



DIS Case Number: 17-1991-EL-AGG

## Section A: Application Information

### A-1. Provider type:

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

### A-2. Applicant's legal name and contact information.

**Legal Name:** Interactive Energy Group LLC

**Country:** United States

**Phone:** 8005353983    **Extension (if applicable):**

**Street:** 2901 West Parker Rd #864524

**Website (if any):**  
www.InteractiveEnergyGroup.com

**City:** Plano

**Province/State:** TX

**Postal Code:** 75086

### A-3. Names and contact information under which the applicant will do business in Ohio

Provide the names and contact information the business entity will use for business in Ohio. This does not have to be an Ohio address and may be the same contact information given in A-2.

Name	Type	Address	Active?	Proof
Interactive Energy Group LLC	Official Name	2901 West Parker Rd #864524 Plano, TX 75086	Yes	File

### A-4. Names under which the applicant does business in North America

Provide all business names the applicant uses in North America, including the names provided in A-2 and A-3.

Name	Type	Address	Active?	Proof
------	------	---------	---------	-------

### A-5. Contact person for regulatory matters



## Public Utilities Commission

Inger Goodman  
5251 Westheimer Road Suite 1000  
Houston, TX 77056  
US  
igoodman@justenergy.com  
7144251063

### A-6. Contact person for PUCO Staff use in investigating consumer complaints

Karla Paez  
5251 Westheimer Road, Suite 1000  
Houston, TX 77056  
US  
kpaez@justenergy.com  
7138506790

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

<b>Phone:</b> 8005353983	<b>Extension (if applicable):</b>	<b>Country:</b> United States
<b>Fax:</b>	<b>Extension (if applicable):</b>	<b>Street:</b> 2901 West Parker Rd #864524
<b>Email:</b> support@interactiveenergygroup.com		<b>City:</b> Plano <b>Province/State:</b> TX <b>Postal Code:</b> 75086

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

20-4348258

### A-9. Applicant's form of ownership

**Form of ownership:** Limited Liability Partnership (LLP)

### A-10. Identify current or proposed service areas

Identify each service area in which the applicant is currently providing service or intends to provide service and identify each customer class that the applicant is currently serving or intends to serve.

#### Service area selection

AEP Ohio

DP&L

Duke Energy Ohio

FirstEnergy - Cleveland Electric Illuminating

FirstEnergy - Ohio Edison

FirstEnergy - Toledo Edison

### **Class of customer selection**

Commercial

Industrial

Mercantile

Residential

### **A-11. Start date**

Indicate the approximate start date the applicant began/will begin offering services: 09-15-2021

### **A-12. Principal officers, directors, and partners**

Please provide all contacts that should be listed as an officer, director or partner.

Name	Email	Title	Address
R Scott Gahn		President and Chief Executive Officer	5251 Westheimer Road, Suite 1000 Houston, TX 77056 US
Michael Carter		Chief Financial Officer	5251 Westheimer Road, Suite 1000 Houston, TX 77056 US
James Brown		Chief Commercial Officer	5251 Westheimer Road, Suite 1000 Houston, TX 77056 US
Scott Fordham		Chief Operating Officer	5251 Westheimer Road, Suite 1000 Houston, TX 77056 US
Jonah Davids		EVP, General Counsel & Corporate Secretary	100 King St. W, Suite 2630 Toronto, ON M5X 1E1 CA

### **A-13. Company history**

Interactive Energy Group LLC (IEG) was established in 2005 and incorporated as IEG in September

2017. It is a certified energy broker that currently manages a portfolio consisting of thousands of commercial customers across the U.S. IEG functions as a one-stop energy management firm and is recognized as a market leader in electricity and natural gas procurement sales, risk management, planning, utility expense auditing and other cost saving initiatives in the competitive commercial and industrial energy segments. The company's main office is in Plano, Texas. Currently, all employees of IEG are internal and all functions are managed in house. Just Energy Group Inc. ('Just Energy Group') acquired IEG in August of 2017. However, IEG operates as an independent broker. Please see enclosed Exhibit B-1 for a list of other Commission issued licenses and affiliated companies existing under the Just Energy Group umbrella.

#### **A-14. Secretary of State**

Secretary of State Link:

## **Section B: Applicant Managerial Capability and Experience**

#### **B-1. Jurisdiction of operations**

List all jurisdictions in which the applicant or any affiliated interest of the applicant is certified, licensed, registered or otherwise authorized to provide retail natural gas service or retail/wholesale electric service as of the date of filing the application..

