

# Buchanan Ingersoll & Rooney PC

**John F. Povilaitis**  
717 237 4825  
john.povilaitis@bipc.com

409 North Second Street  
Suite 500  
Harrisburg, PA 17101-1357  
T 717 237 4800  
F 717 233 0852

September 6, 2019

## VIA E-FILING

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

RECEIVED  
2019 SEP -6 PM 3:30  
PA PUC  
SECRETARY'S BUREAU  
FRONT DESK

Re: Just Energy Solutions, Inc. d/b/a Just Energy, Docket No. A-110117  
Utility Code: 110117

Dear Secretary Chiavetta:

Enclosed is the Compliance Filing of Just Energy Solutions, Inc. d/b/a Just Energy ("Just Energy"), a licensed energy generation supplier ("EGS"), to obtain renewal of its reduced 5% security requirement. This is a renewal of Just Energy's previously granted security reduction; therefore no filing fee is enclosed.

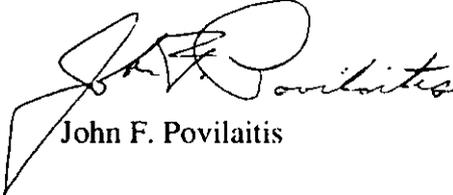
The Compliance Filing includes commercially valuable and sensitive information for which Just Energy requests confidential treatment. Accordingly, enclosed is a version of the Compliance Filing marked "Public Version" for inclusion in the public record, and a version of the Compliance Filing marked "Confidential Version." **Just Energy respectfully requests that the Confidential Version of its Compliance Filing be maintained by the Pennsylvania Public Utility Commission under seal.**

Copies of the Public Version of Just Energy's Compliance Filing have been served on each of the statutory parties, the Commission's Bureau of Technical Utility Services, the Commonwealth of Pennsylvania's Department of Revenue, the Office of Attorney General's Bureau of Consumer Protection and all affected Pennsylvania electric distribution companies, as indicated in the attached Certificate of Service.

September 6, 2019  
Page - 2 -

Please contact the undersigned if you have any questions regarding this filing. Thank you for your attention to this matter.

Very truly yours,



John F. Povilaitis

Enclosures  
cc: Certificate of Service

RECEIVED  
SEP - 6 2019  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**COMPLIANCE FILING TO MAINTAIN  
PaPUC 5% SECURITY REQUIREMENT**

**Just Energy Solutions, Inc. d/b/a Just Energy**

**Bonding/Security Requirement Filing for Continuation of Reduced Security**

1. Just Energy Solutions, Inc. d/b/a Just Energy (“Just Energy” or “Company”) is a licensed electric generation supplier (“EGS”) in the Commonwealth of Pennsylvania. Just Energy’s Application Docket No. is A-110117 and its Utility Code is 110117. Just Energy’s contact person is Kristina Montgomery, Manager, Regulatory Affairs & Government Relations, 5251 Westheimer Road, Suite 1000, Houston, Texas 77056, [kmontgomery@justenergy.com](mailto:kmontgomery@justenergy.com), 717-418-6508.

2. Just Energy has been a licensed EGS since September 15, 1999 and has maintained its license in good standing since that time.

3. Just Energy is compliant with its current bonding requirements. Just Energy’s most recent security reduction renewal was approved by Secretarial Letter dated October 16, 2018 at Docket No. A-110117. The Company’s security expiration anniversary date is December 9, 2019.

4. By Final Order entered July 24, 2014, the Pennsylvania Public Utility Commission (“Commission”) held that an EGS, following its first year of operations, may petition to have its bonding requirement reduced from 10% to 5% of the EGS’s last 12 months of gross receipts or \$250,000, whichever is greater. *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers: Acceptable Security Instruments*, Docket No. M-2013-2393141 (Order entered July 24, 2014). By Order of September 20, 2018, the Commission ended its requirement that EGSs petition for a reduction of its bonding requirements from 10% to 5% of gross receipts and authorized compliance filings to obtain renewals of security reductions. *Petition of the Retail Energy Supply Association to Simplify the Financial Security 5% Renewal Process*, Docket No. P-2017-2608078 (Order entered September 20, 2018).

5. The current financial security in place for Just Energy expires on December 9, 2019.

6. Just Energy’s most recent 12 months of gross receipts and the 5% calculation on this total amount are provided in Confidential Attachment A.

7. Confidential Attachment B is Just Energy’s Pennsylvania Department of Revenue Tax Status Letter of Good Standing.

8. Confidential Attachment C is Just Energy’s confirmation AEC Requirements have been met.

9. Confidential Attachment D is Just Energy’s Pennsylvania Department of Revenue REV-423 Corporation Specialty Tax Estimated Payment Form.

RECEIVED

SEP - 6 2019

10. Confidential Attachment E is a continuation certificate of the Company's current financial instrument in the amount of 5% of Just Energy's gross receipts, effective until December 9, 2020.<sup>1</sup>

---

<sup>1</sup> The financial instrument will be submitted to the Commission upon receipt.

# Confidential Attachment A

12 months of gross receipts and calculation of 5% security amount

(Redacted)

# Confidential Attachment B

Letter of Good Standing

(Redacted)

RECEIVED

SEP - 6 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# Confidential Attachment C

AEC Requirements

(Redacted)

RECEIVED

SEP - 6 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# Confidential Attachment D

REV-423 Corporation Specialty Tax Estimated Payment Form

(Redacted)

RECEIVED

SEP - 6 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

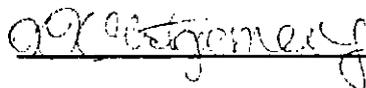
# Confidential! Attachment E

Continuation Certificate

(Redacted)

**VERIFICATION**

I, Kristina Montgomery, Manager, Regulatory Affairs, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

  
\_\_\_\_\_

Dated: September 6, 2019

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Just Energy Solutions, Inc. d/b/a Just Energy : Docket No. A-110117  
Utility Code: 110117 :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the **public version** of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

**Via First Class Mail**

Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 17101

Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
PO Box 3265  
Harrisburg, PA 17105-3265

Office of Attorney General  
Bureau of Consumer Protection  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101

Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
3rd Floor  
Harrisburg, PA 17105

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
PO Box 280947  
Harrisburg, PA 17128

Citizens' Electric Company  
Attn: EGS Coordination  
1775 Industrial Boulevard  
Lewisburg, PA 17837

Regulatory Affairs  
Duquesne Light Company  
411 Seventh Street, MD 16-4  
Pittsburgh, PA 5219

Legal Department  
First Energy  
2800 Pottsville Pike  
Reading, PA 19612

Wellsboro Electric Company  
Attn: EGS Coordination  
33 Austin Street  
P.O. Box 138  
Wellsboro, PA 16901

**PUBLIC VERSION**

Legal Department  
West Penn Power d/b/a Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Manager Energy Acquisition  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101-8699

Office of General Counsel  
Attn: Kimberly Klock  
PPL  
Two North Ninth Street  
Allentown, PA 18108-1179

Vice President – Energy Supply  
Corning Natural Gas Holding Corporation  
330 West William Street  
Corning, NY 14830

UGI Utilities, Inc.  
Attn: Rates Dept. – Choice Coordinator  
2525 N. 12<sup>th</sup> Street, Suite 360  
P.O. Box 12677  
Reading, PA 19612-2677

Dated this 6<sup>th</sup> day of September, 2019.

  
\_\_\_\_\_  
John F. Povilaitis

RECEIVED  
2019 SEP - 6 PM 3:30  
PA PUC  
SECRETARY'S BUREAU  
FRONT DESK