approximately \$22 million of Filter Group debt, and future performance based earn-out payments. Headquartered in Toronto, Ontario, Filter Group currently provides under counter and whole home water filtration solutions to residential markets in the Provinces of Ontario and Manitoba and the States of Nevada, California, Arizona, Michigan and Illinois, with over 30,000 customers to date.

Exhibit C-10 “Corporate Structure”

DESCRIPTION OF THE CORPORATE STRUCTURE

Just Energy Ontario L.P. is a limited partnership and an indirect subsidiary of Just Energy Group Inc. (“Just Energy”) a corporation established under the laws of Canada. Just Energy is a publicly traded corporation (NYSE:JE and TSX: JE).

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. JEBPO Services LLP is an indirect wholly-owned subsidiary of the Company which provides services to the Company and its affiliates.

Exhibit D-1 “Operations”

The applicant is a third-party electricity and natural gas supplier that provides customer choice and competitive pricing of energy to retail customers. The operations department contracts bilaterally with other energy suppliers to serve our retail load and to fulfill other company requirements, such as filling storage facilities and balancing supply pools. The applicant utilizes these facilities and pools to fulfill delivery requirements to various local distribution companies and their city gates. Contract purchases range from daily spot structures to yearly supply acquisitions.

Exhibit D-2 “Operations Expertise”

The applicant’s operations department handles all nominations and scheduling of the purchases referenced in Exhibit D-1, retail load and other company requirements. The analysts monitor the individual markets and the marketplace closely. They are on call 24 hours a day to ensure that all necessary pipeline and utility requirements are met. The operations department is responsible for nominations, balancing, scheduling and purchasing requirements in-house for over 510,000 customers in several gas markets around the country.

Exhibit D-3 “Key Technical Personnel”

Scott Gahn

Chief Executive Officer and President

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.

Email: SGahn@justenergy.com

Address: Suite 1000 – 5251 Westheimer Road, Huston, Texas, U.S. 77056

Phone: 713.933.0895

James Brown

Chief Commercial Officer

Jim Brown was appointed as Chief Financial Officer in April 2018. He joined Just Energy’s group of companies in April 2013 as a Senior Vice President responsible for commodity settlements, and most recently served as the President of Hudson Energy, responsible for that entity’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. and before that the 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.

Email: jbrown@justenergy.com

Address: Suite 1000 – 5251 Westheimer Road, Huston, Texas, U.S. 77056

Phone: 713.544.8191

JONAH DAVIDS

Executive Vice President, General Counsel and Corporate Secretary

Jonah is currently the Executive Vice President, General Counsel and Corporate Secretary of Just Energy, 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.

Email: jdavids@justenergy.com

Address: Suite 400, 6345 Dixie Road, Mississauga, ON, L5T 2E6

Phone: 905-795-3563

MARK REESE

Vice President, U.S. Supply

Mark joined the company in July 2015. He is responsible for the overall management of the US natural gas portfolio for Just Energy, including financial hedging, gas supply, transportation, and storage optimization. Prior to joining Just Energy he was Director of Retail Gas Operations for Dominion Resources. Prior to that he held various roles, ranging from portfolio management, to project finance, and deal structuring at Enron. Mark began his career at Sonat Marketing and has over 19 years of experience in the energy industry. Mark earned a Bachelor of Arts degree in Finance from Morehouse College in Atlanta, GA and earned his Master's degree in Business Administration (MBA) from The Darden School at the University of Virginia.

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Michael Carter

Chief Financial Officer

Michael Carter was appointed Just Energy's Chief Financial Officer in September 2020. He come with broad industry experience including holding various key roles in finance, corporate planning and treasury, corporate development and operations with well known companies. Mr. Carter most recently served as Senior Vice President, Finance at Hunt Power & Hunt Utility Services, an affiliate of Hunt Consolidated, Inc. Prior to his time at Hunt, he held the positions of Senior Vice President, Corporate Planning and Assistant Treasurer and Senior Vice President, Corporate Development at Energy Future Holdings Corporation (the predecessor of the parent company of Vistra Corporation). He holds a Bachelor of Science, Accounting, from Louisiana State University in Shreveport.

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Phone: 713.933.0889

Scott Fordham

Chief Operating Officer

Scott Fordham joined Just Energy in early-2020 and assumed the role of Senior Vice President-Finance and Chief Accounting Officer. He was appointed to Chief Operating Officer in September 2020. Mr. Fordham has significant hands-on industry experience, including his leadership roles as President of Acclaim Energy, and Chief Executive Officer and President of Champion Energy Services. He has had considerable success in achieving organic sales growth, developing effective organizational structures, leading rebranding and implementing customer satisfaction initiatives. He holds a Bachelor of Business Administration in accounting from The University of Texas at Austin.

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