File Attached

#### **B-2. Experience and plans**

Describe the applicant's experience in providing the service(s) for which it is applying (e.g., number and type of customers served, utility service areas, amount of load, etc.). Include the 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 Sections 4928.10 and/or 4929.22 of the Ohio Revised Code.

File(s) attached



**B-3. Disclosure of liabilities and investigations**

For the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant, describe all existing, pending or past rulings, judgments, findings, contingent liabilities, revocation of authority, regulatory investigations, judicial actions, or other formal or informal notices of violations, or any other matter related to competitive services in Ohio or equivalent services in another jurisdiction..

File Attached

**B-4. Disclosure of consumer protection violations**

Has the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years?

**No**

**B-5. Disclosure of certification, denial, curtailment, suspension or revocation**

Has the applicant, affiliate, or a predecessor of the applicant had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, revoked, or cancelled or been terminated or suspended from any of Ohio's Natural Gas or Electric Utility's Choice programs within the past two years?

**No**

## **Section C: Applicant Financial Capability and Experience**

**C-1. Financial reporting**

Provide a current link to the most recent Form 10-K filed with the Securities and Exchange Commission (SEC) or upload the form. If the applicant does not have a Form 10-K, submit the parent company's Form 10-K. If neither the applicant nor its parent is required to file Form 10-



## Public Utilities Commission

K, state that the applicant is not required to make such filings with the SEC and provide an explanation as to why it is not required.

Financial Reports Link(s): 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/>

### C-2. Financial statements

Provide copies of the applicant's two most recent years of audited financial statements, including a 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, provide 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 bank account numbers redacted**.

If the applicant is unable to meet the requirement for two years of financial statements, the Staff reviewer may request additional financial information.

Links to Financial Statement(s): 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/>

### C-3. Forecasted financial statements

Provide two years of forecasted income statements **based solely on the applicant's anticipated business activities in the state of Ohio**.

Include the following information with the forecast: a list of assumptions used to generate the forecast; a statement indicating that the forecast is based solely on Ohio business activities only; and the name, address, email address, and telephone number of the preparer of the forecast.



The forecast may be in one of two acceptable formats: 1) an annual format that includes the current year and the two years succeeding the current year; or 2) a monthly format showing 24 consecutive months following the month of filing this application broken down into two 12-month periods with totals for revenues, expenses, and projected net incomes for both periods. Please show revenues, expenses, and net income (revenues minus total expenses) that is expected to be earned and incurred in **business activities only in the state of Ohio** for those periods.

If the applicant is filing for both an electric certificate and a natural gas certificate, please provide a separate and distinct forecast for revenues and expenses representing Ohio electric business activities in the application for the electric certificate and another forecast representing Ohio natural gas business activities in the application for the natural gas certificate.

Preferred to file confidentially

#### **C-4. Credit rating**

Provide a credit opinion disclosing the applicant's credit rating as reported by at least one of the following ratings agencies: Moody's Investors Service, Standard & Poor's Financial Services, Fitch Ratings or the National Association of Insurance Commissioners. If the applicant does not have its own credit ratings, substitute the credit ratings of a parent or an affiliate organization and submit 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 'Not Rated'.

This does not apply

#### **C-5. Credit report**

Provide a copy of the applicant's credit report from Experian, Equifax, TransUnion, Dun and Bradstreet or a similar credit reporting organization. If the applicant is a newly formed entity with no credit report, then provide a personal credit report for the principal owner of the entity seeking certification. At a minimum, the credit report must show summary information and an overall credit score. **Bank/credit account numbers and highly sensitive identification information must be redacted.** If the applicant provides an acceptable credit rating(s) in response to C-4, then the applicant may select 'This does not apply' and provide a response in the box below stating that a credit rating(s) was provided in response to C-4.

Preferred to file this information confidentially



**C-6. Bankruptcy information**

Within the previous 24 months, have any of the following filed for reorganization, protection from creditors or any other form of bankruptcy?

- Applicant
- Parent company of the applicant
- Affiliate company that guarantees the financial obligations of the applicant
- Any owner or officer of the applicant

Please provide full details of the bankruptcy information.





## Public Utilities Commission

Bankruptcy Information: On March 11, 2021, Just Energy provided that due to the unprecedented storm that hit Texas in February 2021, significant charges from the Electric Reliability Council of Texas, Inc. created a liquidity challenge for Just Energy. As a result, the Company sought and received protection under the Companies' Creditors Arrangement Act (CCAA). On March 24, 2021, the Public Utilities Commission of Ohio (the Commission) issued an Entry in the captioned proceedings and ordered Just Energy Solutions Inc., Hudson Energy Services LLC, and Interactive Energy Group LLC (collectively, the Just Energy Companies) to file a report addressing related questions. An initial response was provided on April 9, 2021 and Just Energy will continue to report on the status of this issue on a regular basis as requested.

### **C-7. Merger information**

Is the applicant currently involved in any dissolution, merger or acquisition activity, or otherwise participated in such activities within the previous 24 months?

No

### **C-8. Corporate structure**

Provide a graphical depiction of the applicant's corporate structure. Do not provide an internal organizational chart. The graphical depiction should include all parent holding companies, subsidiaries and affiliates as well as 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 the applicant may respond by stating that it is a stand-alone entity with no affiliate or subsidiary companies.

File(s) attached

## **Section D: Applicant Technical Capacity**

### **D-1. Operations**

Power brokers/aggregators: Include details of the applicant's business operations and plans for arranging and/or aggregating for the supply of electricity to retail customers.



## Public Utilities Commission

Operations Description: Interactive Energy is a commercial brokerage that provides customers customized energy solutions based on their needs to mitigate risk. The customer contracts directly with a Supplier to serve their electricity and gas needs and receives a bill directly from the Supplier. The types of contracts vary and must be supported by the Supplier.

IEG facilitates the introduction of customers to the Supplier and will engage on behalf of the customer should any issues arise, when applicable. The retailer will provide a brokerage fee to IEG as long as the customer remains a customer of Supplier. Currently, all employees of IEG are internal and all functions are managed in house.

### **D-2. Operations Expertise & Key Technical Personnel**

Given the operational nature of the applicant's business, provide evidence of the applicant's experience and technical expertise in performing such operations. Include the names, titles, e-mail addresses, and background of key personnel involved in the operations of the applicant's business.

Operations Expertise & Personnel Description: We have a combined 50+ years of retail and brokerage experience on the team. This combined knowledge allows us to tailor Supplier offerings to meet the needs of our customers. Our team monitors current industry trends, market analytics and customer analytics to determine how to serve our customers in the best way possible.

#### Key Technical Personnel

Tracy Hodge

General Manager, Interactive Energy Group LLC

Tracy Hodge serves as the General Manager of Interactive Energy Group. She has over 16 years of retail energy experience and joined as employee number 4 of the commercial brokerage in 2005. She was also the Director of Product Operations at Ambit Energy for 5 years where she worked on strategy, marketing, project management, operations, analytics, customer experience improvements, and development initiatives.

Email: [thodge@interactiveenergygroup.com](mailto:thodge@interactiveenergygroup.com)

Address: 2901 West Parker Road, #864524, Plano, TX 75086

Phone: 972-373-1684 ext 69004

Courtney Love

Sr. Finance and Operations Analyst



## Public Utilities Commission

Courtney Love is the Sr. Finance and Operations Analyst of Interactive Energy Group. She has over 3 years of deregulated energy experience. She leads all customer service initiatives, commissions, customer analytics, pricing, financial reporting and supporting supplier relationships.

Email: [clove@interactiveenergygroup.com](mailto:clove@interactiveenergygroup.com)

Address: 2901 West Parker Road, #864524, Plano, TX 75086

Phone: 972-373-1687 ext 69006



Public Utilities  
Commission

# Application Attachments

## **Exhibit B-2 "Experience & Plans"**

### **Experience**

We have a combined 50+ years of retail and brokerage experience on the team. This combined knowledge allows us to tailor Supplier offerings to meet the needs of our customers. Our team monitors current industry trends, market analytics and customer analytics to determine how to serve our customers in the best way possible.

IEG has customers in multiple states in the US, but the customer base is primarily located in Texas. IEG seeks to expand its geographical and product offerings to its customers. IEG has primarily focused on power but intends to expand into natural gas where applicable.

### **Customers**

IEG typically targets small commercial and C&I customers. Based on the customer's needs, we then provide Supplier options to the customer and they enter into power and/or gas contracts with a Supplier. Supplier products offered to customers can range from standard fixed offerings to "one off" offerings, which are tailored to meet the customer's specific needs. These products can either be fixed or floating rate or a blend of the two, and normally have terms of less than five years. The customer contracts directly with a Supplier to serve their electricity and gas needs and receives a bill directly from the Supplier. The types of contracts vary and must be supported by the Supplier.

### **Plans and Services**

IEG plans to broker electricity and gas services in Ohio for all utilities. All customer billing, TPV, etc. will be completed by the Supplier.

### **Complaint Handling**

We require 2 years minimum experience in retail energy to be hired as one of our commercial energy advisors, either from another retail energy provider or a reputable aggregator, consultant, or brokerage. Each new Commercial Energy Advisor will spend their first week in the office learning the strategic processes of the IEG Sales and Operations Team. New hires will be taught how to request usage, build an RFP and submit a completed energy contract. Each Commercial Energy Advisor will also be trained on all of the applicable municipal, state and federal regulations and laws. Following, each new hire will spend two weeks shadowing a Senior Energy Advisor both in the office and out in the field. They will observe how a senior level salesperson manages their day. They will learn prospecting, how to work up a proposal, deliver a presentation to the client, and close the deal within the terms and conditions of the energy retailer the customer chooses.

The Applicants brokers will manage a direct business relationship with customers and will proactively check in with customer to ensure they are satisfied with the level of service they are receiving. Customers will have direct access to the Applicants brokers for inquires/requests and to report dissatisfaction. Customers will be encouraged to work with the applicable retailer to resolve billing and service related inquires/requests. As a last resort, Applicants brokers will guide customers to follow the applicable external dispute resolution process as required (i.e., Public Utilities Commission).

### **Key Personnel**

We have a combined 50+ years of retail and brokerage experience on the team. Key personnel are below:

**Scott Fordham** joined Just Energy in early-2020 and assumed the role of Senior Vice President-Finance and Chief Accounting Officer. 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.

**Tracy Hodge** serves as the General Manager of Interactive Energy Group. She has over 16 years of retail energy experience and joined as employee number 4 of the commercial brokerage in 2005. She was also the Director of Product Operations at Ambit Energy for 5 years where she worked on strategy, marketing, project management, operations, analytics, customer experience improvements, and development initiatives.

**Courtney Love** is the Sr. Finance and Operations Analyst of Interactive Energy Group. She has over 3 years of deregulated energy experience. She leads all customer service initiatives, commissions, customer analytics, pricing, financial reporting and supporting supplier relationships.

**Exhibit B-1 “Jurisdictions of Operation”**

<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>
<b>Hudson Energy Canada Corp.</b>	<b>Alberta</b>	<b>Electric</b>	<b>331458</b>
<b>Hudson Energy Canada Corp.</b>	<b>Alberta</b>	<b>Gas</b>	<b>331459</b>
<b>Just Energy Alberta L.P.</b>	<b>Alberta</b>	<b>Gas</b>	<b>325637</b>
<b>Just Energy Alberta L.P.</b>	<b>Alberta</b>	<b>Electric</b>	<b>325638</b>
<b>Just Energy Alberta L.P.</b>	<b>Alberta</b>	<b>Direct Seller</b>	<b>345191</b>
<b>Just Energy (B.C.) Limited Partnership</b>	<b>British Columbia</b>	<b>Gas</b>	<b>A-8-20</b>
<b>Just Energy Solutions Inc.</b>	<b>California</b>	<b>Electric</b>	<b>1092</b>
<b>Just Energy Solutions Inc.</b>	<b>California</b>	<b>Gas</b>	<b>CTA0010</b>
<b>Hudson Energy Services, LLC</b>	<b>Connecticut</b>	<b>Gas</b>	<b>12-04</b>
<b>Just Energy Solutions Inc.</b>	<b>Delaware</b>	<b>Electric</b>	<b>Order No. 7330</b>
<b>Just Energy Solutions Inc.</b>	<b>Georgia</b>	<b>Gas</b>	<b>GM-30</b>
<b>Interactive Energy Group LLC</b>	<b>Illinois</b>	<b>Electric (Broker)</b>	<b>Docket 17-0390</b>
<b>Just Energy Illinois Corp.</b>	<b>Illinois</b>	<b>Gas</b>	<b>Docket 03-0720</b>
<b>Just Energy Solutions Inc.</b>	<b>Illinois</b>	<b>Electric</b>	<b>Docket 06-0723</b>
<b>Just Energy Solutions Inc.</b>	<b>Illinois</b>	<b>Gas</b>	<b>Docket 07-0501</b>
<b>Hudson Energy Services, LLC</b>	<b>Illinois</b>	<b>Electric</b>	<b>Docket 07-0455</b>
<b>Interactive Energy Group LLC</b>	<b>Maine</b>	<b>Electric (Broker)</b>	<b>Docket 2017-00298</b>
<b>Just Energy Manitoba L.P.</b>	<b>Manitoba</b>	<b>Gas</b>	<b>659</b>

<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>
<b>Just Energy Solutions Inc.</b>	<b>Maryland</b>	<b>Electric</b>	<b>IR-639</b>
<b>Just Energy Solutions Inc.</b>	<b>Maryland</b>	<b>Gas</b>	<b>IR-737</b>
<b>Hudson Energy Services, LLC</b>	<b>Maryland</b>	<b>Electric</b>	<b>IR-1114</b>
<b>Hudson Energy Services, LLC</b>	<b>Maryland</b>	<b>Gas</b>	<b>IR-1120</b>
<b>Interactive Energy Group LLC</b>	<b>Maryland</b>	<b>Electric (Broker)</b>	<b>IR-3982</b>
<b>Interactive Energy Group LLC</b>	<b>Maryland</b>	<b>Gas (Broker)</b>	<b>IR-3980</b>
<b>Interactive Energy Group LLC</b>	<b>Massachusetts</b>	<b>Electric (Broker)</b>	<b>EB-433</b>
<b>Interactive Energy Group LLC</b>	<b>Massachusetts</b>	<b>Gas (Broker)</b>	<b>RA-200</b>
<b>Just Energy Massachusetts Corp.</b>	<b>Massachusetts</b>	<b>Electric</b>	<b>CS-069</b>
<b>Hudson Energy Services, LLC</b>	<b>Massachusetts</b>	<b>Electric</b>	<b>CS-061</b>
<b>Hudson Energy Services, LLC</b>	<b>Massachusetts</b>	<b>Gas</b>	<b>GS-034</b>
<b>Just Energy Solutions Inc.</b>	<b>Michigan</b>	<b>Electric</b>	<b>U-13203</b>
<b>Just Energy Michigan Corp.</b>	<b>Michigan</b>	<b>Gas</b>	<b>U-15980</b>
<b>Just Energy Solutions Inc.</b>	<b>Nevada</b>	<b>Gas</b>	<b>G-13 Sub 1</b>
<b>Just Energy Solutions Inc.</b>	<b>New Jersey</b>	<b>Gas</b>	<b>GSL-0116</b>
<b>Just Energy Solutions Inc.</b>	<b>New Jersey</b>	<b>Electric</b>	<b>ESL-0046</b>
<b>Hudson Energy Services, LLC</b>	<b>New Jersey</b>	<b>Gas</b>	<b>GSL- 0069</b>
<b>Hudson Energy Services, LLC</b>	<b>New Jersey</b>	<b>Electric</b>	<b>ESL - 0083</b>
<b>Interactive Energy Group LLC</b>	<b>New Jersey</b>	<b>Energy Agent</b>	<b>EA-0484</b>



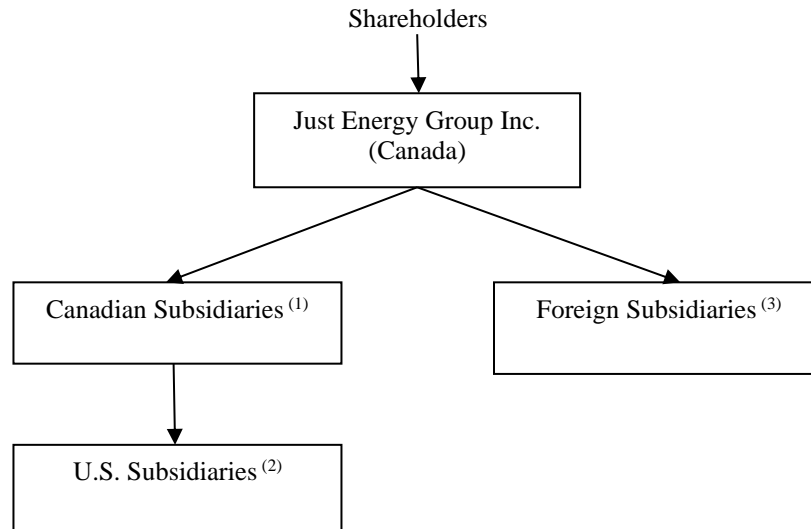
<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>
<b>Just Energy New York Corp.</b>	<b>New York</b>	<b>Electric</b>	<b>Approved ESCO</b>
<b>Just Energy New York Corp.</b>	<b>New York</b>	<b>Gas</b>	<b>Approved ESCO</b>
<b>Just Energy Solutions Inc.</b>	<b>New York</b>	<b>Electric</b>	<b>Approved ESCO</b>
<b>Just Energy Solutions Inc.</b>	<b>New York</b>	<b>Gas</b>	<b>Approved ESCO</b>
<b>Hudson Energy Services, LLC</b>	<b>New York</b>	<b>Gas</b>	<b>Approved ESCO</b>
<b>Hudson Energy Services, LLC</b>	<b>New York</b>	<b>Electric</b>	<b>Approved ESCO</b>
<b>Interactive Energy Group LLC</b>	<b>Ohio</b>	<b>Gas (Broker)</b>	<b>Certificate 17-624G (2)</b>
<b>Interactive Energy Group LLC</b>	<b>Ohio</b>	<b>Electric (Broker)</b>	<b>Certificate 17-1266E (2)</b>
<b>Just Energy Solutions Inc.</b>	<b>Ohio</b>	<b>Electric</b>	<b>Certificate 01-74E (10)</b>
<b>Just Energy Solutions Inc.</b>	<b>Ohio</b>	<b>Gas</b>	<b>Certificate 02-023G</b>
<b>Hudson Energy Services, LLC</b>	<b>Ohio</b>	<b>Gas</b>	<b>Certificate 12-271G</b>
<b>Hudson Energy Services, LLC</b>	<b>Ohio</b>	<b>Electric</b>	<b>Certificate 12-538 E</b>
<b>Universal Energy Corporation</b>	<b>Ontario</b>	<b>Electric</b>	<b>ER-2016-0332</b>
<b>Universal Energy Corporation</b>	<b>Ontario</b>	<b>Gas</b>	<b>GM-2016-0261</b>
<b>Just Energy Ontario L.P.</b>	<b>Ontario</b>	<b>Gas</b>	<b>GM-2020-0121</b>
<b>Just Energy Ontario L.P.</b>	<b>Ontario</b>	<b>Electric</b>	<b>ER-2020-0120</b>
<b>Hudson Energy Canada Corp.</b>	<b>Ontario</b>	<b>Electric</b>	<b>ER-2020-0117</b>
<b>Hudson Energy Canada Corp.</b>	<b>Ontario</b>	<b>Gas</b>	<b>GM-2020-0118</b>
<b>Just Energy New York Corp.</b>	<b>Ontario</b>	<b>Electric Wholesaler</b>	<b>EW-2019-0108</b>

<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>
<b>Just Energy Solutions Inc.</b>	<b>Ontario</b>	<b>Electric Wholesaler</b>	<b>EW-2016-0149</b>
<b>Just Energy Solutions Inc.</b>	<b>Pennsylvania</b>	<b>Electric (PECO)</b>	<b>A-110117</b>
<b>Just Energy Solutions Inc.</b>	<b>Pennsylvania</b>	<b>Gas (PECO)</b>	<b>A-125138</b>
<b>Just Energy Pennsylvania Corp.</b>	<b>Pennsylvania</b>	<b>Gas (Columbia)</b>	<b>A-2009-2098011</b>
<b>Just Energy Pennsylvania Corp.</b>	<b>Pennsylvania</b>	<b>Electric (Duquesne)</b>	<b>A-2009-2097544</b>
<b>Hudson Energy Services, LLC</b>	<b>Pennsylvania</b>	<b>Electric</b>	<b>A-2010-2192137</b>
<b>Hudson Energy Services, LLC</b>	<b>Pennsylvania</b>	<b>Gas</b>	<b>A-2018-3002121</b>
<b>Interactive Energy Group LLC</b>	<b>Pennsylvania</b>	<b>Gas (Broker)</b>	<b>A-2017-2634175</b>
<b>Interactive Energy Group LLC</b>	<b>Pennsylvania</b>	<b>Electric (Broker)</b>	<b>A-2017-2635016</b>
<b>Just Energy Quebec L.P /Juste Energie Quebec S.E.C</b>	<b>Quebec</b>	<b>Gas</b>	<b>No license requirement</b>
<b>Hudson Energy Canada Corp./Energie Hudson Canada</b>	<b>Quebec</b>	<b>Gas</b>	<b>No license requirement</b>
<b>Hudson Energy Canada Corp.</b>	<b>Saskatchewan</b>	<b>Gas</b>	<b>No license requirement</b>
<b>Just Energy Prairies L.P.</b>	<b>Saskatchewan</b>	<b>Direct Seller</b>	<b>Direct Sellers license # 328505</b>
<b>Fulcrum Retail Energy, LLC dba Amigo Energy</b>	<b>Texas</b>	<b>Electric</b>	<b>REP Certification No. 10081</b>
<b>Interactive Energy Group LLC</b>	<b>Texas</b>	<b>Broker</b>	<b>BR190398</b>
<b>Just Energy Texas L.P.</b>	<b>Texas</b>	<b>Electric</b>	<b>REP Certification No. 10052</b>
<b>Hudson Energy Services, LLC</b>	<b>Texas</b>	<b>Electric</b>	<b>REP Certification No. 10092 under Docket 30061</b>
<b>Tara Energy, LLC dba SPE</b>	<b>Texas</b>	<b>Electric</b>	<b>REP Certification No. 10051</b>
<b>Just Energy Solutions Inc.</b>	<b>Virginia</b>	<b>Gas</b>	<b>G-30</b>

<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>
<b>Just Energy Solutions Inc.</b>	<b>Virginia</b>	<b>Electric</b>	<b>E-26</b>
<b>Just Energy U.S. Corp</b>	<b>US Federal</b>	<b>Electric</b>	<b>FERC - ER10-379</b>
<b>Just Energy Solutions Inc.</b>	<b>US Federal</b>	<b>Electric</b>	<b>FERC - ER97-4253</b>
<b>Just Energy New York Corp.</b>	<b>US Federal</b>	<b>Electric</b>	<b>FERC - ER13-1081-000</b>
<b>Just Energy Illinois Corp.</b>	<b>US Federal</b>	<b>Electric</b>	<b>FERC - ER13-1104-000</b>
<b>Just Energy Pennsylvania Corp.</b>	<b>US Federal</b>	<b>Electric</b>	<b>FERC- ER17-2428-000</b>
<b>Just Energy Texas I Corp.</b>	<b>US Federal</b>	<b>Electric</b>	<b>FERC-ER17-2429-000</b>
<b>Hudson Energy Services, LLC</b>	<b>US Federal</b>	<b>Electric</b>	<b>FERC-ER17-2427-000</b>

## ORGANIZATIONAL STRUCTURE

Interactive Energy Group LLC is a Limited Liability Company and an indirect subsidiary of Just Energy Group Inc. (“Just Energy”) a corporation established under laws of Canada. Just Energy Group Inc. is a corporation established under the laws of Canada and is publicly traded on the OTC Pink Market under the ticker symbol **JENGQ**.



### 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; and Filter Group USA 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.n.

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 INTERACTIVE ENERGY GROUP LLC, a Delaware For Profit Limited Liability Company, Registration Number 4068998, filed on September 5, 2017, is currently in FULL FORCE AND EFFECT upon the records of this office.*



*Witness my hand and the seal of the  
Secretary of State at Columbus, Ohio  
this 26th day of August, A.D. 2021.*

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

**Ohio Secretary of State**

**Validation Number: 202123801144**

### **B-3 Disclosure of liabilities and investigations**

Interactive Energy Group 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 all existing, pending or past rulings, judgments, findings, contingent liabilities, revocation of authority, regulatory investigations, judicial actions, or other formal or informal notices of violations, or any other matter related to competitive services in Ohio or equivalent services in another jurisdiction for the applicant's parent company, 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.

#### **Ohio**

1. Case No. 16-2006-GE-UNC

In the Matter of Commerce Energy, Inc. d/b/a 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. Since then, Just Energy have not received any further communications regarding this issue from the Commission.

#### **Texas**

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 resolved outstanding questions dating back to 2013 and 2014. Specifically, the settlement addressed issues related to customer switch-holds, and rules surrounding calculations of 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. The commissioner order approved the settlement's aggregate penalty to the Just Energy companies of \$700,000, with \$225,000 of this aggregate amount to be directed to bill payment assistance agencies and customers needing help paying electric bills. Just Energy admitted no wrongdoing as a part of the settlement.

2. Investigation No 2018110002

In July 2019 PUCT O&E 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 provided O&E staff a report, by customer, of the amount of refunds by customer, and the method used to calculate the amounts provided. This investigation has concluded.

3. Investigation Nos. 2018030005, 2018030007, 2018030009

In September 2018 PUCT O&E 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 PUCT O&E.

4. Investigation No. 2020040005

In July 2020 PUCT O&E staff notified Just Energy it was conducting an investigation into compliance with PUCT rules related to door-to-door sales enrollments in November and December of 2019, requests for disconnections of service from December 2019 through March 2020, terms of service language related to arbitration, and call center hold times. In September 2020 the investigation was placed on hold and resumed in 2021. The company continues to work with PUCT staff as the investigation is still ongoing.

5. Investigation No. 2020030049

In March 2020 PUCT O&E staff notified Hudson Energy, Just Energy, Amigo Energy and Tara Energy it was conducting an investigation into compliance with PUCT rules related to disconnection request orders during a weather moratorium in 2018 and 2019. The companies reviewed all reported instances and found that in no case was a customer's electric service disconnected during the moratorium periods. This investigation was resolved and there was no financial penalty issued.

6. Investigation No. 2019020003

In November 2019, PUCT O&E staff sent a warning letter to Just Energy related to concerns with contract expirations and complaint handling. No penalties were proposed at this point. Processes were reviewed and to ensure full compliance going forward.

7. Investigation No. 2020040006

In April 2020 PUCT O&E staff notified Just Energy of an investigation of Just Energy's compliance with requirements in the Electricity Relief Program, Docket No. 50664. The program was established to help customers impacted by COVID-19 through unemployment or low income. The company responded to all questions received and is not aware of any PUCT concerns.

8. Investigation No. 2021080001

In August 2021, PUCT Department of Investigation and Enforcement (DICE) staff notified Just Energy of an investigation regarding enrollments and use of third parties. The company is currently preparing responses to the initial questions and will work with staff as the investigation continues.

## **Pennsylvania**

### Administrative Reporting Issues

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

In 2020, a Tentative Order from the Pennsylvania Public Utility Commission to cancel the gas license of Hudson Energy Services, LLC due to a missed report that were caused by an administrative oversight. Hudson Energy reported that they serve no gas customers in the market, submitted a report to that effect to the PaPUC and the license was considered in good standing via Commission order on June 17, 2021.

## **California**

### Resource Adequacy Capacity Issue

The California capacity wholesale market is restricted due to market scarcity issues and as a result there isn't enough of Resource Adequacy (aka – capacity or RA) available to purchase in the marketplace. As a result, Just Energy Solutions Inc. incurred penalties for shortages in 2018, 2019 and 2020. Just Energy seeks waivers for fines, where applicable and possible. From a reliability standpoint, no shortage was ever experienced, as there is a CAISO backstop capacity mechanism in place to cover shortages

### CPUC Cease and Desist Notice

On February 12, 2019, Just Energy Solutions Inc. (Just Energy) received a 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. Just Energy submitted a written response to the CPUC on 4/29/2019 communicating improved processes and controls to avoid future similar issues. No fault or penalty was assessed against Just Energy in this process.



# **Competitive Retail Electric Service Affidavit**

**County of Harris  
State of Texas**

Scott Fordham, 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, and that it will amend its application while it is pending if any substantial changes occur regarding the information provided.
2. The applicant will timely file an annual report of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Sections 4905.10(A), 4911.18(A), and 4928.06(F), Ohio Revised Code.
3. The applicant will timely pay any assessment made pursuant to Sections 4905.10, 4911.18, and 4928.06(F), Ohio Revised Code.
4. The 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. The applicant 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 will fully comply with Section 4928.09, Ohio Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.
7. The applicant will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.
8. The applicant 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 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, 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.
11. The Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the 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 consumer complaints.

12. The facts set forth above are true and accurate 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.

13. Affiant further sayeth naught.

Scott Fordham Chief Operating Officer  
Signature of Affiant & Title



Sworn and subscribed before me this 9<sup>th</sup> day of September 2021  
Month/Year

Livia Scarassati-Demoraes  
Signature of official administering oath

Scott Fordham, Chief Operating Officer  
Print Name and Title



My commission expires on 07/07/2023

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/20/2021 11:34:14 AM**

**in**

**Case No(s). 17-1991-EL-AGG**

Summary: In the Matter of the Application of Interactive Energy Group LLC